



European
Commission

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

Revision of European Ecolabel Criteria for Tourist Accommodation and Camp Site Services

Technical Report- Revision v2:
Draft criteria proposal for revision of ecological criteria

Candela Vidal-Abarca Garrido, Rocío Rodríguez Quintero, Oliver Wolf (JRC-IPTS)
Katherine Bojczuk, Tecla Castella, Jane Tewson (Oakdene Hollins)

April 2015



Joint
Research
Centre

European Commission
Joint Research Centre
Institute for Prospective Technological Studies. Edificio EXPO-C/ Inca Garcilaso, 3-E 41092 Seville

Author(s): Candela Vidal-Abarca Garrido, Rocío Rodríguez Quintero, Oliver Wolf (JRC-IPTS)
Katherine Bojczuk, Tecla Castella, Jane Tewson (Oakdene Hollins)

Contact information

Dr. Candela Vidal-Abarca Garrido

Address: Joint Research Centre, Edificio EXPO, Calle Inca Garcilaso 3, E-41092 Sevilla, Spain

E-mail: Candela.VIDAL-ABARCA-GARRIDO@ec.europa.eu

Tel.: +34 954 488 483

<http://susproc.jrc.ec.europa.eu>

<http://www.jrc.ec.europa.eu/>

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Table of Contents

EXECUTIVE SUMMARY	3
1 INTRODUCTION	4
1.1 Aim of this report.....	4
1.2 Summary of preliminary review for tourist accommodation.....	5
2 EXAMINATION OF SPECIFIC CRITERIA.....	32
2.1 Changes to existing criteria.....	32
2.2 Impact of changes to criteria after AHWG1.....	197
REFERENCES	200
ACRONYMS	202
ANNEX I BEMP COMPARISON WITH EU ECOLABEL CRITERIA.....	204
ANNEX II POINTS ALLOCATION FOR CURRENT AND UPDATED CRITERIA.....	212
ANNEX III STAKEHOLDER COMMENTS DURING AND AFTER FIRST AD HOC WORKING GROUP.....	215

Lists of tables

Table 1: Mapping criteria for Tourist Accommodation and Camp Site Services	5
Table 2: Types of tourist accommodation.....	7
Table 3: Modelled specific water consumption per guest-night in a 120 bed hotel implementing average and good management across water using processes	12
Table 4: Link between the hotspots identified (BEMP and LCA) and the revised EU Ecolabel criteria.....	17
Table 5: UK domestic electricity suppliers.....	36
Table 6: Spanish domestic electricity suppliers and their renewable energy supply capacity.....	36
Table 7: RES-E ecolabels in Europe.....	39
Table 8: Benchmarks for water heating energy efficiency of water heaters	45
Table 9: Water heating energy efficiency classes of water heaters, categorised by declared load profiles, n wh in %	45
Table 10: Proposed n _s thresholds and equivalent TEWI values.....	46
Table 11: Energy efficiency class for air conditioners.....	49
Table 12: Comparison of NO _x emission limits in different product policy schemes.....	109
Table 13: Water consumption of best available technology on the market for household dishwashers at the time of entry into force of COMMISSION REGULATION (EU) No 1016/2010	144
Table 14: Water consumption of best available technology on the market for household washing machines at the time of entry into force of COMMISSION REGULATION (EU) No 1015/2010	147
Table 15: Maximum number of points achievable for current and updated optional criteria	197

Lists of figures

Figure 1: Energy consumption by end-use in hotels.....	11
Figure 2: Modelled average and achievable best practice energy consumption for a 100-room 5,300m ² hotel.....	11
Figure 3: Waste hierarchy	13
Figure 4: Proportion of electricity generated from renewable sources, 2012. (% of gross electricity consumption).....	35
Figure 5: Electricity suppliers in Ireland (2012).....	37
Figure 6: Energy efficiency classes for lamps and LED modules.....	59
Figure 7: Recommended design values of the indoor temperature for design of buildings	117
Figure 8: Sales unit share by energy efficiency class, by country, January to February 2014	126
Figure 9: Sales of appliances in 23 European countries	126
Figure 10: Market share of label A to A+++ for refrigerators (EU-15).....	127
Figure 11: Market share of electric ovens and cookers in 8 European countries.....	128

Executive summary

The objective of this project is to revise the two existing EU Ecolabel criteria (2009/578/EC & 2009/564/EC: Commission Decisions of 9 July 2009 respectively) relating to tourism services: tourist accommodation services (TAS) and camp site services (CSS). This report outlines each criterion and provides the rationale for any changes/updates together with an analysis of the expected impact of these changes.

The report consists of the following sections:

1. *Introduction* – outlining the purpose of this report and providing a brief summary of the Preliminary Report which provides background to this document.
2. *Examination of specific criteria* – a proposal is made for the updating/revision of each of the criterion for tourist accommodation. After each set of criterion, stakeholder questions are outlined. The section finishes with an analysis of the impact of the proposed changes to the criteria.

DRAFT

1 Introduction

This document is intended to provide the background information for the revision of the EU Ecolabel criteria for tourist accommodation. The study has been carried out by the Joint Research Centre's Institute for Prospective Technological Studies (JRC-IPTS) with technical support from Oakdene Hollins. The work is being developed for the European Commission's Directorate General for the Environment.

1.1 Aim of this report

The main purpose of this document is to evaluate the current criteria for tourist accommodation (TAS) and camp site services (CSS). Each criterion will be discussed to determine its relevance and to propose any necessary revisions, restructuring or removal of the criterion. This document is complemented by the Preliminary Report, which summarizes the single task reports on scope and legislative analysis (Task 1), market analysis (Task 2), technical analysis (Task 3) as well as the improvement potential (Task 4) to support the criteria proposals.

For each criterion (outlined in Section 2.1), the current text is provided, including assessment and verification requirements. A discussion including rationale for changes or maintaining the criterion is then outlined: this incorporates information collected in the initial phases of this project, presented in the Preliminary Report. Any 'feedback' discussed at this stage of the report refers to feedback from the stakeholder questionnaire, which was sent to a wide variety of organisations and government bodies engaged in the tourist accommodation industry. Where changes or updates are suggested the revision to the EU Ecolabel criterion is proposed, with changes underlined for comparison.

After each set of criteria (e.g. for mandatory energy criteria), a number of questions are outlined. These have been developed using feedback from Competent Bodies, relating to the proposals for updated criteria. The intention is that this Technical Report will be updated during the criteria development process, based on further research, stakeholder inputs or input from the working group meetings. The final Technical Report will bring together all the arguments for the proposed new criteria document.

Modifications in the report after AHWG1

- A new section under each criterion (outlined in Section 2.1) has been introduced. It consists of:
 - [Relevant feedback during and after AHWG 1](#)
 - [Proposed update](#): A brief justification of the revised proposal and a text box with updated numeration and the revised proposal, with [changes underlined](#) to allow these changes to be compared to first proposal.
- With regards to the technical analysis a summary section 1.2.2 *Key environmental aspects and relation with the criteria proposal* has been introduced to show the link between the identified hotspots (BEMP and LCA) and the revised second proposal EU Ecolabel criteria.
- The section 2.2 *Impact of changes to criteria* has been replaced by *impact of changes to criteria after the AHWG1* to reflect the latest modifications and the impact of the reallocation of points.
- Annexes have been updated to reflect the latest proposed changes.
- Consultation comments from the previous round of consultations have been deleted to simplify the document and new consultation comments have been introduced where considered necessary.

- Annex III with stakeholder comments and responses during and after the AHWG1 has been included at the end of the document.

[All new text that has been added to this document is written in blue.](#)

1.2 Summary of preliminary review for tourist accommodation

The Preliminary Report forms the initial stage of revising the criteria for the product groups TAS and CSS. This includes the updating and revision of the scope and definitions of the current criteria, an analysis of the tourist accommodation market and the implications for the EU Ecolabel, and a review of the scientific evidence to identify the main environmental impacts of TAS and CSS. The sections below provide a summary of the findings from the Preliminary Report. Further details can be found at *Revision of European Ecolabel Criteria for Tourist Accommodation and Campsite Services - Preliminary Report* (July 2014).

1.2.1 Scope and definition

Included within a review of the scope and definition of TAS and CSS are a number of proposed changes, including a proposal to merge the criteria for these two product groups (titled “tourist accommodation”) and a proposal to re-define the scope to include conference facilities. The rationale for these changes (and any proposed text to be included in the EU Ecolabel) is outlined in the sections below.

1.2.1.1 Merging TAS and CSS criteria

Table 1 below shows that there are clear synergies between the current sets of EU Ecolabel criteria for TAS and CSS, and so it is feasible to develop the product group “tourist accommodation” to cover both accommodation types. Where there are differences, these are primarily because of the difference in services provided (e.g. chemical toilet disposal). These differences will need to be considered in the process of revising the criteria, but do not prevent the two criteria sets from being merged. Instead, separate criteria can be developed to reflect these technical differences. However, this will require separate definitions to be developed for TAS and CSS.

Table 1: Mapping criteria for Tourist Accommodation and Camp Site Services

EU Ecolabel Criteria for TAS and CSS		Common criteria	Additional criteria
Mandatory criteria	Energy	✓	-
	Water	✓	-
	Detergents and Disinfectants	✓	-
	Waste		CSS includes additional criterion for: 16. Chemical toilet disposal points
	Other Services	✓	-
	General Management	✓	-
Optional criteria	Energy	✓	-
	Water	✓	-
	Detergents and Disinfectants		CSS includes additional criterion for: 66. Car washing in specially outfitted areas
	Waste		CSS includes additional criteria for: 75. Run-off from car parks 77. Regulation of Camp Site traffic

EU Ecolabel Criteria for TAS and CSS		Common criteria	Additional criteria
	Other Services		CSS includes additional criteria for: 78. Camp Site generated traffic 79. Trolleys for guests on the Camp Site 80. Unsealed surfaces
	General Management	✓	-

In order to obtain feedback on the current EU Ecolabel criteria for TAS and CSS, a questionnaire was sent to stakeholders including tourist accommodation and camp site service providers, tour operators and agents, Competent Bodies, tourism or travel/trade associations and government bodies. Overall, there was support for merging TAS and CSS into a common set of criteria, titled “tourist accommodation services”. However, separate definitions for tourist accommodation and campsites should be maintained to account for any technical differences between the two which would result in dissimilar criteria. The definition of the product group “tourist accommodation”, and its components, is further defined in the next section.

1.2.1.2 Defining the product group

Current scope and definition:

TAS:

The product group ‘tourist accommodation service’ shall comprise the provision, for a fee, of sheltered overnight accommodation in appropriately equipped rooms, including at least a bed, offered as a main service to tourists, travellers and lodgers.

The provision of overnight sheltered accommodation may include the provision of food services, fitness and leisure activities and/or green areas.

For the purposes of this Decision, food services shall include breakfast; fitness and leisure activities/facilities shall include saunas, swimming pools and all other such facilities, which are within the accommodation grounds and green areas shall include parks and gardens, which are open to guests.

CSS:

The product group ‘camp site service’ shall comprise, as a main service provided for a fee, the provision of pitches equipped for mobile lodging structures within a defined area.

It shall also comprise other accommodation facilities suitable for the provision of shelter to lodgers and collective areas for communal service if they are provided within the defined area.

The ‘camp site service’ provided within the defined area may also include the provision, under the management or ownership of the campsite, of food services and leisure activities.

For the purposes of this Decision, food services shall include breakfast; fitness and leisure activities/facilities shall include saunas, swimming pools and all other such facilities, which are within the accommodation grounds and green areas such as parks and gardens, which are open to guests, and which are not part of the campsite structure.

The current EU Ecolabel definition of TAS and CSS was assessed against a number of sources to determine its suitability. This included an analysis of alternative eco-labels for tourist accommodation and other definitions from sources such as EU datasets. The following conclusions were drawn:

- Although there are a number of alternative labels for tourist accommodation, few of them provide a definition or scope outline of the type of organisation or service they are referring to. Where distinctions are made between types of tourist accommodation, and different criteria are developed, these focus on either the size of the hotel (Green Key provides separate criteria for small accommodation), or the services offered (Nordic Swan distinguished hotels from youth hostels as these offer different service levels). The distinction between campsite and hotel is also made by Green Key criteria. Generally, definitions provided are broad.
- Very few formal definitions or scope documents for tourist accommodation or related accommodation provision have been developed. The types of accommodation (e.g. hotel, bed and breakfast or hostel) are often separately defined, however. To maintain consistency with other definitions and categorisations of tourist accommodation, the EU Ecolabel should include these varying types of accommodation in scope.
- Where more detailed definitions (such as NACE codes) have been developed, these define tourist accommodation in a similar way to the current EU Ecolabel criteria – definitions relate to specific characteristics such as to the provision of sheltered accommodation (or pitches for camp sites) or the types of services that are offered (such as the provision of food services). The current scope and structure of the TAS and CSS definitions should therefore be maintained for the merged product group, tourist accommodation.

Table 2 below summarises some of the specific types of accommodation which have been outlined in various definitions of tourist accommodation. Next to each is an indication of whether these are included under definitions for TAS and CSS. Overall, the current EU Ecolabel definitions for TAS and CSS encompass all relevant accommodation types.

Table 2: Types of tourist accommodation

Type of accommodation	Covered in the EU Ecolabel definitions?
Hotel (Large, medium or small)	✓ included in TAS definition
Motel	✓ included in TAS definition
Group accommodation and holiday homes	✓ included in TAS definition
Hostel	✓ included in TAS definition
Bed & breakfast	✓ included in TAS definition
Guest houses or rental apartments	✓ included in TAS definition
Lodges	✓ included in TAS definition
Visitor flats or bungalows	✓ included in TAS definition
Chalets or cabins	✓ included in TAS definition
Camp sites (provision of pitches for tents or other mobile structures such as motor homes)	✓ included in CSS definition
Bungalows, rental mobile lodging and apartments	✓ included in CSS definition

In defining the scope and definition of a revised EU Ecolabel for tourist accommodation, it is also necessary to consider whether all services are currently covered under this definition – for example, food service or access to leisure facilities.

The stakeholder questionnaire asked for feedback on the current EU Ecolabel definition. Several respondents noted that conference rooms/training rooms (i.e. the provision of a room for an event such as a meeting or conference) should be included in this list, where this service is incidental to the provision of accommodation. It should also be noted that several alternative eco-labels for tourism include a criterion which relates specifically to conference facilities (e.g. offering of 'green event packages' and a criterion for 'green conference paper etc.')

It is suggested that the current scope of the criteria be extended to consider:

1. merging TAS and CSS (although separate definitions should still be maintained for each)
2. adding 'conference facilities' to the list of services provided.

The merged product group 'tourist accommodation' will be defined as:

Revised scope and definition:

The product group "tourist accommodation" comprises:

The provision of tourist accommodation services and/or campsite services

Tourist accommodation services:

'Tourist accommodation service' shall comprise the provision, for a fee, of sheltered overnight accommodation in appropriately equipped rooms, including at least a bed, offered as a main service to tourists, travellers and lodgers.

Campsite services:

'Campsite service' shall comprise, as a main service provided for a fee, the provision of pitches equipped for mobile lodging structures within a defined area. Mobile lodging structures as referred are those such as tents, caravans, mobile homes and camper vans. Accommodation facilities suitable for the provision of shelter to lodgers are facilities such as bungalows, rental mobile lodging and apartments.

It shall also comprise other accommodation facilities suitable for the provision of shelter to lodgers and collective areas for communal service if they are provided within the defined area. Collective areas for communal services are such as washing and cooking facilities, supermarkets and information facilities.

The provision of tourist accommodation services and/or campsite services may include the provision of food services, fitness and leisure activities, green areas and/or conference facilities.

In the framework of this Decision, food services include breakfast; fitness and leisure activities/facilities include saunas, swimming pools and all other such facilities, which are within the accommodation grounds, green areas include parks and gardens, which are open to guests and conference facilities includes the provision of a room for singular events such as business conferences, meetings or training events.

1.2.2 Key environmental aspects and relation with the criteria proposal

The EU Ecolabel criteria should be based on scientific evidence and should focus on the most significant environmental impacts during the whole life cycle of products. The aims of the EU Ecolabel should align with these impacts. To determine whether the EU Ecolabel covers the most significant impacts for tourist accommodation, a number of sources were considered including: a number of relevant LCAs, a recent report by the IPTS on best environmental management practice (BEMP) in the tourism sector [JRC IPTS (2013)]; and several alternative eco-labels (e.g. The Nordic Swan, The Austrian Ecolabel (Das Österreichische Umweltzeichen), Green Key...).

The complete technical analysis can be found in the Preliminary Report produced in July 2014, however the main environmental aspects revealed by LCA and BEMP and relation with the proposed criteria are outlined under this section.

Life Cycle Assessment literature review

A review of available Life Cycle Assessment (LCA) studies for tourism services has been undertaken, to support the current revision of the EU Ecolabel criteria for Tourist accommodation and Campsite services. This analysis aims to identify the main environmental areas of concern and life cycle hot-spots for tourist accommodation.

In order to establish a basis for the criteria revision process, a number of existing LCA studies have been screened; applying common criteria on quality and relevance. The main results have been analysed, and summary of key environmental issues drawn for this study are the following:

Camillo De C. et al (2010a):

- The author distinguishes two main subsystems: Passenger transportation and Accommodation Services. LCA implementation has mainly identified the following processes as crucial points of the system: energy production (power and thermal energy) for hotel and related services, petrol and diesel car transport, air transport, and some disposal processes in landfill.
- The transport system has a higher impact than accommodation services in the acidification (AP) and abiotic depletion (ADP) categories. Accommodation services have a greater effect on ecotoxicity, including human toxicity (HTP) and radioactivity (RAD).
- Focusing on the transport modes used by domestic guests, it emerges that passenger transportations by petrol- and diesel-fuelled cars and air transport are the most burdening processes.
- Concerning accommodation, the 'lodging' system is potentially more responsible than 'reception and administration' across all impact categories. Results have shown that energy production (power and thermal energy) and some disposal processes in landfill are the main burdening processes.
- In order to substantially improve the environmental performance of the system analysed, the authors identify some preliminary actions: switching to a supply of energy from renewable sources, implementing energy saving policies, promotion of more environmentally-friendly transport solutions, separate collection of waste (not only in the hall, but also in the hotel rooms), selection of suppliers with a better environmental performance and provision of more environmentally-sound food for breakfast.

Beatriz Roselló-Batle et al. (2009):

- This study considered three to four phases of tourist accommodation, and revealed that the operating phase is responsible for the greatest environmental impacts of the whole building.

- Concerning energy use, near to 78% of the total energy use during an assumed lifetime of 50 years, comes from the operation phase. It is during this phase where it is possible to achieve the biggest reductions in energy use.
- A 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.
- Finally, concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total. The introduction of domestic solid waste composting would contribute to a reduction in quantity of waste produced in this hotel. It is a simple activity and the necessary investment is low.

Castellani V. and Sala S. (2012):

- The results of this study suggest that a positive impact might be accomplished by the contribution of separate waste collection and the use of thermal water.
- It is also relevant that in two case studies, the electricity consumption is the main environmental impact. Gas consumption in the restaurant and the transportation of food from the retailer to the hotel are also identified as hotspots related to food preparation.
- The construction of the hotel results in an important impact, due to the transportation of construction materials.
- The impact on respiratory inorganics is 68.5% due to electricity consumption, and 22.4% to the hotel assembly. In addition, the contribution to climate change comes mainly from electricity consumption (69.4%), hotel assembly (16.9%) and from the transportation of food from the retailer to the hotel that offer food services (10.8%).
- Fossil fuel impact is due to electricity consumption (59.8%), gas consumption related to the restaurant (19.6%) and to the assembly of the hotel (19.6%); mainly for the transportation of construction materials.

Filimonau V. et al. (2011):

- The results of this study show that electricity consumption represents the largest energy demand and source of GHG emissions in both of the hotels analysed.
- The study also suggests that catering and laundry services might become a significant contribution to the overall energy consumption and consequent GHG emissions of hotels (up to 30-40%).
- The authors advise the installation of energy meters in hotels and continuous monitoring, as a tool to better identify previously hidden energy consumption sources.

Best environmental management practice (BEMP) in the tourism sector [JRC IPTS (2013)]

To cover a larger range of the environmental aspects related to the Tourist Accommodation services it was considered relevant to use, besides LCA methodologies, other sources as the Best Environmental Management Practices report. In particular, the mentioned report identifies the potential savings on water consumption related to the accommodation sector. This allows covering water consumption aspects that are not specifically tackled by the LCA methodology and thus not considered in the LCA review made. This is because the LCA method lacks still to robustly address the impacts associated with the effects of water consumption by products/services.

The BEMP report identified the most important environmental aspects for tourist accommodation as:

1. Accommodation: Energy consumption.
2. Accommodation: Water consumption.
3. Accommodation: Waste generation and wastewater management.

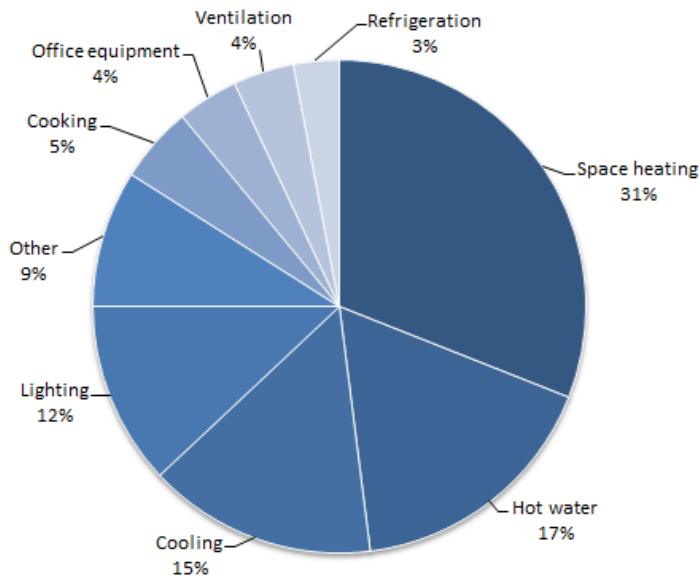
4. Other areas. restaurant and hotel kitchens and campsites

Each of these aspects is outlined in further detail below.

Accommodation energy consumption

Energy consumption in tourist accommodation sites can be significant. Figure 1 identifies the key areas on energy use in hotels. The most significant portion of this, 46%, relates to heating and cooling of the site (space heating 31%, cooling 15%) with water heating (17%) and lighting (12%) also showing significant energy consumption.

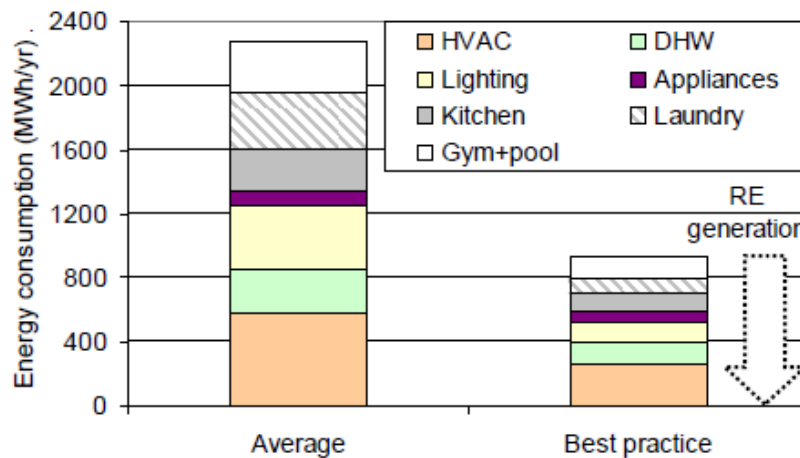
Figure 1: Energy consumption by end-use in hotels



Source: Data from HES (2011), cited in JRC IPTS (2013), Reference Document on Best Environmental Management Practice in the Tourism Sector

Figure 2 provides a modelled example of how good management can reduce energy use in a hotel by over 50%. Key areas where energy use can be significantly reduced include: heating, ventilation and air conditioning (HVAC); lighting; and laundry.

Figure 2: Modelled average and achievable best practice energy consumption for a 100-room 5,300m² hotel



NB: assumes average occupancy rate of 80% of rooms (of which 25% double occupancy). Source: JRC IPTS (2013) Reference Document on Best Environmental Management Practice in the Tourism Sector

To achieve these energy reductions, a number of BEMP activities can be undertaken:

- Monitoring and measurement of energy use (including sub-metering, inspection and maintenance, staff and guest training, adequate insulation, automated control, energy management plans) can be effective in understanding where energy use can be minimised.
- Buildings should either be built, or retrofitted, to minimise heating and cooling energy requirements.
- HVAC energy consumption can be minimised by installing zoned temperature controls and by ensuring all equipment meets energy efficiency requirements.
- Efficient applications of heat pumps and geothermal heating/cooling. BEMP is to install efficient (e.g. ecolabelled) heat pumps for heating and cooling, or, where possible, groundwater cooling.
- Energy efficient lighting (including a control system for this) should be installed.
- Renewable energy sources. BEMP is to install on-site geothermal, solar or wind energy generation equipment where appropriate, and to procure electricity from a genuine (i.e. verifiably additional) renewable electricity supplier.

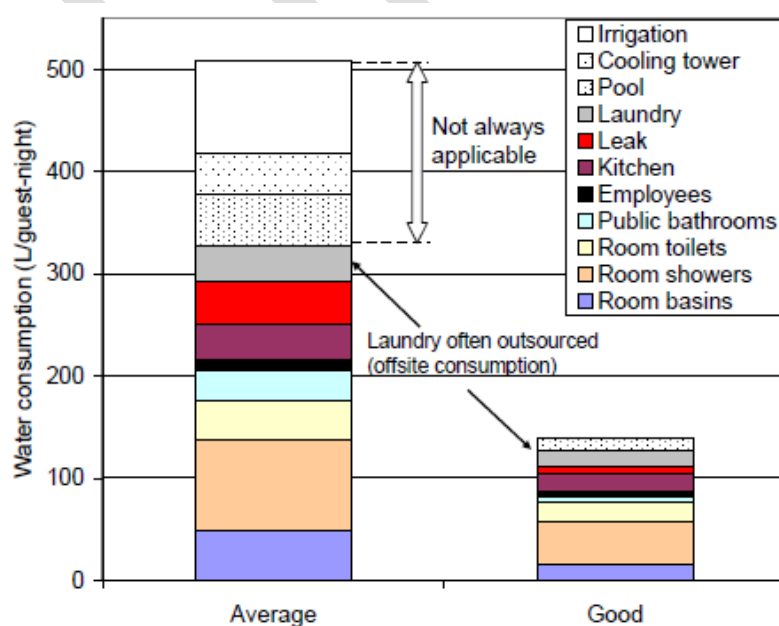
Once these measures to reduce energy demand have been implemented, further reductions in the use of primary energy can be made by increasing the supply of renewable energy; in particular, installing onsite systems such as geothermal, solar or wind.

Accommodation: Water consumption

Water use in tourist accommodation has been identified as a significant environmental aspect. It is estimated that water can account for approximately 10% of utility bills in hotels, but this can vary considerably across different types of accommodation and is dependent on the facilities offered (for example a swimming pool or laundry facilities).

There is a real opportunity for tourist accommodations to better manage water consumption, reducing their environmental burden and potential high cost of water use. [JRC IPTS (2013), p.207].

Table 3: Modelled specific water consumption per guest-night in a 120 bed hotel implementing average and good management across water using processes



NB: This figure assumes 80% room occupancy (20% double occupancy). Based on average and good performance data presented in JRC IPTS (2013), BEMP
 Source: JRC IPTS (2013), Reference Document on Best Environmental Management Practice in the Tourism Sector

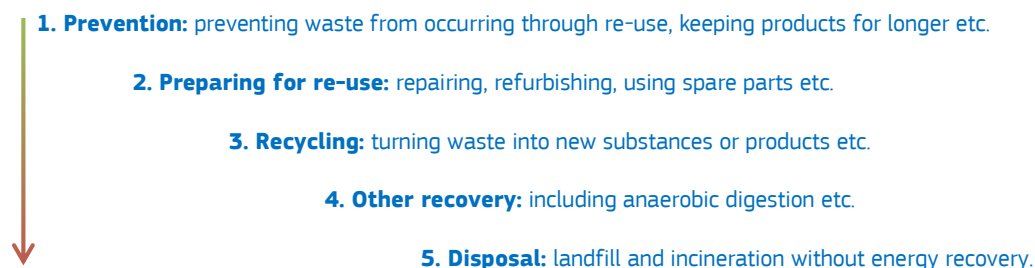
To achieve these water efficiency savings, a number of best environmental management practices are suggested. These can be summarised as [JRC IPTS (2013), p.208-209]:

- Water system monitoring, maintenance and optimisation. Maintenance of water-using devices is important – this can prevent or detect any leaks. Monitoring water use through meters (and, where possible, sub-meters) can help tourist accommodation sites better manage and find areas to reduce water use.
- Installation of efficient water fittings (for example those which have been EU Ecolabelled or awarded other Type-I environment labels) is beneficial. This may include, for example, low flow toilets, sensors to regulate the use of water, or timers to restrict unnecessary water use.
- Efficient housekeeping operations, such as implementation of a bedclothes and towel re-use scheme or employing water saving cleaning methods (such as turning off taps when cleaning or only flushing toilets as required) can reduce water usage. Best practice is also to train staff on the implementation of water- and chemical-efficient cleaning methods, and to procure environmentally certified consumables for bedrooms and bathrooms.
- Optimised large-scale or outsourced laundry operations. BEMP is to select an efficient laundry service provider that is certified by an ISO Type I ecolabel or that complies with criteria in such labels, or to ensure that on-site large-scale laundry operations comply with such criteria.
- Optimised pool management. BEMP is to optimise the frequency and timing of backwashing based on the pressure drop rather than fixed schedules, to use ozonation or UV treatment and careful dosing control to minimise chlorination, and to recover heat from exhaust ventilation air.
- The laundry process should be optimised to minimise the number of washes - green procurement of efficient washing machines can help to reduce both water and energy use.
- Rainwater and grey water recycling. The use of grey water or recycled water should be encouraged
- Irrigation should be optimised. This may include planting only indigenous species, or watering plants at the best time of day to minimise evaporation losses.

Accommodation waste generation and wastewater management

Waste generation is another significant aspects of tourist accommodation. Article 4 of the revised EU Waste Framework Directive, identifies the waste hierarchy (Figure 3) which sets out steps for dealing with waste in order of environmental preference. Waste prevention is the most preferred, with disposal, at the bottom of the hierarchy, least preferred.

Figure 3: Waste hierarchy



Source: gov.uk. (Available at: <https://www.gov.uk/waste-legislation-and-regulations>)

Additionally, BEMP suggested that wastewater management is a relevant environmental aspect related to the accommodation and best practices are also provided to better manage this.

The BEMP actions can help to achieve this:

- Waste sorting and sending for recycling. BEMP is to provide separated waste collection facilities throughout the establishment, to ensure that there is a clear procedure for waste separation, and to contract relevant recycling services at least for glass, paper and cardboard, plastics, metals and organic waste.
- Waste water treatment where there is not access to centralized waste water treatment. BEMP is to install an on-site waste water treatment system that treats waste water at least to secondary, and preferably to tertiary, level, and includes at least pretreatment to screen solids and settle particulate matter followed by efficient biological treatment (e.g. in a sequencing batch reactor) to remove a high proportion of COD, BOD, nitrogen and phosphorus from the final effluent. Sludge is treated and disposed of in an environmentally acceptable manner.
- A waste survey or inventory could be developed to help understand where waste is produced, and how it can be reduced.
- Procurers can reduce waste in a number of ways: efficient ordering and storage can reduce the need to throw away unused or spoiled products; where possible, packaging to be returned for re-use; and products with less packaging can be selected.
- The housekeeping function can help to reduce waste by replacing individually wrapped soaps and shampoos with bulk items, or dispensers. The use of liners in bins should also be avoided, or these should be re-used.
- Any caterers on site should only use re-usable glasses, plates and cutlery. Single-use products should also be avoided and food cooked to order where possible.
- At the reception, documents should only be printed when necessary.

Even where the actions above are taken, waste will not be eliminated. Emphasis should therefore be placed on recycling of waste.

Best practice measures for separating and recycling waste include:

- Monitoring and reporting of waste generation, by type of material
- Procurement of products with packaging made from recyclable materials
- Installation of separate waste collection bins in guest and staff areas – staff should be trained to ensure waste separation is carried out.

Other areas

In addition to reducing energy, water and waste across tourist accommodation sites, BEMP has also been developed for other specific impact areas including:

Restaurants and hotel kitchens

Larger hotels, and a number of smaller tourist accommodation sites, offer some food service to guests. Kitchens can use large amounts of energy and water, and often generate large quantities of organic waste in particular. BEMP to reduce the impacts of these include:

- Green sourcing of food and drink products. BEMP is to assess food and drink supply chains to identify environmental hotspots and key control points, including editing of menus to avoid particularly damaging ingredients (e.g. endangered fish species and some out-of-season fruit), and selection of environmentally certified products.
- Organic waste management. BEMP is to minimise avoidable food waste by careful menu development and portion sizing, and to ensure that all organic waste is

separated and sent for anaerobic digestion where available, or alternatively incineration with energy recovery or local/on-site composting.

- Optimised dishwashing, cleaning and food preparation. BEMP is to select efficient washing equipment, including trigger-operated low-flow pre-rinse spray valves, efficient dishwashers and connectionless steamers, and to monitor and benchmark water consumption in kitchen/restaurant areas.
- Optimised cooking, ventilation and refrigeration. BEMP is to select efficient cooking equipment, including induction-hob or pot-sensor-controlled gas ovens, efficient refrigeration equipment that uses natural refrigerants such as ammonia or carbon dioxide, and to control ventilation according to demand.

Campsites

Campsites are typically assumed to have a lower environmental impact per guest-night than hotels or other tourist accommodation. This is primarily because facilities such as catering, laundry services and swimming pools are not as widely available. Campsites are most often located in rural areas, and their main environmental impacts arise from transport to and from the site and from visitor impacts on local biodiversity [JRC IPTS (2013)]. Campsites can nevertheless put practices in place to reduce energy and water use and waste generation.

BEMP for campsites includes:

- Environmental education of guests. BEMP is to provide guests with interactive on-site education on environmental issues, including courses, nature trails, or equipment such as low-carbon transport (bicycles, electric bicycles).
- Environmental management of outdoor areas. BEMP is to maximise on-site biodiversity through planting of native species and installation of green or brown roofs and walls. BEMP is to minimise water consumption for irrigation and use grey water or rainwater. BEMP is to minimise light pollution arising from outdoor lighting (e.g. through use of correctly angled low-pressure sodium lamps) and reducing noise pollution from outdoor events by installing sound barriers and enforcing strict curfew rules for such events.
- Campsites energy efficiency and renewable energy installation. BEMP is to minimise energy consumption for water-heating, HVAC and lighting by installing low-flow fittings, good building insulation, and fluorescent or LED lighting, and also to install on-site renewable energy generating capacity (e.g. solar water-heating). Additionally, heat may be recovered from washroom grey water using a heat pump.
- Campsite water efficiency. BEMP is to minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs and waterless urinals.
- Campsite waste minimisation. BEMP is to minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting waste recycling services.
- Natural pools. BEMP is to install a natural pool or convert an existing pool to a natural pool.

BEMP differentiates campsite services of other accommodation services assuming that catering, laundry services and swimming pools are not as widely available in campsite. However fundamental criteria related to energy water and waste are also relevant to campsite services. Additionally, campsites range from basic camping grounds comprising simply of pitches where guests can pitch their tents, to large campsites offering a wide range of amenities and services including restaurants and swimming pools. Therefore, it is proposed to keep the current structure of criteria horizontal for both services. This configuration

(mandatory-optional criteria) is flexible to allow campsites presenting food services or hotels with green areas management to comply with relevant criteria.

It is important to highlight that although there is no a specific section for chemical use in BEMP document, the report suggests that the quantity and type of chemicals used for housekeeping operations have been considered to be an important environmental aspect at the tourist accommodation and following best practices are identified by BEMP:

- Minimising the use of chemicals (e.g. laundry, dishwashers, de-icing, disinfectants, pools...)
- Green procurement of products such as detergents:, specific mention is made to the benefits related to the use of ISO Type I Ecolabelled products:
 - reduced human toxicity and ecotoxicity,
 - reduced eutrophication and oxygen demand in receiving waters,
 - reduced air pollution
 - reduced resource depletion and waste generation.
- Benchmark: 80 % of purchases being Ecolabelled.

The following table shows the link between the identified hotspots (BEMP and LCA) and the revised second proposal EU Ecolabel criteria. Where gaps have been identified in the current criteria new criteria are proposed based on the LCA and BEMP findings. Reference to other ecolabels for tourism has been made where relevant to the proposal. With the aim being to simplify the criteria set, those criteria which are not addressing environmental hotspots have been proposed to be deleted. The table only provide an indicative reference to the proposal. The details of the proposed criteria are addressed at the next section. In the table, criteria have been grouped in sub-sections according to the specific target they address.

Table 4. Link between the hotspots identified (BEMP and LCA) and the revised EU Ecolabel criteria. Criteria is either mandatory (M) or optional (O).

Section	Current criteria	Updated criteria	Environmental hotspot
Energy	Energy from renewable sources		
	M1. Electricity from renewable sources	M1. Procurement of electricity from a renewable electricity supplier	<p>Energy consumption</p> <p><u>LCA</u>: Electricity consumption represents the largest energy demand and source of GHG emissions. Respiratory inorganics is 68.5% due to electricity consumption and the contribution to climate change comes mainly from electricity consumption (69.4%). A 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.</p> <p><u>BEMP</u>: The best environmental practice for electricity from renewable sources is "To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier.</p> <p><u>EU Ecolabel</u>: It refers directly to procuring green electricity (from a genuine renewable electricity supplier). Revised criteria require 100% from RES, ambition level raised compare to in the current criteria which requires 50% RES.</p>
	O31. Renewable electricity generation	O26. On site self-generation of electricity through renewable energy sources	<p>Energy consumption</p> <p><u>LCA</u>: Electricity consumption represents the largest energy demand and source of GHG emissions. A 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.</p> <p><u>BEMP</u>: The best environmental practice for electricity from renewable sources is "To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier.</p> <p><u>EU Ecolabel</u>: It promotes the onsite renewable energy generation.</p>
	O32. Energy from renewable sources	O27. Heating energy from renewable energy sources	<p>Energy consumption</p> <p><u>LCA</u>: suggested energy production (power and thermal energy) is among the main burdening processes. In addition, the LCA literature review suggests that 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.</p> <p><u>EU Ecolabel</u>: to promote renewable sources for heating purposes.</p>
		O31. Procurement of labelled electricity	<p>Energy consumption</p> <p>This is an extension of criterion 1. However as the 100% is addressed at the revised criterion it is suggested to encourage the procurement of Ecolabelled electricity which is considered to have additional environmental values related the promotion and development of renewable energy source consumption projects.</p>
M2. Coal and heavy oils	M2. Coal and heavy oils	<p>Energy consumption</p> <p><u>LCA</u>: suggested energy production (power and thermal energy) is among the main burdening processes, and acidification as one of the main environmental impacts related to fuel consumption. In addition, the LCA literature review suggests that 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.</p>	

Section	Current criteria	Updated criteria	Environmental hotspot
			<p><u>BEMP</u>: The most significant portion of energy consumption relates to space heating (31%) and water heating (17%). "... Gas- and oil-fired boilers do not represent best practice with respect to heating and cooling sources..."</p> <p><u>EU Ecolabel</u>: It poses restrictions on coal/heavy oil as a heating sources</p>
	049. Swimming pool heating with renewable energy sources	043. Swimming pool heating with renewable energy sources	<p>Energy consumption</p> <p><u>BEMP/LCA</u>: in general heating from renewable energy sources is promoted.</p> <p>We understood that swimming pool heating is a common practice in cold weather areas in order to meet quality standards expected by consumers. As we cannot ban this practice, we think that it would be important to promote that this is done through the use of renewable energy sources.</p>
Efficient appliances/systems			
	M3. Efficiency and heat generation	M3. Efficient space and water heating appliances	<p>Energy consumption</p> <p><u>LCA</u>: Concerning energy use, near to 78% of the total energy use during an assumed lifetime of 50 years, comes from the operation phase.</p> <p><u>BEMP</u>: The most significant portion of energy consumption relates to space heating (31%) and water heating (17%). "Gas- and oil-fired boilers and individual room air-conditioning units do not represent best practice with respect to heating and cooling sources. However, where they are installed, the highest seasonal energy efficiency ratio, for example reflected in an 'A' rated European Energy Label, <u>should be sought for all new appliances</u>"</p> <p><u>EU Ecolabel</u>: Efficient appliance requirement for new acquisitions.</p>
	M4. Air conditioning	M4. Efficient air conditioning appliances	<p>Energy consumption</p> <p><u>BEMP</u>: Among the most significant portion of energy consumption relates to space heating (31%) and space cooling (15%). "...Where they are installed, the highest seasonal energy efficiency ratio, for example reflected in an 'A' rated European Energy Label, <u>should be sought for all new appliances</u>."</p> <p><u>EU Ecolabel</u>: Efficient appliance requirement for new acquisitions.</p>
	M9. Energy efficient light bulbs	M9. Energy efficient light bulbs	<p>Energy consumption</p> <p><u>BEMP</u>: lighting represents a 12% of the total energy consumption. Best environmental practice for lighting is: "To install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural light and time."</p> <p><u>EU Ecolabel</u>: Requires a progressive replacement of lamps by efficient lamps (including LED) in order to not produce unnecessary waste.</p>
	M10. Outside heating appliances	M10. Outside heating appliances	<p>Energy consumption</p> <p>Although no specific guidance on outside heating appliances where provided by BEMP/LCA there is a clear relation with the energy consumption. It is generally seen by stakeholders as a waste of energy.</p> <p><u>EU Ecolabel</u>: Total restriction of outside heating appliances.</p>
	033. Boiler energy efficiency	029. Efficient space and water heating appliances	<p>Energy consumption</p> <p><u>EU Ecolabel</u>: It promotes the use of most efficient HVAC systems in agreement with LCA/BEMP recommendations specified above.</p>

Section	Current criteria	Updated criteria	Environmental hotspot
	035. District heating	031. Efficient heating generation	<p>Energy consumption</p> <p>Cogeneration or Combined Heat and Power generation, both on-site and off-site (district heating), has a significant potential for saving primary energy in the energy transformation process. The International Energy Agency has addressed the assessment of the CHP through cost-benefit analysis in two reports released in 2008 and 2009 (IEA, 2008 and IEA 2009). Some of the main conclusions were that CHP can reduce CO₂ emissions arising from new generation in 2015 by more than 4% (170 Mt/year), while in 2030 this saving increases to more than 10% (950 Mt/year). These savings are attained due to a more efficient process (recovery of waste heat) together with a decrease of transmission and distribution losses, since the energy transformation is produced closer to the consumption centres (distributed generation).</p> <p><u>EU Ecolabel</u>: To promote district heating and cogeneration in order to save on primary energy consumption</p>
	036. Cogeneration		
	037. Heat pump	032. Heat pump	<p>Energy consumption</p> <p><u>BEMP</u> recognises that heat pumps can be beneficial for reducing energy consumption. BEMP recommends the installation of “efficient (e.g. ecolabelled) heat pumps for heating and cooling, or where possible ground water cooling”. This is in line with the revised EU Ecolabel criteria.</p>
	041. Air conditioning	035. Efficient air conditioning appliances	<p>Energy consumption</p> <p><u>BEMP</u>: specifies that air conditioning systems should be energy efficient, properly maintained and appropriately used.</p> <p><u>EU Ecolabel</u>: The current criterion ensures that the system used is efficient.</p>
	044. Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumbler and office equipment	041. Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumbler and office equipment	<p>Energy consumption</p> <p>Use of efficient appliances has been highlighted by BEMP and LCA review as practice to reduce the energy consumption during the use phase.</p> <p>This is in line with the proposed criteria. Higher energy classes are required in line with regulation update and market availability.</p>
Energy audit, monitoring and maintenance			
	M5. Energy efficiency of buildings	M5. Energy performance internal audits for buildings	<p>Energy consumption</p> <p><u>LCA</u>: Recommended installation of energy meters in hotels and continuous monitoring, as a tool to better identify previously hidden energy consumption sources.</p> <p><u>BEMP</u>: The BEMP is to “undertake an <u>energy audit and monitor energy consumption</u> across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficiency improvement options and to ensure that all equipment is maintained through appropriate periodic inspection”.</p> <p><u>EU Ecolabel</u>: It requires internal energy audit and implementation of at least one recommendation annually.</p>
	M7. Switching off heating or air conditioning	M7. Switching off heating or air conditioning	<p>Energy consumption</p> <p><u>LCA</u>: Concerning energy use, near to 78% of the total energy use during an assumed lifetime of 50 years, comes from the operation phase. Energy saving policy recommended.</p> <p><u>BEMP</u> outlines that information should be provided to guests to encourage switching off of air conditioning where</p>

Section	Current criteria	Updated criteria	Environmental hotspot
			appropriate. EU Ecolabel : Staff training and guest information is considered an important part of the policy to reduce energy consumption.
	M8. Switching off lights	M8. Switching off lights	Energy consumption LCA : Energy saving policy recommended. BEMP lighting represents a 12% of the total energy consumption. BEMP outlines that information should be provided to guests to encourage switching off of lights where appropriate. EU Ecolabel : Staff training and guest information is considered an important part of the policy to reduce energy consumption.
	034. Boiler NOx	030. Water Based Space Heater NOx emissions	Energy consumption BEMP : There is no specific BEMP guidance for setting limits for boiler NOx emissions. However, <u>regular maintenance of all HVAC equipment is encouraged</u> . This is the line taken in the revised EU Ecolabel criteria.
	039. Thermoregulation	034. Thermoregulation	Energy consumption BEMP is to encourage the installation of heat recovery systems where possible. “To minimise energy consumption from HVAC systems by installing <u>zoned temperature control</u> and controlled ventilation with heat recovery (ideally controlled by CO ₂ sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics. This is in line with the revised EU Ecolabel criteria. Revised criteria are partially aligned to Greenleaders scheme and additionally those applicants that have invested in building insulation in order to not heat the rooms during winter are proposed to be awarded.
Automatic systems/devices to decrease energy consumption			
	038. Heat recovery	033. Heat recovery	Energy consumption BEMP is to encourage the installation of heat recovery systems where possible. “To minimise energy consumption from HVAC systems by installing <u>zoned temperature control</u> and controlled ventilation with <u>heat recovery</u> (ideally controlled by CO ₂ sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics. This is in line with the revised EU Ecolabel criteria.
	042. Automatic switching-off of air conditioning and heating systems	036. Automatic switching-off of air conditioning and heating systems	Energy consumption BEMP : Generally, automatic switching off of heating and cooling systems is encouraged as a method of saving energy and maximising the output of these systems. This is in line with the proposed criteria.
	047. Automatic switching off lights in tourist	042. Automatic switching off lights and household air	Energy consumption BEMP : “for all rooms and corridor areas to have intelligent lighting control. For small enterprises where automatic lighting control in rooms may not be practical, the best practice is to install appropriately positioned signs reminding

Section	Current criteria	Updated criteria	Environmental hotspot
	accommodation	conditioners in tourist accommodation	guests to switch off lights (as required in EU Flower criteria for accommodation: EC, 2009).” BEMP specifically refers to EU Ecolabel. It is proposed to retain this criterion.
	O50. Automatic switching off outside lights	O40. Automatic switching off outside lights	Energy consumption BEMP: To install zoned and appropriately sized compact fluorescent and LED lighting with <u>intelligent control based on motion</u> , natural-light and time. In line with the proposed criteria.
	Removed criteria		
	M6. Window Insulation	-----	BEMP: No specific guidance on window insulation has been identified as BEMP, although ‘good building insulation’ is stated as being necessary. EU Ecolabel: With the aim to simplify the criteria and due to the difficulty to specify appropriate degree of insulation or equivalent to double glazing it is proposed to remove this criterion. However, in the proposed criterion 5 which is proposed to be more stringent proposes the use of EN 16247-2:2014 Energy audits - Part 2: Buildings which cover the building envelope aspects (renovation of windows, added insulation, etc.). These aspects shall be checked annually and a recommendation has to be implemented depending on the results obtained.
	O40. Energy performance audit	-----	It is proposed to remove this criterion on the basis that its current formulation is not practical and it is felt that the revised proposed mandatory criterion to be ambitious enough.
	O43. Bioclimatic architecture	-----	Removed on the basis that there are no BEMP guidelines and this requirement is not applicable to existing buildings.
	O45. Hand driers with sensors	-----	Removed on the basis that there are no BEMP guideline. The environmental impact of these may not be significant in a large hotel.
	O46. Refrigerator positioning	-----	Removed. There is no specific BEMP guidance for refrigerator positioning, only general information on the preference for energy efficient equipment and its maintenance.
Water	Efficient water devices		
	M11. Water flow from taps and showers	M10. Water flow from taps and showers	Water consumption BEMP: Water use in tourist accommodation has been identified as a significant environmental aspect. It is estimated that water can account for approximately 10% of utility bills in hotels, but this can vary considerably across different types of accommodation and is dependent on the facilities offered (for example a swimming pool or laundry facilities). There is a real opportunity for tourist accommodations to better manage water consumption, reducing their environmental burden and potential high cost of water use. BEMP for water flow is “to minimise water consumption through the installation of <u>low-flow taps and showers</u> , shower-timer controls, and low- and dual-flush WCs.” The EU Ecolabel criterion is currently in line with this.

Section	Current criteria	Updated criteria	Environmental hotspot
	M13. Urinal flushing	M12. WC and Urinal flushing	<p>Water consumption</p> <p><u>BEMP</u> advises the avoidance of continuous flushing of urinals. The EU Ecolabel criterion is currently in line with this. However with the aim to simplify the criteria text and that WCs are more frequently used than urinals, it is proposed to merge this criterion with current criterion 54 WCs flushing. Best practice for WC flushing is to “minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs”.</p>
	O54. WC flushing		
	O53. Water flow from taps and showerheads	O43. Water flow from taps and shower heads	<p>Water consumption</p> <p><u>BEMP</u>: for water flow is “to minimise water consumption through the installation of <u>low-flow taps and showers</u>, shower-timer controls, and low- and dual-flush WCs.”</p> <p>The EU Ecolabel criterion is currently in line with this. Additionally, a requirement on labelled taps and shower heads has been proposed.</p>
	O55. Dishwasher water consumption	O44. Dishwasher water consumption	<p>Water consumption</p> <p><u>BEMP</u> Selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption is best practice.</p> <p>The EU Ecolabel criterion is in line with this for dishwasher use. For the revised proposal, it is proposed to align the water consumption thresholds to the benchmarks identified at the respective Ecodesign directives.</p>
	O56. Washing machine water consumption	O45. Washing machine water consumption	
	O62. Water saving urinals	O54. Water saving urinals and toilets	<p>Water consumption</p> <p><u>BEMP</u> measures are outlined as the “Installation or retrofitting of controlled-flush or <u>waterless urinals</u>”.</p> <p>This corresponds with the existing EU Ecolabel criterion. In addition, a requirement on labelled urinals and toilets has been proposed. The title has been reworded to reflect the change</p>
Automatic devices and/or procedures to decrease water consumption			
	M12. Waste bins in toilets	M11. Wastewater management	<p>Water consumption & wastewater management</p> <p><u>BEMP</u>: Water use in tourist accommodation has been identified as a significant environmental aspect. It is estimated that water can account for approximately 10% of utility bills in hotels, but this can vary considerably across different types of accommodation and is dependent on the facilities offered (for example a swimming pool or laundry facilities). <u>BEMP</u> does not provide specific guidance on the provision of waste bins in toilets, but rather outlines best that practice for waste water management. Bins in toilets prevent the use of toilet flushing unnecessarily and can reduce water and energy related to wastewater treatment</p> <p>The EU Ecolabel criterion is currently in line with this.</p>
	M15. Correct wastewater disposal		
	M14. Changing towels and sheets	M13. Changing towels and sheets	<p>Water consumption</p> <p><u>BEMP</u>: Efficient housekeeping operations, such as implementation of a bedclothes and towel re-use scheme or employing water saving cleaning methods (such as turning off taps when cleaning or only flushing toilets as required) can reduce water usage. A high turnaround of towels and sheets within a tourist accommodation site gives rise to a</p>

Section	Current criteria	Updated criteria	Environmental hotspot
			significant environmental impact. <u>EU Ecolabel</u> is to “encourage guests to re-use towels and bin liners” by “prominent notices for guests advising on specific measures, including towel and bedclothes re-use”.
	051. Use of rainwater and recycled	041. Use of alternative water sources	Water consumption <u>BEMP</u> for the use of rain and recycled water is to “install a grey water recovery system that recovers grey water for use in indoor processes (e.g. toilet flushing) following treatment or exterior processes (e.g. irrigation), or a rainwater collection system that uses rainwater for indoor purposes.” Alternative water sources help conserve water, lower energy usage from water treatment facilities, and reduce stress on sewage. <u>EU Ecolabel</u> revised criterion has been partially aligned to Tripadvisor Greenleaders to allow more comprehensive criteria which cover other types of alternative water sources in line with BEMP.
	052. Automatic watering systems for outside areas	042. Efficient irrigation	Water consumption <u>BEMP</u> specifies that water consumption for irrigation should be minimised. <u>EU Ecolabel</u> promotes the use of automatic system and the training of the staff to carry out efficient irrigation.
	059. Swimming pool cover	046. Swimming pool cover	Water consumption <u>BEMP</u> for the operating of swimming pools does suggest the correct use of pool covers to reduce heat loss. The <u>EU Ecolabel</u> criterion is currently in line with this for the use of pool covers.
	061. Indication on water hardness	047. Indication on water hardness	Water consumption & Toxicity derived from chemical consumption <u>BEMP</u> suggests that “in addition to training and signage, clear marking of fill levels on spray bottles can reduce the incidence of incorrect dilution. Dilution volumes should be adjusted for water hardness.” This is covered in the <u>EU Ecolabel</u> criterion.
	-----	049. Swimming pool backwashing	Water consumption <u>BEMP</u> suggests optimising backwash procedures to ensure water loss is minimised. It is therefore suggested that a new, optional, criterion is developed to fulfil these BEMP requirements.
	Removed		
	57. Tap water temperature and flow	-----	Removed. With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that this criterion is removed as impact of this is likely to be small compared to other activities in a tourist accommodation sites and there are already mandatory and optional criteria addressing tap flow.
	58. Shower timers	-----	Removed. With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that this criterion is removed as impact of this is likely to be small compared to other activities in a tourist accommodation sites and there being no specific BEMP guidance shower timers. There are already mandatory and optional criteria addressing tap/shower flow.
	60. De-icing	-----	Removed. With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that this criterion. Additionally, we understood that I propose to delete this criterion as very often de-icing of roads to the hotel is not under the responsibility of the tourism accommodation. It is suggested to remove this criterion

Section	Current criteria	Updated criteria	Environmental hotspot
	63. Indigenous species outdoor planting	-----	With the aim being to simplify the criteria and due to the relation with potential savings during irrigation for adapted vegetation, this requirement has been included in revised criterion 46. Efficient irrigation.
Detergents and disinfectants	Chemical use dosage optimisation		
	M16. Disposal Point (CSS)	M14. Chemical toilet disposal point	Chemicals use <u>BEMP</u> primarily relates to minimising the use of chemicals on site and specific mention is made to the benefits related to the use of <u>Ecolabelled and ISO Type I chemical product</u> . Among the <u>benefits</u> are the following: <u>reduced human toxicity and ecotoxicity, reduced eutrophication and oxygen demand in receiving waters, reduced air pollution and reduced resource depletion and waste generation</u> . <u>BEMP</u> refers directly to Criterion 16: Chemical toilet disposal point as an indicator for best environmental management of outdoor areas in campsites.
	064. Detergents	050. Detergents and toiletries	Chemicals use <u>BEMP</u> suggests a benchmark of excellence for the use of detergents, which specifies that “at least 70% of the purchase volume of chemical cleaning products (excluding oven cleaners) for dish washing and cleaning are Ecolabelled. This criterion is in line with the <u>BEMP</u> guideline.
	068. Swimming pools: Dosage of disinfectants or natural/ecological swimming pools	051. Swimming pools: Dosage of disinfectants or natural/ecological swimming pools	Chemicals use <u>BEMP</u> for swimming pools outlines best practice measures as: a. Installation of, or conversion of an existing pool to, a natural pool. b. Installation of automatic dosing. This is directly in line with the existing EU Ecolabel criteria.
	070. Organic gardening	052. Organic gardening	Chemicals use <u>BEMP</u> suggests minimising the use of pesticides and other chemicals throughout the tourist accommodation. This corresponds with existing EU Ecolabel criteria.
	071. insect and pest repellents	053. Insect and pest repellents	Chemicals use <u>BEMP</u> highlights that pesticide use should generally be reduced – as is encouraged by the EU Ecolabel criteria.
	Removed		
	M17. Disinfectants	-----	Chemicals use This criterion is in line with the <u>BEMP</u> guideline of minimising the use of chemicals on site.
	65. Indoor and outdoor paints and varnishes	-----	Chemicals use This criterion is in line with the <u>BEMP</u> guidelines of minimising the use of chemicals on site and to consider air quality in general.
	66. Car washing in	-----	Removed. With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that

Section	Current criteria	Updated criteria	Environmental hotspot
	special areas (campsite only)		this criterion is removed as impact of this is likely to be small compared to other activities in a tourist accommodation sites and there being no specific BEMP guidance car washing.
	67. Alternative BBQ lighters	-----	Removed. With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that this criterion is removed as impact of this is likely to be small compared to other activities in a tourist accommodation sites and there being no specific BEMP guidance artificial barbeque lighters.
	69. Mechanical cleaning	-----	Removed. With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that this criterion is removed as impact of this is likely to be small compared to other activities in a tourist accommodation sites and there being no specific BEMP guidance on mechanical cleaning.
Waste	Reduce waste		
	M20. Disposable products	M16. Single-use products	<p>Waste generation.</p> <p><u>LCA</u> concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total. LCA studies suggest that separate waste collection and domestic solid waste composting would contribute to a <u>reduction in quantity</u> of waste produced. <u>BEMP</u> guidance highlights the importance of waste prevention, and uses the avoidance of single-use items as a way of achieving this: "Prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps, shampoos) and by buying cleaning agents in concentrated and bulk form – and by careful management of procurement volumes." This is in line with the EU Ecolabel criterion which restricts the use of a number of disposable products.</p>
	M21. Breakfast packaging	M17. Food service waste management	<p>Waste generation</p> <p><u>BEMP</u> "Prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps, shampoos) and by buying cleaning agents in concentrated and bulk form – and by <u>careful management of procurement volumes.</u>"</p> <p><u>LCA</u> revealed that concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total. <u>EU Ecolabel</u> criterion aim of is to manage the waste derived from food services (packaging and food).</p>
	086. Refillable bottles	055. Beverage provision	<p>Waste generation.</p> <p><u>BEMP</u> is to minimise residual waste generation by implementing waste prevention, and recommend avoiding procurement of single-use items. <u>EU Ecolabel</u>: It is suggested to merge this criterion, that addresses disposable drink containers, with the criterion that encourages the tourist accommodation to offer beverages in returnable/refillable bottles (Criterion 86: Returnable or refillable bottles).</p>
	086. Refillable bottles		

Section	Current criteria	Updated criteria	Environmental hotspot
	Re-use goods		
	76. Used textiles, furniture and other products	056. Used textiles, furniture and other products	Waste generation. <u>BEMP</u> promotes the importance of the waste hierarchy: Reduce/Re-use/Sort/Recycle. EU Ecolabel criterion is in line with this.
	Sort waste		
	M18. Waste separation by guests	M15. Waste separation	Waste generation. <u>LCA</u> concerning waste generation, the biggest generation of waste products occurs during both the <u>operation</u> and the demolition phase. Organic solid waste represents 79.9% of the total. LCA studies suggest that separate waste collection and domestic solid waste composting would contribute to a reduction in quantity of waste produced. <u>BEMP</u> is “to minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting water recycling services”. <u>EU Ecolabel</u> criteria addressing waste separation have been merged as both are tackling the same topic. The criteria are in line with BEMP and LCA suggestions.
	M19. Waste separation		
	Recycle waste		
	072. Composting	054. Composting	Waste generation. <u>LCA</u> concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total. LCA studies suggest that separate waste collection and <u>domestic solid waste composting</u> would contribute to a reduction in quantity of waste produced. <u>BEMP</u> is “to minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting water recycling services”. <u>EU Ecolabel</u> : It is suggested that the criterion is aligned to Trip advisor Greenleaders and to award an extra point to those applicants that compost biodegradable materials and that compost the waste produced by guests.
	Removed		
	074. Fat/oil disposal	-----	Removed. With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that this criterion is removed as impact of this is likely to be small compared to other activities in a tourist accommodation sites and there being no specific BEMP guidance on fat/oil disposal. However if local authorities collect this residue, the

Section	Current criteria	Updated criteria	Environmental hotspot
			applicant must separate this according to criteria on waste separation.
	075. Run-off from car parks (campsite only)	-----	Removed. With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that this criterion is removed as impact of this is likely to be small compared to other activities in a tourist accommodation sites and there being no specific BEMP guidance on run-off from car parks.
Other services	Traffic and transport		
	M23. Public transportation	M19. Environmentally preferable means of transport	Transportation LCA revealed that transport system has a higher impact than accommodation services itself in the acidification (AP) and abiotic depletion (ADP) categories. Furthermore, a LCA suggested that guest transportation (from home to home), could include more effective actions to promote the most environmentally-sound forms of transport, as well as discourage the most polluting ones. BEMP guidance highlights the importance of encouraging the use of public transport. EU Ecolabel to promote preferable means of transport.
	077. Regulation of campsite traffic (campsite only)	057. tourist accommodation traffic management	Transportation BEMP is to regulate traffic effectively to ensure minimisation of emissions. EU Ecolabel criterion is in line with this.
	078. Campsite generated traffic (campsite only)		
	084. Bicycles	062. Bicycles	Transportation BEMP does not specify best practice for the number of bikes which should be provided to guests in tourist accommodation. However, low-carbon forms of transport (including bikes) should be encouraged. Revised EU Ecolabel criteria suggest to require a higher number of bicycles available than current criterion.
	Durable goods		
	087. Use of rechargeable products	063. Rechargeable products	Procurement & Waste generation BEMP outlines that “Single-use disposable items are avoided where possible (e.g. plastic bin liners are avoided, toner/ink cartridges are refilled and rechargeable batteries are selected).” EU Ecolabel criterion is in line with this.
	088. Paper products	064. Paper products	Procurement & Waste generation BEMP encouraged minimisation of the use of resources, “especially paper and ink” and to “select environmentally certified materials and services (e.g. printing services)” where possible. Again, this is in line with the current EU Ecolabel criteria for paper products.
	089. Durable goods	065. Durable goods	Procurement & Waste generation In general, BEMP specifies that eco-labelled products (those certified to Type I schemes such as the EU Ecolabel) are preferable - environmental impacts have been considered and are minimised compared to other products on the

Section	Current criteria	Updated criteria	Environmental hotspot
			market.
Vegetation landscaping			
	080. Unsealed surfaces (campsite only)	058. Unsealed surfaces (campsite only)	Water pollution & wastewater management BEMP references EU Ecolabel requirements as good practice in management of outside areas, including Criterion 80: Unsealed surfaces. Unsealed surfaces allow an increase of water filtration and diminution of water pollution leading to optimised wastewater treatment. EU Ecolabel promotes unsealed surfaces.
	081. Roof landscaping	059. Roof and façade landscaping	Water consumption BEMP suggests that “To maximise on-site biodiversity through planting of native species, installation of green or brown roofs and walls, and to minimise water consumption for irrigation.” EU Ecolabel criterion is in line with this.
Organic and local procurement			
	090. Local food products	066. Local food products	Procurement BEMP for kitchens in tourist accommodation is to “assess food and drink supply chains to identify environmental hotspots and key control points, including choice editing of menus to avoid particularly damaging ingredients (e.g. some out-of-season fruit), and selection of environmentally-certified products.” In general, it is considered best practice to source all products locally where possible
	091. Organic food	067. Organic food	Procurement BEMP for food provision refers to “choice editing of menus to avoid particularly damaging ingredients (e.g. some out of season fruit), and selection of environmentally-certified products.” Criterion on Organic food and criterion on Local products are in line with this.
Communication and education			
	82. Environmental communication and education	060. Environmental and social communication and education	General (energy, water, waste, chemical use, procurement, transport) BEMP is to “provide guests with interactive on-site education of environmental issues, including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles)”. This is in line with the current EU Ecolabel criterion for environmental communication and education.
Non environmental aspects			
	M22. No smoking in common areas	M18. No smoking in common areas	There is no BEMP for restricting smoking in tourist accommodation. However, for a service, such as tourist accommodation, the quality of the service provided is one of the main ways a business can distinguish itself in a highly competitive market. Restriction on smoking was considered important to be addressed at EU Ecolabel for TAS&CSS.
	083. No smoking	061. No smoking in rooms	

Section	Current criteria	Updated criteria	Environmental hotspot
	-----	M20. Fundamental principles and rights at work	Although the EU Ecolabel is predominantly concerned with environmental issues, the EU Ecolabel Regulation 66/2010 which governs the scheme does allow social aspects to be considered, where they are relevant. Therefore it is proposed to include the employment requirements addressed in other environmental schemes for tourism which cover minimum national legislation and further.
	Removed		
	079. Trolleys for guests (campsite only)	-----	Removed. With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement.
	085. Pick up service	-----	Removed. Public transportation it is considered a best practice compare to the use of pick up service. As public transportation is promoted in the mandatory criterion which is proposed to be more comprehensive, it is suggested to remove this criterion.
	092. Indoor air quality	-----	Removed. With the aim being to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement. Furthermore, there could be an overlap between criteria as EU Ecolabelled detergents, all purpose cleaners; paints etc... are already addressed in other criteria.
General management	Maintenance and monitoring		
	M24. Maintenance and servicing of boilers and air conditioning systems	M21. Maintenance and servicing of boilers and air conditioning systems and refrigeration systems	General (energy, water) <u>BEMP</u> and <u>LCA</u> are to “ensure that all equipment is maintained through appropriate periodic inspection”. This still reflects the previous criterion for TAS and CSS, and as such is still applicable.
	M28. Energy and water consumption data	M24. Data collection	General (energy, water) <u>BEMP</u> includes: “Undertake an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficient improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection. <u>BEMP</u> is that “appropriate environmental indicators are measured at the process level and associated with best practise techniques”. This is in line with the proposed merged criteria.
	M29. Other data collection		
	096. Energy and water meters	071. Energy and water meters	General (energy, water) <u>BEMP</u> encourages the use of meters to best identify possible efficiency improvements – this is reflected in the EU Ecolabel criterion.
	Information and training		
	M26. Staff training	M22. Staff training	General (energy, water, waste, chemical use, procurement, transport)

Section	Current criteria	Updated criteria	Environmental hotspot
			BEMP recommends that sustainability issues are included in basic training for all levels of staff, to highlight the importance of ensure waste reduction and water, and energy minimisation.
	M27. Information to guests	M23. Information to guests	General (energy, water, waste, chemical use, procurement, transport) BEMP suggests that guests should be provided with “interactive on-site education of environmental issues, including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles)”. This criterion primarily focuses on providing information about the environmental objectives of the tourist accommodation, although other criteria are also in place which relate to this BEMP , including: criterion on switching off heating or air conditioning, criterion on switching off lights, etc...
	M30. Information appearing on the eco-label	M25. Information appearing on the eco-label	General (energy, water, waste, chemical use, procurement, transport) We propose that the ‘information appearing on the Ecolabel’ is added to the details of what the certificate and logo will contain, which is found in the User Manual. This would provide a potential licensee with details of the text that will appear on the EU Ecolabel logo that they could then use for promotional purposes following the award of a licence. The current text is considered to be valid for the revised criteria.
Third party certification			
	O93. EMAS or ISO registration	O68. EMAS or ISO registration of the tourist accommodation	General (energy, water, waste, chemical use, procurement) BEMP encourages the formulation of an environmental management plan – as is encouraged through this revised criterion
	O94. Suppliers EMAS or ISO registered	O69. EMAS registration or ISO certification of suppliers	General (energy, water, waste, chemical use, procurement) BEMP encourages the formulation of an environmental management plan – as is encouraged through this revised criterion.
	O95. Subcontractors comply with mandatory criteria	O70. Compliance by subcontractors with mandatory criteria	General (energy, water, waste, chemical use, procurement) In addition to the provision of food and leisure activities (including saunas and swimming pools), BEMP includes provisions for effective management of laundry services. This is in line with the revised EU Ecolabel criteria.
Removed			
	M25. Policy setting and environmental program	-----	General (energy, water, waste, chemical use, procurement, transport) BEMP and LCA highlight the importance to establish an environmental policy, set target and monitor adherence to these. In line with the EU Ecolabel criteria.
	O97. Additional environmental	-----	General (energy, water, waste, chemical use, procurement) BEMP encourages the installation of an environmental management plan, in line with the proposed EU Ecolabel

Section	Current criteria	Updated criteria	Environmental hotspot
	actions		criterion. Social actions are proposed to be covered in this criterion.

Discussion points

The revised proposal keeps the current structure which is the one that stakeholders are familiar with. However, it is proposed to introduce a slight rearrangement of several criteria in order to better reflect the environmental aspects that criteria are addressing. It is expected to have a better idea of which criteria are going to be kept or removed in a later stage, thus the modification in the structure is suggested to be introduced for the next version of this document.

Stakeholders are invited to give their view concerning the idea of a potential reordering of several criteria according to the environmental aspect they are related to.

2 Examination of specific criteria

Summary:

This section updates the current criteria to reflect changes since the adoption of the current set of TAS and CSS criteria:

- Legislative change.
- Revision or introduction of new EU Ecolabel criteria.
- CB experience of using the criteria.
- Feedback from the initial questionnaire sent to a wide variety of organisations and government bodies engaged in the tourist accommodation industry.
- Improved knowledge of best environmental practice.

The aim of this section is not to justify the current criteria, but to identify any updates required (including any deletions) by reference to new Regulations or Directives, revised Best Environmental Management Practice (BEMP) and other market changes which have occurred since 2008. Stakeholder feedback has also been taken into account in determining whether changes need to be made.

After each criterion, questions have been formulated for stakeholder feedback and discussion during consultation. These have been developed using feedback from Competent Bodies, relating to the proposals for updated criterion and additional research information.

Finally, the impact of any proposed changes is outlined in Section 2.2.

2.1 Changes to existing criteria

The section below outlines the following for each of the existing EU Ecolabel criteria for TAS and CSS:

1. **The existing EU Ecolabel criteria.**
2. **An assessment of the criteria against the following information:**
 - Regulation: changes to regulation (where applicable) since the previous revision of the TAS and CSS criteria.
 - Feedback: feedback from stakeholders as a result of consultation and information from various organisations and government bodies engaged in the tourist accommodation industry.
 - BEMP: existing scientific literature, outlining the best environmental management practices for tourist accommodation. A further analysis of BEMP compared to the EU Ecolabel can be found in Annex I.
 - Other updates: including the revision of development of EU Ecolabel criteria for other product groups, relevant information from technical analysis (other than BEMP) including LCA reviews, or comparison with other ecolabels.
3. **Proposed updates to criteria** (where applicable). Where changes have been made, these have been underlined.
4. **Relevant stakeholder comments and further research after AHWG1:** relevant stakeholder comments and follow up research are included under this section.

5. Proposed update: including a brief justification and second proposal for the revised criterion. Where changes have been made, these have been underlined.

2.1.1 Mandatory criteria related to energy

2.1.1.1 Criterion 1: Electricity from renewable sources

Current criterion:

Electricity from renewable sources

At least 50% of the electricity used for all purposes shall come from renewable energy sources, as defined in Directive 2001/77/EC of the European Parliament and of the Council.

This criterion does not apply to tourist accommodation that has no access to a market that offers electricity generated from renewable energy sources.

Binding contract restrictions (such as the provision of penalties) of at least 2 years for the change of power supplier can be considered as 'no access' to a market that offers electricity generated from renewable energy sources.

Assessment and verification: The applicant shall supply a declaration from (or the contract with) the electricity supplier indicating the nature of the renewable energy source(s), the percentage of electricity supplied that is from a renewable source, documentation on the boilers (heat generators) used, if any, and an indication of the maximum percentage that can be supplied. According to Directive 2001/77/EC, renewable energy sources shall mean renewable non-fossil energy sources (wind, solar, geothermal wave, tidal, hydro power, biomass, landfill gas, sewage treatment plant gas and biogases). In cases where the tourist accommodation has no access to a market that offers energy from renewable energy sources, documentation demonstrating the request for renewable energy has to be supplied.

Regulation:

Directive 2001/77/EC was repealed by Directive 2009/28/EC of the European Parliament and of the Council in January 2012 [OJ L 140, 5.6.2009, p.16]. The definition of renewable sources shall therefore be taken from Directive 2009/28/EC:

'Energy from renewable sources' means energy from renewable non-fossil sources, namely wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases."

This definition should be clearly outlined in the user guide for tourist accommodation.

Feedback:

General feedback suggests that this criterion can be difficult to achieve, especially for small businesses which tend to be sensitive to energy price changes. However, there is also a mix of opinions as to whether the limit for the current requirement (*50% of the electricity used for all purposes*) should be increased or decreased, and no conclusions could be drawn from this.

BEMP:

The best environmental practice for electricity from renewable sources is "To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier."

In this instance, the EU Ecolabel refers directly to procuring green electricity (from a genuine renewable electricity supplier). The current EU Ecolabel criterion is therefore in line with this best practice guidance.

Proposed updates:

This criterion should be updated in line with the revised Directive, but otherwise no change is proposed.

First proposal for revised criterion:

Electricity from renewable sources

At least 50% of the electricity used for all purposes shall come from renewable energy sources, as defined in Directive 2009/28/EC [OJ L 140, 5.6.2009, p.16] of the European Parliament and of the Council.

This criterion does not apply in cases where the tourist accommodation has no access to a market that offers electricity generated from renewable energy sources.

Binding contract restrictions (such as the provision of penalties) of at least 2 years, for the change of power supplier can be considered as 'no access' to a market that offers electricity generated from renewable energy sources.

Assessment and verification: The applicant shall supply a declaration from (or the contract with) the electricity supplier indicating the nature of the renewable energy source(s), the percentage of electricity supplied that is from a renewable source, documentation on the boilers (heat generators) used, if any and an indication of the maximum percentage that can be supplied. According to Directive 2009/28/EC, renewable energy sources shall mean renewable non-fossil sources namely wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.

In cases where the tourist accommodation has no access to a market that offers energy from renewable energy sources, documentation demonstrating the request for renewable energy has to be supplied.

Relevant stakeholder comments and further research after AHWG1

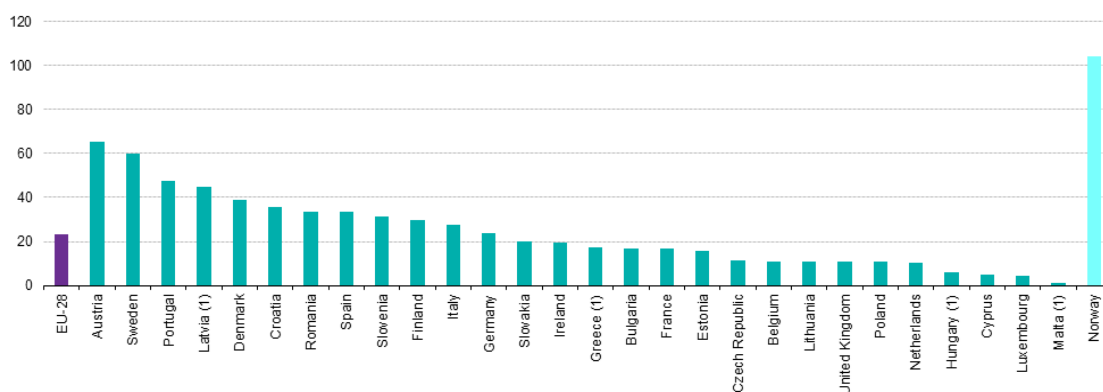
Stakeholder comments received during and after the First Ad Hoc Working Group are noted in Annex III. The following issues are considered important and therefore require further research:

- ***Minimum of the electricity from renewable energy sources required***

Several stakeholders from associations and NGO's are in favour of requiring that 100% of electricity is procured from renewable sources. They refer to a company operating in Belgium which is a 50% green company owing to the fact that half of the consumers have a 100% green contract. *"If you are not one of these green consumers, then you don't have a 50% green contract, but a 0% green contract."*

The following figure shows the average production of electricity from renewable sources at European level. The scenarios of the different European countries are very disparate. The EU - 28 average share of electricity from renewable sources in 2012 was just above 20 % of the total electricity generated.

Figure 4. Proportion of electricity generated from renewable sources, 2012. (% of gross electricity consumption)



Source: Eurostat (tsdcc330)

However, the Directive 2009/28/EC on the promotion of the use of energy from renewable sources allows the use of disclosure tools, such as ‘guarantees of origin’, for electricity from renewable energy sources (‘RES-GO’). Guarantees of Origin are tradable certificates under the RECS (Renewable Energy Certificate System) regime. Each Guarantee of Origin (GO) is based on national legislation and each national legislation has to be in line with Directive 2009/28/EC.

All European GOs provide information on:

- *The energy source and technology used.*
- *The location of the power plant, its size and the date on which it started its operations.*
- *Whether the power plant received any support – and if so, what kind.*

(For more information see: <http://www.buy-smart.info/about-labels/green-power/ok-power-label/ueberschrift>)

Guarantees of origin are more and more widely used. Although Malta is at the low end of the EU-28 in terms of its share of renewable energy, it is able to import guarantees of origin. It is also possible to establish cooperation with third countries. Although this is the current practice in some countries, there may still be several European countries where there are fewer suppliers that provide a green offer to end users.

Domestic electricity suppliers in several European countries have been reviewed in order to assess the share of electricity from renewable energy sources that the greenest of them supply. The following tables and figure list most of the electricity suppliers from the countries reviewed. Considering the data from British domestic suppliers, only one company is able to provide 100% of electricity from renewable sources, while six companies provide a share over 50%, which is the current threshold.

Table 5. UK domestic electricity suppliers.

UK Domestic Electricity Suppliers		Supplier	% renewable
Supplier	% renewable	M&S Energy (SSE)	24.0
Atlantic (SSE)	24.0	npower	15.0
British Gas	15.0	Oink Energy (Green Energy)	55.0
Co-operative Energy	68.0	Ovo Energy	26.1
e.on	12.0	Sainsbury Energy (British Gas)	15.0
EBICo (SSE)	24.0	Scottish Gas (British Gas)	15.0
Ecotricity	86.5	Scottish Hydro-Electric (SSE)	24.0
EDF Energy	13.5	ScottishPower	16.9
First:Utility	11.9	Southern Electric (SSE)	24.0
Flow Energy	11.9	Spark Energy	8.3
Good Energy	100.0	SSE	24.0
Green Energy	55.0	SWALEC (SSE)	24.0
Green Star Energy	95.0	Utilita	12.0
isupplyenergy	11.9	Utility Warehouse (npower)	15.0
LoCO2 Energy	40.0	Woodland Trust Energy (Ovo Energy)	26.1

Source: <http://www.electricityinfo.org/suppliers.php> (8 April 2014)

The national offer in Spain is more promising (see Table 6), where 14 suppliers, that provide the majority of electricity at the national level, are able to provide 100% of electricity from renewable sources to the end user. In addition, there are several companies that offer green electricity in Spain via the guarantees of origin system. (e.g. Scandinavian Electricity).

Table 6. Spanish domestic electricity suppliers and their renewable energy supply capacity.

Aduriz Energía (14,30%,2012)	Electra Energía (13,90%,2010)	Gas Natural Fenosa (48,10%,2013)
Aguas de Barbastro Energía (Data not provided)	ElectraComercialCentelles (13,90%,2010)	Holaluz.com (100,00%,-)
AlcanziaEnergía (15,10%,2012)	Eléctrica de Cádiz (14,30%,2011)	Iberdrola (64,40%,2012)
Aracan (40,60%,2013)	Eléctrica de Moscoso (Data not provided)	Incogas (Data not provided)
Audax (20,30%,2013)	EléctricaSerosense (14,30%,2011)	LersaEnergia (20,30%,2013)
Aura Energía (20,30%,2013)	EléctricaSollerense (100,00%,2013)	Lumisa (20,30%,2013)
BassolsEnergía (Data not provided)	Empresa de Alumbrado Eléctrico de Ceuta (Data not provided)	Nexus Energía (73,10%,2013)
CHC Energía (Data not provided)	Enara (100,00%,2013)	OCU Compra Colectiva de Energía (100,00%,-)
Comercializadora de Referencia PVPC (20,00%,2013)	Endesa (31,70%,2013)	Orus Energía (13,90%,2010)
Comercializadora Suministros Especiales Alginetenses (13,90%,2010)	Enercoluz (100,00%,2013)	PVPC Preciovoluntario
Compañía Escandinava de Electricidad en España (100,00%,2010)	Enérgya-VM (100,00%,2013)	Som Energia Cooperativa (100,00%,-)
Dreue Empresa Energética (20,30%,-)	Estabanell Energía (13,90%,2010)	Syder (100,00%,-)
E.ON (45,20%,2013)	Evergreen Eléctrica, S.L.(20,30%,2013)	TUR Gas (Data not provided)
EDP (100,00%,-)	Factor Energía (45,60%,2013)	Última compra colectiva OCU (Data not provided)
Electra Aduriz (Data not provided)	FenieEnergia(14,30%, 2010)	UniEléctrica (100,00%,-)
Electra AvellanaComercial (13,90%,2013)	GalpEnergia (15,10%,2012)	Vertsel Energia (15,10%,2012)
Electra Caldense (Data not provided)	Gesternova (100,00%,2011)	Watium (15,10%,2012)
Electra del CardenerEnergía (Data not provided)	GoiEner (100,00%,-)	Zencer, Sociedad Cooperativa Andaluza (100,00%,-)

Source: <http://www.comparatarifasenergia.es/comercializadora-de-energia>

Further data was gathered from the RE-DISS project website, which archives documents that provide guidelines on how to implement and correctly use guarantees of origin for member states. European countries such as Austria, which was the very first country in Europe to introduce a mandatory scheme for disclosing details of electricity generation, and Belgium, reveal a wide spectrum of electricity suppliers which provide 100% of electricity from renewable sources (See more information: <http://phase1.reliable-disclosure.org/documents/>).

While other countries, such as Ireland, show a scarcity of green suppliers to end users (See figure 5).

Figure 5. Electricity suppliers in Ireland (2012)

Supplier*	Coal (%)	Oil (%)	Gas (%)	Peat (%)	Renewables (%)	Other (%)	CO2 emissions (tCO ₂ /MWh)
Airtricity (All-island)	11.0	1.1	44.1	4.0	39.5	0.3	0.357
Airtricity (Northern Ireland)	0.9	0.1	3.5	0.3	95.2	0.0	0.029
Bord Gáis Energy (All-Island)	15.9	1.6	64.3	5.7	12.0	0.5	0.519
Firmus Energy (Northern Ireland)	15.9	1.6	64.5	5.8	11.7	0.5	0.520
Viridan (All-Island)	16.1	1.6	64.5	5.8	11.5	0.5	0.523
Viridan (Northern Ireland)	15.4	1.5	61.4	5.6	15.7	0.4	0.498
ESB IE (All Island)	17.0	1.7	67.8	6.1	6.9	0.5	0.550
ESB IE (Northern Island)	17.0	1.7	67.8	6.1	6.9	0.5	0.551
NIE (Northern Ireland)	17.3	1.7	69.0	6.3	5.2	0.5	0.560
All Island	16.0	1.6	64.1	5.8	12.1	0.4	0.519

* Where suppliers operate on an all-island basis their combined Irish and Northern Irish fuel-mix is listed along with the fuel-mixes associated with their Northern Irish electricity supply licences.

(Source: <http://phase1.reliable-disclosure.org/documents>)

- **Derogation "no access" to a market that offers electricity generated from renewable energy sources**

Several stakeholders asked to remove the clause that derogates applicants that do not have access to a market that offers electricity generated from renewable energy sources. However, at the last EUEB in November 2014, it was specifically claimed by a Member State that the removal of that derogation could prevent them from applying for the EU Ecolabel for Tourist Accommodation.

As previously mentioned European Guarantees of Origin (GO) are tradable certificates and can be used in any EU member state (plus Norway and Switzerland) that has implemented the GO system guidelines. However, at the current time, not all member states have registered on the GO registry, which could explain the small offering of electricity from renewable energy sources in several countries in the EU, and especially in overseas territories.

The report, Qualitative Assessment of Disclosure and GO systems [C. Raimundo, 2014], summarises the results of the analysis carried out on the implementation of Disclosure and GO systems across the following countries:

AT,BE,BG,HR,CY,CZ,DK,EE,FI,FR,DE,GR,HU,IS,IE,IT,LV,LT,LU,NL,NO,PL,PT,SI,ES,SE,CH,GB

In terms of RES-GO systems:

- 25 of the 29 domains had a RES-GO system in place and operational, with legislation in place and a competent body assigned for the issuing, transferring and cancelling of GO.

-
- 4 of the 29 domains had a RES-GO system “almost in line”. Reasons for that were:
 - Registry in place but no RES-GO had been issued (Estonia);
 - RES- GO were issued based on the 2001 directive and not the new RES-Directive (Luxemburg);
 - GO were issued for internal use but was not cancelled (Poland);
 - RES-GO system was created by law but was not operational (Portugal).

All 29 domains have some level of RES-GO system in place with Competent Bodies assigned for issuing, transferring and cancelling GO, although not all meet the requirements of the RES Directive.

The scenario indicates that the "no access" to market derogation is less and less necessary due to the current implementation of RES-GO systems and the growth of importing GO in remote areas or countries where access to renewable energy generation is less. However, to impose a mandatory criterion on the procurement of green electricity might prevent some countries applying for the EU Ecolabel for Tourist Accommodation due to the lack of access to domestic suppliers providing green energy to end users in several European countries (as claimed by a MS stakeholder and deduced from the data found in RE-DISS project documents for some countries, e.g. Ireland).

- **Price of 100% green electricity**

Information from independent 'price-comparing tools' on the German, Belgian and Dutch markets is available. Random postcodes and electricity consumption of an average household were introduced in the research tool in order to obtain comparative prices.

Belgium, Flanders, VREG (Flemish regulator), V-test

<http://www.vreg.be/nl/doe-de-v-test-voor-gezinnen>
City: 9000 Gent.

Consumption: 4000 kWh.

All best ranked are 100% green.

Germany, Verivox

<http://www.verivox.de/strompreisvergleich/>

Town: Taunusstein, near Wiesbaden

Consumption: 3500 kWh.

Two best placed are green.

Netherlands,

<http://www.energieleveranciers.nl/stroom-vergelijken>

Place: Amsterdam

Amount: average household consumption

Five out of the seven first are 100% green electricity contracts.

Experts of EKOenergy which is an eco label scheme for green electricity have provided the following information concerning the cost of green electricity:

- On the wholesale market, the price of green electricity consists of the price of electricity (electrons) + the price of Guarantees of Origin to prove its renewable origin. For the last 5 years, there has been an almost continuous over-supply of GO where the supply exceeds demand. This means that the market value is very low. For example, GO for 'bulk products' (e.g. Nordic hydropower) are traded at less than 10 eurocents per MWh which means that the green premium is significantly lower than 1% of the power price.

- On the retail market, the price difference depends on many factors. One factor is competition. In competitive markets, the seller would not be able to sell green electricity at a premium that was much higher than the price paid for it on the wholesale market.
- For the consumer, the electricity price is the sum of the electricity price (with or without GO) + the price of the grid (transmission costs) + taxes. This further reduces the 'weight' of the GO price, such that the extra price for green electricity represents only a very small component of the total electricity price.
- Subsidies for renewables are/were successful subsidies. They have helped to create the renewables market. In the last 10 years, the price of renewable energy production has fallen drastically and, in many markets, it is now competitive.
- **Eco labelled electricity**

Widely used standards, such as Greenhouse Gas Protocol and LEED (Leadership in Energy & Environmental Design), encourage consumers to buy labelled electricity. The European versions of the LEED Standard for building certification explicitly recommend the use of EKOenergy labelled electricity or the equivalent. Buildings aiming at LEED certification qualify for extra points if the electricity used in that building is EKOenergy certified. (See more information on: <http://www.ekoenergy.org/ecolabel/other-standards/>)

Several ecolabels for green electricity exist across Europe, including national ecolabels. (See table Table 7. RES-E ecolabels in Europe.).

Table 7. RES-E ecolabels in Europe.

	Germany	Ok-power label: www.ok-power.de
	Austria	Umweltzeichen: http://www.umweltzeichen.at
	Germany	The Technical Inspection Association (TÜV): www.tuev-nord.de www.tuev-sued.de
	Germany	TTUheV G Srüunde)r Strom Label e.V: www.gruenerstromlabel.de
	Italy	100% green energy: www.centopercentoverde.org
	The Netherlands	The Milieukeur label – www.milieukeur.nl
	Sweden	Bra Miljöval (English: "Good Green Buy" or "Good Environmental Choice") www.snf.se/bmv/index.cfm

	Switzerland	http://www.naturemade.ch
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Source: Green Public Procurement Electricity Technical Background Report (2011) and basic internet research

Stakeholders representing EKOenergy claimed that technically, EKOenergy can be bought and sold in all EU countries and beyond and that the label proves that the electricity comes from renewable energy sources and that the power plants fulfil extra sustainability criteria. (See: <http://www.ekoenergy.org/extras/ekoenergy-comic/>)

Proposed update:

Given that companies providing 100% electricity from renewable energy sources are widely spread across Europe and the price difference between renewable and traditional sources is not significant, it is proposed to increase the requirement as requested by several stakeholders. Against this background, it is proposed to increase the threshold required to 100% or highest available share on the market of domestic electricity suppliers. It is proposed to keep the clause 'no access' to the market in order to allow applicants in different parts of Europe and overseas territories to apply for the EU Ecolabel.

The title of the criteria has been modified in order to reflect the aim of the criterion, which is to purchase electricity from a green electricity supplier.

The assessment and verification section has been modified in order to clarify the types of documents that need to be provided.

BEMP

The best environmental management practice is: *“To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine renewable electricity supplier.”*

Proposed update:

The proposal attempts to recognise the situation as it currently exists in many parts of Europe and beyond. Hopefully, the mandatory criterion will encourage some 'demand pull' for the generation of electricity from renewable sources and the optional criteria will reward those applicants who have invested in on-site generation. Reference to ecolabelled electricity will be addressed in the optional criteria (See criterion 32).

Current proposal for revised criterion:

Criterion 1: Procurement of electricity from a renewable electricity supplier

100% of the electricity procured shall come from renewable energy sources, as defined in Directive 2009/28/EC [OJ L 140, 5.6.2009, p.16] of the European Parliament and of the Council.

Tourist accommodations that have no access to a supplier that offers the 100% electricity generated from renewable energy sources shall procure from the available supplier offering the highest share from renewable energy sources.

This criterion does not apply to a tourist accommodation that has no access to a supplier that offers electricity generated from renewable energy sources.

Assessment and verification: The applicant shall supply a declaration from (or the contract with) the electricity supplier indicating the nature of the renewable energy source(s) and the percentage of electricity supplied that is from a renewable source.

In case the tourist accommodation has no access to a national supplier that offers electricity from renewable energy sources, documentation on the domestic suppliers operating at national level has to be supplied and a declaration from (or the contract(s) with) the electricity supplier(s) indicating the nature of the renewable energy source(s) and the percentage of electricity supplied that is from a renewable source.

According to Directive 2009/28/EC, renewable energy sources shall mean renewable non-fossil sources, namely wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.

2.1.1.2 **Criterion 2: Coal and heavy oils**

Current criterion:

Coal and heavy oils

No heavy oils having a sulphur content higher than 0.1% and no coal shall be used as an energy source. Coal for decorative fireplaces is excluded from this criterion.

This criterion only applies to tourist accommodations that have an independent heating system.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, indicating the nature of the energy sources used.

Feedback:

Very little stakeholder feedback was received regarding this criterion. One comment suggested that zero sulphur content should be encouraged.

However it was considered relevant to keep restrictions on the use of non-renewable sources of energy for heating purposes. LCA suggested energy production (power and thermal energy) is among the main burdening processes, and acidification as one of the main environmental impacts related to fuel consumption. In addition, the LCA literature review suggests that 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.

BEMP stated that Gas- and oil-fired boilers do not represent best practice with respect to heating and cooling sources...

With regard to the sulphur content of heavy oils, although there were found several commercialized products with lower percentage of sulphur grade (see this example from Belgium: <http://www.informazout.be/fr/veel-gestelde-vragen>), the evidence suggested that those products are not commonly available in Europe. Therefore, it is proposed that criterion will remain as:

First for revised criterion:

Coal and heavy oils

No heavy oils having a sulphur content higher than 0.1% and no coal shall be used as an energy source. Coal for decorative fireplaces is excluded from this criterion.

This criterion only applies to tourist accommodations that have an independent heating

system.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, indicating the nature of the energy sources used.

Relevant stakeholder comments and further research after AHWG1

There was limited stakeholder feedback for this criterion and no additional information was provided concerning access to a low sulphur grade heating oil supply (see stakeholder comments received during and after the first AHWG noted in Annex III). The proposed criterion remains the same (Criterion 2).

2.1.1.3 Criterion 3: Efficiency and heat generation

Current criterion:

Efficiency and heat generation

If a new heat generating capacity is installed within the duration of the eco-label award, it shall be a high efficiency cogeneration unit (as defined by Article 3 and Annex III of Directive 2004/8/EC of the European Parliament and of the Council, a heat pump or an efficient boiler. In the latter case, the efficiency of such a boiler shall be of 4 stars (ca. 92% at 50 °C and 95% at 70 °C), measured according to Council Directive 92/42/EEC, or according to relevant product norms and regulations for those boilers not covered by this Directive.

Existing hot-water boilers fired with liquid or gaseous fuels as defined in Directive 92/42/EEC shall comply with efficiency standards at least equivalent to 3 stars as stated in the Directive. Existing cogeneration units shall comply with the definition of high efficiency in Directive 2004/8/EC. The efficiency of boilers excluded from Directive 92/42/EEC shall comply with the manufacturer's instructions and with national and local legislation on efficiency, but for such existing boilers (with the exception of biomass boilers) an efficiency lower than 88% shall not be accepted.

Assessment and verification: The applicant shall provide a technical specification from those responsible for the sale and/or maintenance of the boiler indicating its efficiency.

Regulation:

Directive 2004/8/EC [OJ L 52, 21.2.2004, p. 50] has been repealed by Directive 2012/27/EU of the European Parliament and of the Council [OJ L 315, 14.11.2012, p.1], as of 5 June 2014. This update should be reflected in the new criterion.

A new energy labelling system for space heating, of A to G, will be introduced from September 2015 and A+ to F from September 2017. Reference to the latest energy labelling implementation measure may need to be incorporated in the criterion.

Directive 92/42/EEC (which defined efficiency standards as Star ratings) has been repealed by Commission Regulation (EU) No 813/2013 of 2 August 2013 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for space heaters and combination heaters using electricity, gas or liquid fuels [OJ L 239, 6.9.2013 p. 136]. In this Regulation, the equivalent boilers are defined as 'boiler space heaters'. Additional definitions related to these are found in Annex I of the Directive.

The star rating system has been replaced by letters in Commission Delegated Regulation (EU) No 811/2013 of 18 February 2013 (supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of space heaters, combination heaters, packages of space heater, temperature control and solar device and packages of combination heater, temperature control and solar device [OJ L 239, 6.9.2013 p. 1]). This A-G scale applies to space heaters and the packaging of space heaters up to 70 kW heat output, using electricity, gas or liquid fuels. Equivalent measurements on ecodesign and energy labelling are currently under development for solid fuel boilers within Lot 15.

It is important to consider the implications of a change in Regulation from a star rating system to a letter rating system (A+ to F). The EU Ecolabel must consider how the Regulation affects (1) those tourist accommodation sites that meet the current criterion and have installed a 3-star boiler or equivalent, and (2) those tourist accommodation sites that install new boilers which comply with any updated labelling system. This will be an ongoing issue and will need to be resolved through discussion at the AHWG meetings. The revised criterion has not been changed to reflect this, but may be altered as a result of stakeholder feedback.

Feedback:

A number of comments were received for this criterion, which can be summarised as those related to:

- Difficulties in complying with the part of this criterion that applies to existing appliances, due to costs in replacing boilers.
- Suggestions that this criterion should be tightened, and that all boilers (including existing ones) should meet the standards for 4-star boilers.
- Comments about updating the efficiency measures (*ca. 92% at 50 °C and 95% at 70 °C*).
- Suggestions that the efficiency measures for 3-star boilers should be specified as per 4-star boilers.

BEMP:

The best environmental practice for heat generation is:

*“Gas- and oil-fired boilers and individual room air-conditioning units do not represent best practice with respect to heating and cooling sources. However, where they are installed, the highest seasonal energy efficiency ratio, for example reflected in an ‘A’ rated European Energy Label, should be sought for all new appliances. Information should be sought on full and **part load** efficiency.”*

Other updates:

A new set of EU Ecolabel criteria for water based heating systems/units is about to be adopted and this sets minimum energy efficiency criteria calculated as “seasonal space heating energy efficiency”. It is proposed to use these criteria.

Proposed update:

The following update is proposed:

First proposal for revised criterion:

Efficiency and heat generation

If a new space heating generating capacity has been installed within the duration of the EU Ecolabel Licence, it shall be a high efficiency cogeneration unit (as defined by Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012), or have seasonal space heating energy efficiency in accordance with the values in the table below:

Heat Generator Technology	Minimum Seasonal Space Heating Efficiency
All heaters except solid biomass boiler heaters	$\eta_s \geq 98\%$
Solid biomass boiler heaters	$\eta_s \geq 79\%$

If a new water heater is installed within the duration of the EU ecolabel award, its efficiency shall be (A, A+, A++), measured according to Regulation EU No 812/2013 with regard to the energy labelling of water heaters, hot water storage tanks and packages of water heater and solar device.

Existing hot-water boilers fired with liquid or gaseous fuels as defined in Directive 92/42/EEC shall comply with efficiency standards at least equivalent to 3 stars as stated in the Directive. The efficiency of boilers excluded from Directive 92/42/EEC shall comply with the manufacturer's instructions and with national and local legislation on efficiency, but for such existing boilers (with the exception of biomass boilers) an efficiency lower than 88% shall not be accepted.

Assessment and verification: In respect of boiler and co-generation units, the applicant shall provide a technical specification from those responsible for the sale and/or maintenance of the boiler/unit indicating its efficiency. Seasonal space heating energy efficiency shall be calculated in accordance with the procedures set out in Criterion 1a of Commission Decision of 28 May 2014, establishing the criteria for the award of the EU Ecolabel for water-based heaters.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG are noted in Annex III. It was highlighted at the meeting that the Minimum Seasonal Space Heating Efficiency requirement might not be stringent enough for heat pump heaters.

EU Ecolabel for water based space heaters addresses GHG emission limits of the different water-based heaters. Limits are proposed for each technology expressed in grams of CO₂-equivalent per kWh of heating output. The values are calculated using the Total Equivalent Warming Impact (TEWI) formulas. (See more information on: [OJ L 164/93, 3.6.2014]).

Regarding the GWP value of the refrigerant, the market penetration of non-HFC refrigerants (CO₂, hydrocarbons) is currently very low: approximately 95% of heat pumps on the European market use HFC refrigerants, according to the report of the Environmental Investigation Agency [EIA 2012]. HFC blends featuring low GWP are able to reach a GWP of 150 with the addition of unsaturated HFCs (partially fluorinated olefins or HFOs), mainly HFC-1234yf (refrigerant) and HFC-1234ze (foam blowing agent, aerosol propellant, and refrigerant). According to the Preparatory study for a review of Regulation (EC) No 842/2006 on certain fluorinated greenhouse gases [Preparatory study for a review of Regulation (EC) No 842/2006, 2011], unsaturated HFCs are not yet commercially available on the scale required. In conclusion, a strict GWP threshold would limit the procurement options too much.

In terms of energy efficiency, market segmentation indicates that 40 – 50% of air-water heat pumps are able to reach the SCOP of 3.1 ($\eta_s = 120\%$) and 5 – 10% of air-water heat pumps attain a SCOP of 3.6 ($\eta_s = 140\%$) (estimations based on a sample of 780 models of air-water heat pumps provided by German Federal Office of Economics and Export Control, [BAFA]. These market shares should be taken into consideration, together with the market penetration of heat pumps in the market for heat generators, which is less than 10% (3% according to EHPA – European Heat Pump Association). Also sales of air-water heat pumps compared to the total sales of heat pumps, which is 55% (according to the data from EHPA)

needs to be considered. The analysis is focused on the air-water technology, which has a lower efficiency compared to water-water heat pumps, but it is cheaper and easier to install.

Regulation (EU) No 814/2013 with regard to ecodesign requirements for water heaters and hot water storage tanks [OJ L 239/162, 6.9.2013] provides benchmarks for the best-performing water heaters and hot water storage tanks available on the market at the time this Regulation came into force.

Table 8. Benchmarks for water heating energy efficiency of water heaters

Declared load profile	3XS	XXS	XS	S	M	L	XL	XXL	3XL	4XL
Water heating energy efficiency	35 %	35 %	38 %	38 %	75 %	110 %	115 %	120 %	130 %	130 %

Source: Regulation (EU) No 814/2013

The benchmarks correspond to the following energy classes, according to Regulation EU No 812/2013 with regard to the energy labelling of water heaters, hot water storage tanks and packages of water heater and solar device [OJ L 6.9.2013, 239/83]:

Table 9. Water heating energy efficiency classes of water heaters, categorised by declared load profiles, η_{wh} in %

	3XS	XXS	XS	S	M	L	XL	XXL
A ⁺⁺⁺	$\eta_{wh} \geq 62$	$\eta_{wh} \geq 62$	$\eta_{wh} \geq 69$	$\eta_{wh} \geq 90$	$\eta_{wh} \geq 163$	$\eta_{wh} \geq 188$	$\eta_{wh} \geq 200$	$\eta_{wh} \geq 213$
A ⁺⁺	$53 \leq \eta_{wh} < 62$	$53 \leq \eta_{wh} < 62$	$61 \leq \eta_{wh} < 69$	$72 \leq \eta_{wh} < 90$	$130 \leq \eta_{wh} < 163$	$150 \leq \eta_{wh} < 188$	$160 \leq \eta_{wh} < 200$	$170 \leq \eta_{wh} < 213$
A ⁺	$44 \leq \eta_{wh} < 53$	$44 \leq \eta_{wh} < 53$	$53 \leq \eta_{wh} < 61$	$55 \leq \eta_{wh} < 72$	$100 \leq \eta_{wh} < 130$	$115 \leq \eta_{wh} < 150$	$123 \leq \eta_{wh} < 160$	$131 \leq \eta_{wh} < 170$
A	$35 \leq \eta_{wh} < 44$	$35 \leq \eta_{wh} < 44$	$38 \leq \eta_{wh} < 53$	$38 \leq \eta_{wh} < 55$	$65 \leq \eta_{wh} < 100$	$75 \leq \eta_{wh} < 115$	$80 \leq \eta_{wh} < 123$	$85 \leq \eta_{wh} < 131$
B	$32 \leq \eta_{wh} < 35$	$32 \leq \eta_{wh} < 35$	$35 \leq \eta_{wh} < 38$	$35 \leq \eta_{wh} < 38$	$39 \leq \eta_{wh} < 65$	$50 \leq \eta_{wh} < 75$	$55 \leq \eta_{wh} < 80$	$60 \leq \eta_{wh} < 85$
C	$29 \leq \eta_{wh} < 32$	$29 \leq \eta_{wh} < 32$	$32 \leq \eta_{wh} < 35$	$32 \leq \eta_{wh} < 35$	$36 \leq \eta_{wh} < 39$	$37 \leq \eta_{wh} < 50$	$38 \leq \eta_{wh} < 55$	$40 \leq \eta_{wh} < 60$
D	$26 \leq \eta_{wh} < 29$	$26 \leq \eta_{wh} < 29$	$29 \leq \eta_{wh} < 32$	$29 \leq \eta_{wh} < 32$	$33 \leq \eta_{wh} < 36$	$34 \leq \eta_{wh} < 37$	$35 \leq \eta_{wh} < 38$	$36 \leq \eta_{wh} < 40$
E	$22 \leq \eta_{wh} < 26$	$23 \leq \eta_{wh} < 26$	$26 \leq \eta_{wh} < 29$	$26 \leq \eta_{wh} < 29$	$30 \leq \eta_{wh} < 33$	$30 \leq \eta_{wh} < 34$	$30 \leq \eta_{wh} < 35$	$32 \leq \eta_{wh} < 36$
F	$19 \leq \eta_{wh} < 22$	$20 \leq \eta_{wh} < 23$	$23 \leq \eta_{wh} < 26$	$23 \leq \eta_{wh} < 26$	$27 \leq \eta_{wh} < 30$	$27 \leq \eta_{wh} < 30$	$27 \leq \eta_{wh} < 30$	$28 \leq \eta_{wh} < 32$
G	$\eta_{wh} < 19$	$\eta_{wh} < 20$	$\eta_{wh} < 23$	$\eta_{wh} < 23$	$\eta_{wh} < 27$	$\eta_{wh} < 27$	$\eta_{wh} < 27$	$\eta_{wh} < 28$

Source: Regulation EU No 812/2013

Proposed update

Against this background, a criterion on GHG emissions is proposed for water-based heat pumps in line with the current EU Ecolabel criterion for water-based heaters. This criterion is formulated as a maximum TEWI value, which factors in both seasonal space heating energy efficiency and leakages and end of life of the refrigerant. Hence, the TEWI formula works as mechanism to reward those heat pumps using low GWP refrigerants with a lower threshold for seasonal space heating energy efficiency.

The value TEWI of 150 gCO₂/kWh heat output corresponds to heat pumps that

- i. fulfil the RES Directive criterion to be considered as renewable source (SCOP = 2.6 for the average climate conditions of Strasbourg), and;
- ii. uses CO₂ (GWP = 1) as refrigerant in a ratio charge (kg) /heat output (kW) equal to 1/3.

The same heat pump, using R410A (GWP = 2000), would need a SCOP of 3.1 ($\eta_s = 120\%$) and thus a stricter threshold of energy efficiency to offset GHG gases emissions due to refrigerant leakages. For the refrigerant R507 (GWP=3985), another common HFC blend, it would require a SCOP of 3.6 ($\eta_s = 140\%$) to fulfil the TEWI of 150 gCO₂/kWh heat output.

Therefore, the selectivity of this criterion is ensured by means of two parameters: GWP of the refrigerant and the seasonal space energy efficiency.

Nevertheless, any attempt at setting a TEWI limit value as part of this set of criteria could present issues for the assessment and verification section, for both applicants and Competent Bodies, and therefore, a second option is proposed based on seasonal space heating energy efficiency and a bonus-malus as a function of the GWP of the refrigerant.

Table 10. Proposed η_s thresholds and equivalent TEWI values

GWP	η_s (%) for TEWI=150 gCO ₂ /kWh	Proposed η_s thresholds (%)	TEWI for the proposed η_s
[0 – 500]	103 - 107	107	143 - 148.4
(500 – 1000]	107 - 110	110	144.5 - 149.4
(1000 – 2000]	110 - 119	120	137.7 - 147.4
> 2000	120 - 140	130	137.6

For water heating boilers, the thresholds are based on Regulation (EU) No 814/2013, which provides indicative benchmarks for the best-performing water heaters and hot water storage tanks available on the market at the time this Regulation came into force.

Against this background, it is apparent that those heaters whose declared load profile are higher than S, are more energy efficient. Particularly M and larger load profiles' benchmarks are closer to the upper limits of the A energy class ranges. The reason behind this is that heat pumps and solar technologies are present in this market segment, bringing about a relevant improvement of the energy efficiency. Therefore, the following distinctions are needed for a fair selection:

- Declared load profile ≤ S: energy class A
- Declared load profile > S: boilers: energy class A
- Declared load profile > S: heat pumps: energy class A+

The criterion title has been adapted in order to better reflect the purpose of the requirement.

Current proposal for revised criterion:

Criterion 3: Efficient space and water heating appliances

If a new space heating generating capacity is installed within the duration of the EU Ecolabel Licence, it shall be a high efficiency cogeneration unit (as defined by Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012), or have seasonal space heating energy efficiency in accordance with the values in the table below:

Heat Generator Technology	Minimum Seasonal Space Heating Efficiency
All heaters except solid biomass boiler heaters and heat pumps	$\eta_s \geq 98\%$

Solid biomass boiler heaters	$\eta_s \geq 79\%$		
Heat pump heaters (Option 1)		GWP	Proposed η_s thresholds (%)
		[0 – 500]	107
		(500 – 1000]	110
		(1000 – 2000]	120
		> 2000	130
Heat Generator Technology	GHG emission limits		
Heat pump heaters (Option 2)	150 g CO ₂ -equivalent/kWh heating output		

If a new water heater is installed within the duration of the EU Ecolabel licence, the efficiency shall be :

- Declared load profile $\leq S$: energy class A
- Declared load profile $> S$: boilers: energy class A
- Declared load profile $> S$: heat pumps: energy class A+

measured according to Regulation EU No 812/2013 with regard to the energy labelling of water heaters, hot water storage tanks and packages of comprising a water heater and a solar device.

Existing hot-water boilers fired with liquid or gaseous fuels as defined in Directive 92/42/EEC shall comply with efficiency standards at least equivalent to 3 stars as stated in the Directive. The efficiency of boilers excluded from Directive 92/42/EEC shall comply with the manufacturer's instructions and with national and local legislation on efficiency, but for such existing boilers (with the exception of biomass boilers) efficiency lower than 88% shall not be accepted.

Assessment and verification: In respect of boiler and co-generation units, the applicant shall provide a technical specification from those responsible for the sale and/or maintenance of the boiler/unit indicating its efficiency. Seasonal space heating energy efficiency shall be calculated in accordance with the procedures set out in Criterion 1a of Commission Decision of 28 May 2014, establishing the criteria for the award of the EU Ecolabel for water-based heaters.

2.1.1.4 **Criterion 4: Air conditioning**

Current criterion:

Air conditioning

Any household air conditioner bought within the duration of the eco-label award shall have at least Class A energy efficiency as laid down in Commission Directive 2002/31/EC [OJ L 86, 3.4.2002] or have corresponding energy efficiency.

Note: This criterion does not apply to air-conditioners that are appliances that can also use other energy sources, or to air-to-water and water-to-water appliances, or to units with an output (cooling power) greater than 12 kW.

Assessment and verification: The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system.

Regulation:

Directive 2002/31/EC was repealed from 1 January 2013 by Commission Delegated Regulation No 626/2011 of 4 May 2011 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of air conditioners [OJ L 178, 4.5.2011, p.1]. The energy efficiency class must therefore be classified following Annex II of this Regulation. The minimum efficiency from 1 January 2014 will be A+. There will be two higher classes: A++ and A+++.

Feedback:

Feedback suggested that this criterion should be updated with changes to legislation; this ties in with the change in Directive outlined above.

BEMP:

The best environmental practice for air conditioning is:

“To minimise energy consumption from HVAC systems by installing zoned temperature control and controlled ventilation with heat recovery (ideally controlled by CO₂ sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics.

*Where they are installed, the highest seasonal energy efficiency ratio, for example reflected in an 'A' rated European Energy Label, should be sought for all new appliances. Information should be sought on full and **part load** efficiency.”*

BEMP suggests that best practice is to seek air conditioning which meets the energy efficiency standards laid down by European regulation.

Other updates:

The new energy classes for air conditioning were introduced in January 2013. Given the recent introduction of the new Regulations, data on market penetration of these products is not available. According to Topten.eu, the best products available on the market already exceed the energy efficiency threshold by 20%. In addition, eight models are available on the European market classed A+++ both for cooling and heating (Topten.eu, 2014).

Proposed updates:

This criterion should be updated in line with the revised Directive, but otherwise no change is proposed. Feedback and BEMP support this. The previous criterion specified the highest class i.e. Class A. Therefore the proposal is that the updated criterion should be the highest class, which can vary from A to A+++ according to the type of air conditioner installed.

First proposal for revised criterion:

Air conditioning

Any household air conditioner bought within the duration of the EU Ecolabel Licence shall be the most energy efficient class as laid down in Regulation EU No 626/2011 supplementing Directive 2010/30/EU [OJ L 178, 4.5.2011, p.1] with regard to energy labelling of air conditioners or have corresponding energy efficiency.

Note: This criterion does not apply to air-conditioners that are appliances that can also use other energy sources, or to air-to-water and water-to-water appliances, or to units with an output (cooling power) greater than 12 kW.

Assessment and verification: The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG are noted in Annex III. Limited stakeholder feedback was received regarding this criterion. A stakeholder suggested that including a table listing the classes required for each type of air conditioner would improve clarity of the criterion.

Topten website, which is a consumer search tool for energy efficient appliances on the market, has been consulted in order to determine the highest energy classes for different types of air conditioners. The highest energy classes available on the market are listed in the table below.

Table 11. Energy efficiency class for air conditioners

Type	Energy efficiency class (cooling / heating)
Monosplit < 3kW	A+++/A+++
Monosplit 3-4 kW	A+++/A+++
Monosplit 4-5 kW	A+++/A++
Monosplit 5-6 kW	A+++/A+++
Monosplit 6-7 kW	A++/A+
Monosplit 7-8 kW	A++/A+
Monosplit > 8kW	A++/A++
Multi-split	A++/A+

Source: Topten, updated October 2014

Proposed update

In order to facilitate compliancy to the criterion, the above table listing the energy classes has been included in the criterion.

The criterion title has been adapted in order to better reflect the purpose of the requirement.

Current proposal for revised criterion:

Criterion 4: Efficient air conditioning appliances

Any household air conditioner bought within the duration of the EU Ecolabel Licence shall have at least the relevant energy classes in the table below as defined in Regulation EU No 626/2011 supplementing Directive 2010/30/EU [OJ L 178, 4.5.2011, p.1] with regard to energy labelling of air conditioners or have corresponding energy efficiency.

Type	Energy efficiency class (cooling / heating)*
Monosplit < 3kW	A+++/A+++
Monosplit 3-4 kW	A+++/A+++
Monosplit 4-5 kW	A+++/A++
Monosplit 5-6 kW	A+++/A+++
Monosplit 6-7 kW	A++/A+
Monosplit 7-8 kW	A++/A+
Monosplit > 8kW	A++/A++
Multi-split	A++/A+

* Or equivalent energy efficiency for Non EU applicants.

Note: This criterion does not apply to air-conditioners that are appliances that can also use other energy sources, or to air-to-water and water-to-water appliances, or to units with an output (cooling power) greater than 12 kW.

Assessment and verification: The applicant shall provide technical specifications showing

the relevant energy class from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system.

2.1.1.5 **Criterion 5: Energy efficiency of buildings**

Current criterion:

Energy efficiency of buildings

The tourist accommodation shall comply with the national legislation and local building codes related to energy efficiency and the energy performance of buildings.

Assessment and verification: the applicant shall provide the energy certification under Directive 2002/91/EC of the European Parliament and of the Council or where not available in the national implementation system, the results of an energy audit performed by an independent expert on the energy performance of buildings.

Regulation:

Directive 2002/91/EC was repealed in 2012 by Directive 2010/31/EU [OJ L 153, 18.5.2010, p.13]. Energy certification must therefore be provided under this new Directive.

Feedback:

A number of stakeholders were unsure about the verification stages of this criterion; it was suggested that examples of the types of documents used as evidence of compliance could be provided. In practice, the documentation for this criterion may vary (e.g. by country or region). It may therefore be beneficial for any User Manual developed for tourist accommodation to point the user towards a useful information source:

Further information about the energy efficiency of buildings (including energy audits) can be found at: http://ec.europa.eu/energy/efficiency/buildings/buildings_en.htm

One stakeholder also suggested that this criterion could be made mandatory for newly constructed buildings and optional for old ones.

BEMP:

The BEMP is to “undertake an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficiency improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection”.

Proposed updates:

The reference to Directive 2002/91/EC needs to be updated. Carrying out an energy audit is best practice and so this criterion will remain mandatory.

The proposed update for this criterion is:

First proposal for revised criterion:

Energy efficiency of buildings

The tourist accommodation shall comply with the national legislation and local building codes related to energy efficiency and the energy performance of buildings.

Assessment and verification: the applicant shall provide the energy certification under Directive 2010/31/EU [OJ L 153, 18.5.2010, p.13] of the European Parliament and of the Council or where not available in the national implementation system, the results of an energy audit performed by an independent expert on the energy performance of buildings.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG are noted in Annex III. Feedback from stakeholders suggested that the criterion would be difficult to comply with given the different age of buildings across tourist accommodation services, the significant cost of assessment and verification, and the variations in the way Directive 2010/31/EU [OJ L 153, 18.5.2010, p.13] has been implemented in each member state.

A stakeholder claimed that they already use software which measures consumption and identifies the potential for possible improvement in energy efficiency. They therefore do not see the need for an audit to identify something that has already been identified. Additionally, there is a contradiction between the text in the current criterion, which is a legal requirement, and the text in the verification section, which requests an audit or certification.

BEMP

The BEMP is: “undertake an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficiency improvement options”.

Proposed update

In order to recognise the importance of the auditing and monitoring process of the tourist accommodation’s environmental performance, it is proposed to include a requirement for an internal audit and implementation of the recommendations. Recognising the cost of this type of system, an internal audit is allowed for the mandatory criterion. However, the internal audit should comply with the principles and requirements of the main standards at European and international level. The standards EN 16247-1:2012 Energy audits - Part 1: General requirements and EN 16247-2:2014 Energy audits - Part 2: Buildings set the general criteria to carry out energy audits, and specific energy audit requirements in buildings. The standard also points out that the energy audit can be part of a site-wide energy management system, for which the standard ISO 50001 would apply. The standard covers heating, cooling, ventilation, lighting, domestic hot water, transportation systems (e.g. elevators, escalators and moving walkways) in buildings and processes, as well as appliances within the building. The standard also provides different examples of checklists to carry out the energy audit, for informative purposes, which may help the applicant, undertake an internal audit and that could be included at the user manual:

- Examples of checklists for energy audit field work in buildings;
- Examples of the analysis of energy use in buildings;
- Examples of analysis checklists for energy audits in buildings.

Current proposal for revised criterion:

Criterion 5: Energy performance internal audits for buildings

The tourist accommodation building/s shall be subject to an internal annual energy performance audit, according to the standards EN 16247-1 Energy audits - Part 1: General requirements and EN 16247-2 Energy audits - Part 2: Buildings, or equivalent, and implement at least one recommendation on improving the energy performance resulting from the annual audit.

Assessment and verification: Tourist accommodation shall provide to Competent Body the energy performance internal audit report, including the checklists used and data on the implemented recommendations each time the audit it is undertaken.

2.1.1.6 Criterion 6: Window insulation

Current criterion:

Window insulation

All windows in heated and/or air conditioned rooms and common areas shall have appropriate degree of thermal insulation according to the local regulations and climatic conditions and shall provide an appropriate degree of acoustic insulation. (This does not apply to rental caravans/mobile homes where these are not owned by the tourist accommodation management.)

All windows in heated and/or air conditioned rooms and common areas added or renovated after the acquisition of the Community eco-label shall comply with Directive 2002/91/EC (Articles 4, 5 and 6) and Council Directive 89/106/EEC and relative national technical regulations for their implementation

Assessment and verification: The applicant shall provide a declaration from a professional technician indicating compliance with this criterion supplying the thermal transmittance values (U-value). For windows complying with Directive 2002/91/EC, the applicant shall provide the energy certification or where not available in the national implementation system, a declaration from the constructor.

Regulation:

Directive 2002/91/EC was repealed in 2012 by Directive 2010/31/EU [OJ L 153, 18.5.2010, p.13]. All windows in heated and/or air conditioned rooms and common areas added or renovated after the acquisition of the EU Ecolabel shall comply with Directive 2010/31/EU (Articles 4, 5, 6 and 7). Council Directive 89/106/EEC was repealed by Regulation (EU) No 305/2011 [OJ L 88, 4.4.2011, p.5].

Feedback:

Stakeholder feedback was centred on two main points, both of which can be solved by updating the corresponding User Manual:

1. It was suggested that 'appropriate degree of thermal insulation according to the local regulations and climatic conditions' should be better clarified in the assessment and verification section.
2. Several stakeholders outlined that some buildings may be protected by local regulation (for example a building may be grade-I listed in the UK which can restrict any changes being made to the building, such as double glazing or the addition of secondary insulation). Although currently reflected in the criterion as 'local regulations' – this could be more clearly outlined in the Assessment and verification section.

BEMP:

No specific guidance on window insulation has been identified as BEMP, although 'good building insulation' is stated as being necessary.

Proposed updates:

The User Manual should better define 'appropriate degree of thermal insulation' to clarify this criterion – an example of this is suggested above (points 1 & 2 of feedback). The criterion itself should be updated to reflect the change of regulation, but no other update is required.

The updated criterion is as follows:

First proposal for revised criterion:

Window insulation

All windows in heated and/or air conditioned rooms and common areas shall have appropriate degree of thermal insulation according to the local regulations and climatic conditions and shall provide an appropriate degree of acoustic insulation. (This does not apply to rental caravans/mobile homes where these are not owned by the tourist accommodation management.)

All windows in heated and/or air conditioned rooms and common areas added or renovated after the acquisition of the EU Ecolabel shall comply with Directive 2010/31/EU (Articles 4, 5, 6 and 7) and Regulation (EU) No 305/2011 and relative national technical regulations for their implementation.

Assessment and verification: Where windows are insulated with double glazing or equivalent, a self-declaration is sufficient for the assessment and verification – this use of double glazing will also be checked on site.

Where, 'local regulations' (e.g. rules protecting historic buildings or areas of importance) may restrict the changes which can be made to the tourist accommodation site, the details of the local regulation (or equivalent) should be provided together with an explanation of how they affect the tourist accommodation.

If there is no insulation - or insulation less than double glazing or equivalent - a declaration from a professional shall be needed to explain how an appropriate degree of thermal and acoustic insulation is guaranteed. The applicant or a professional technician shall:

a. provide a description of the insulation features of its windows, or state that the windows have no insulation;

b. provide an explanation of the appropriateness of the insulation features according to climate and setting (in both summer and winter), including: a description of the tourist accommodations climate zone, a description of any shading elements (such as trees or other buildings) and a description of how thermal insulation is ensured.

c. provide a description of the surroundings, including noise levels. The accepted level of indoor noise is specified by the WHO (World Health Organisation), with a maximum noise level of 40 dB for comfort during the night (<http://www.who.int/docstore/peh/noise/Commnoise4.htm>). The explanation should outline how this is achieved. (Note, new double glazed windows can protect against noise up to 50 dB.)

d. in case of rooms and areas added or renovated after the acquisition of the EU Ecolabel, provide the Competent Body with proof of compliance with Directive 2002/91/EC (Articles 4, 5 and 6) and Council Directive 89/106/EEC.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG are noted in Annex III. Several stakeholders asked for further clarification of 'equivalent' in the assessment and verification section "Where windows are insulated with double glazing or equivalent".

Proposed update

With the aim to simplify the criteria and due to the difficulty to specify *appropriate* degree of insulation or *equivalent* to double glazing it is proposed to remove this criterion. However, in the proposed criterion 5 which is proposed to be more stringent proposes the use of EN 16247-2:2014 Energy audits - Part 2: Buildings which cover the building envelope aspects (renovation of windows, added insulation, etc.). These aspects shall be checked annually and a recommendation has to be implemented depending on the results obtained.

Current criterion:**Switching off heating or air conditioning**

If the heating and/or the air conditioning is not automatically switched off when windows are open, there shall be easily available information reminding the guest to close the window(s) if the heating or air conditioning is on. Individual heating/air conditioning systems acquired after the certification with the Community eco-label shall be equipped with an automatic switch off when windows are opened.

This criterion only applies to tourist accommodations that have heating and/or air conditioning.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with the text of the information to guests (if applicable).

This criterion does not require updating, and so it is proposed that no changes are made, with the exception of a minor correction to the English used. This is based on the following:

1. Very little stakeholder feedback was received regarding this criterion. Where feedback was received, this primarily suggested better clarification of what 'easily available information reminding the guest to close the window(s)' consists of. This could be better clarified.

Where information is provided to guests this should be visible – it may be, for example: included in information given to guests on arrival; included in any information pack, or equivalent, provided for guests in rooms or other accommodation; or may be in the form of a notice situated next to windows or the air conditioning/heating system.

One comment also suggested that air conditioning units which can be programmed to a determined temperature should be excluded. It is assumed, however, that providing relevant information to guests will optimise the use of any air conditioning units.

2. BEMP for the use of air conditioning focuses primarily on energy efficiency (covered in Criterion 4: Air conditioning). However, BEMP also outlines that information should be provided to guests to encourage switching off of air conditioning where appropriate. This is in line with current EU Ecolabel criterion.

It is therefore proposed that the criterion remain as:

First proposal for revised criterion:**Switching off heating or air conditioning**

If the heating and/or the air conditioning is not automatically switched off when windows are open, there shall be easily available information reminding the guest to close the window(s) if the heating or air conditioning is on. Individual heating/air conditioning systems acquired after the award of the EU Ecolabel shall be equipped with an automatic switch off when windows are opened.

This criterion only applies to tourist accommodation that has heating and/or air conditioning.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with the text of the information provided to guests (if applicable).

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG are noted in Annex III. There were limited comments for Criterion 7 during and after the first AHWG. However, a stakeholder noted that both; Criterion 7: Switching off heating or air conditioning, and Criterion 8: Switching off lights, relate to automatic switching-off devices which are expensive to install. The respondent suggested that staff training often worked as well or even better than these devices.

Another stakeholder suggested the possibility that air conditioners are switched off when guests leave the room. Additionally, BEMP outlines that information should be provided to guests to encourage switching off of air conditioning devices where appropriate.

Proposed update:

In order to harmonize Criterion 7 and Criterion 8, which requires information asking guests to turn off the lights when leaving the room if there is no automatic off-switch for the light(s), a text is proposed to be included in the mandatory criterion of *staff training* (see section 2.1.6.3) and *information to guests* (see section 2.1.6.4)

Only the reference to automatic switching off for new appliances is addressed at the proposed criterion and the title is aligned with optional criteria which addresses the automatic switch off for all existing units.

Current proposal for revised criterion:

Criterion 6: Automatic switching of off heating or air conditioning systems

Individual heating/air conditioning systems acquired after the award of the EU Ecolabel shall be equipped with an automatic switch off when windows are opened.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation sale and/or maintenance of the air conditioning system.

2.1.1.8 Criterion 8: Switching off lights

Current criterion:

Switching off lights

If there is no automatic off-switch for the light(s) in the rooms, there shall be easily available information to the guests asking them to turn off the lights when leaving the room.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with the information procedures.

This criterion does not require updating (with the exception of grammar), and so it is proposed that no changes are made. This is based on the following:

1. Very little stakeholder feedback was received regarding this criterion; much of the feedback suggested that this was just common sense. However, the criterion will be maintained as lighting can be a significant user of energy within tourist accommodation.
2. BEMP is to “install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural-light and time.” The

EU Ecolabel criterion reflects this and specifies the actions which must be taken where this types of system is not installed.

The criterion is therefore proposed to remain as:

First proposal for revised criterion:

Switching off lights

If there is no automatic off-switch for the light(s) in the rooms, there shall be easily available information to the guests asking them to turn off the lights when leaving the room.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a copy of the information provided to guests.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG are noted in Annex III.

A licence holder suggested for new accommodations (CSS) or renovated rooms (TAS), to introduce mandatory centralized switch-off system. These systems are cheaper than automatic systems (generally a button or card that switch off all lights when leaving the room) and leads to a potential energy and economy saving. They mentioned that equivalent system for heating and air conditioning are more expensive. Thus, they did not suggest introducing same requirement for criterion 7.

Proposed update:

In order to harmonize Criterion 7 and Criterion 8, a text is proposed to be included in the mandatory criteria for *staff training* (see section 2.1.6.3) and *information to guests* (see section 2.1.6.4) concerning the switch off of lights/air conditioning when there are no automatic systems.

Only the reference to automatic switching off for new appliances is addressed at the proposed criterion and the title is aligned with optional criteria which addresses the automatic switch off for all existing units.

Additionally, we propose to consider centralized systems (button or card that switch off all lights when leaving the room) as automatic systems. This could be specified in the user manual.

Current proposal for revised criterion:

Criterion 7: Automatic switching off lights

Automatic systems, which turn the lights off when guests leave the room, shall be installed in new or renovated rental accommodations/guest rooms

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems.

2.1.1.9 Criterion 9: Energy efficient light bulbs

Current criterion:

Energy efficient light bulbs

(a) At least 80% of all light bulbs in the tourist accommodation shall have an energy efficiency of Class A as defined in Commission Directive 98/11/EC. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.

(b) 100% of light bulbs that are situated where they are likely to be turned on for more than five hours a day shall have an energy efficiency of Class A as defined by Directive 98/11/EC. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.

Assessment and verification: The applicant shall provide a declaration of compliance with both parts of this criterion, together with an indication of the energy efficiency class of the different light bulbs used.

Regulation:

Directive 98/11/EC was repealed with effect from 1 September 2013 by Commission Delegated Regulation (EU) No 874/2012 [OJ L 258, 12.7.2012, p.1]. Light bulb energy efficiency class shall therefore be defined as in Annex VI of this Regulation.

The existing criterion should be updated to reflect this.

Feedback:

37 comments were received with regards to Criterion 9: Energy efficient light bulbs. These comments reflect a mix of opinions from stakeholders, although this criterion is generally accepted as important to maintain. Major concerns were:

- The cost of replacing light bulbs, particularly for hotels with a large number of light bulbs.
- Timings related to changing a large number of light bulbs.
- Resource efficiency issues related to changing light bulbs before they reach end-of-life e.g. waste.
- Quality issues and compatibility with certain lamps/dimmable lights.
- Difficulties in assessing the criterion.
- Whether LED lights adhere to this criterion.

A number of respondents suggest that a phase-in period should be stated for this criterion so that existing light bulbs do not have to be disposed of until necessary.

BEMP:

The best environmental practice for lighting is: *“To install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural-light and time.”*

Much of the BEMP analysis relates less to the type of light bulb in use, and more to managing the lighting (e.g. through the use of motion or timed lighting). EU Ecolabel criteria for the management of lighting are in place, including: Criterion 8: Switching off lights, Criterion 47: Automatic switching off lights in rooms, and Criterion 50: Automatic switching off outside lights.

However, analysis of the BEMP suggests that the current criteria need updating to include a specific reference to LED lighting.

Proposed updates:

As a response to the BEMP and stakeholder feedback, it is proposed that a phase-in period is introduced to meet this criterion. This means that a tourist accommodation site does not need to dispose of old-style light bulbs unnecessarily (resulting in many cases in a large upfront cost as well as a waste of resources), but can replace these as and when required.

It is also important that the criterion maintains its recognition of the issues of compatibility with certain types of lighting system. This may include, for example, compatibility with dimmable lighting systems; currently energy efficient dimmable light bulbs can be significantly more expensive than other types of bulb and so there may be a significant cost impact to purchasing these for an entire hotel. The EU Ecolabel currently states that the criterion: *does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs*. It is suggested that this sentence is retained, but a clear definition of those 'physical characteristics' which may prevent the use of energy efficiency light bulbs should be set out in the assessment & verification section of the proposed revised criterion.

The reference to Directive 98/11/EC should also be changed.

The following revised criterion is therefore proposed:

First proposal for revised criterion:

Energy efficient light bulbs

The tourist accommodation shall develop and follow a documented plan to replace all light bulbs on site with energy efficient light bulbs including LED lighting, within a maximum of 2 years following application.

The documented plan shall, as a minimum achieve the following targets:

At the end of Year 1:

a) At least 40% of all light bulbs in the tourist accommodation shall have an energy efficiency of Class A as defined in Commission Delegated Regulation (EU) No 874/2012. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.

(b) At least 50% of light bulbs that are situated where they are likely to be turned on for more than five hours a day shall have an energy efficiency of Class A as defined by Commission Delegated Regulation (EU) No 874/2012. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.

At the end of Year 2:

a) At least 80% of all light bulbs in the tourist accommodation shall have an energy efficiency of Class A as defined in Commission Delegated Regulation (EU) No 874/2012. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.

(b) 100% of light bulbs that are situated where they are likely to be turned on for more than five hours a day shall have an energy efficiency of Class A as defined by Commission Delegated Regulation (EU) No 874/2012. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.

Assessment and verification: The applicant shall provide a declaration of compliance with both parts of this criterion, together with an indication of the energy efficiency class of the different light bulbs used. The documented plan shall also be provided.

The physical characteristics which may prevent the use of energy efficient light bulbs may include: decorative lighting requiring specialised light bulbs; dimmable lighting; situations where energy efficient lighting may not be available. Where this is the case, evidence should be provided to show why energy efficient light bulbs can't be used. This may include, for example, photographic evidence of the type of lighting installed.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG are noted in Annex III. A stakeholder mentioned that the proposal mixes a request for LED lamps and energy efficient lamps. They suggested only requesting energy efficient lamps and hence letting it th applicant choose which technology to use. They also suggested setting the level to minimum A+ (which *defacto* is asking for LED lamps).

They highlighted that if there is a criterion which sets some kind of documentation after two years it is important to specify when the two years starts, if it is from the adoption of criteria document or when the licence is given.

Another stakeholder claimed that it is very difficult for the Competent Body to control that at the end of both years.

Stakeholders also expressed concern related to the change of lamps before they reach their end of life.

The table below shows indicative example of different types of lamps for each energy class according to the Commission Delegated Regulation (EU) No 874/2012.

Figure 6. Energy efficiency classes for lamps and LED modules

Energy efficiency class	Non-directional lamps	Directional lamps
A++ (most efficient)	Class currently empty, apart from some low-pressure sodium lamps used in street lighting. Soon to include best LEDs (including modules)	Class currently empty, soon to include best LEDs (including modules)
A+	Best LED lamps and modules, best linear fluorescent, compact fluorescent and high intensity discharge (HID) lamps	Best LED lamps and modules
A	Average LEDs and modules, average compact fluorescent lamps and less efficient linear fluorescents and less efficient HIDs	Average LEDs and modules, average to good compact fluorescents and HIDs
B	Less efficient compact fluorescent lamps and LEDs, best halogen lamps (extra low voltage capsules)	Less efficient compact fluorescent lamps and LEDs, best halogen lamps (extra low voltage capsules)
C	Less efficient conventional extra low-voltage halogen lamps	Less efficient conventional extra low-voltage halogen lamps
D	Best (xenon-filled) mains-voltage halogen lamps Conventional halogen lamps and best incandescent	Best (xenon-filled) mains-voltage halogen lamps Conventional halogen lamps and best incandescent
E (least efficient)	Typical incandescent range	Incandescent lamps and less efficient mains-voltage halogen lamps

(*) 'Directional lamp' means a lamp having at least 80 % light output within a solid angle/ 'Non-directional lamp' means a lamp that is not a directional lamp

Source: [LightingEurope, 2013]

Proposed update:

Specific mention of LED lighting is omitted as LED lamps are included in the scope of the Commission Delegated Regulation (EU) No 874/2012. It is proposed to require at least class A, instead of a prescriptive class A, as this would allow higher efficient classes to be used. The criterion and the assessment and verification section have been reworded to improve

clarity. Any lamp types permitted after 2016, as defined in Commission Delegated Regulation (EU) No 874/2012, are allowed.

Current proposal for revised criterion:

Criterion 8: Energy efficient light bulbs

In maximum 1 year from the date of the EU Ecolabel licence award:

(a) At least 40% of all light bulbs in the tourist accommodation shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012.

(b) At least 50% of light bulbs that are situated where they are likely to be turned on for more than five hours a day shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012.

In maximum of 2 years from the date of the EU Ecolabel licence award:

(a) At least 80% of all light bulbs in the tourist accommodation shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012.

(b) The 100% of light bulbs that are situated where they are likely to be turned on for more than five hours a day shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012.

The targets above do not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.

Assessment and verification: The tourist accommodation shall provide to the competent body a two written reports indicating the total amount of lamps, operating hours and amount of energy saving lamps with at least energy efficient light bulbs of Class A as defined in Commission Delegated Regulation (EU) No 874/2012. The reports shall also include the explanation on the impossibility to substitute light bulbs where physical characteristics do not allow use of energy-saving light bulbs. First and second reports shall be provided within a maximum of 1 and 2 years respectively from the date of the award.

The physical characteristics which may prevent the use of energy efficient light bulbs may include: decorative lighting requiring specialised light bulbs; dimmable lighting; situations where energy efficient lighting may not be available. Where this is the case, evidence should be provided to show why energy efficient light bulbs can't be used. This may include, for example, photographic evidence of the type of lighting installed.

2.1.1.10 **Criterion 10: Outside heating appliances**

Current criterion:

Outside heating appliances

The tourist accommodation shall use only appliances powered with renewable energy sources to heat outside areas such as smoking corners or external dining areas.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, indicating the nature of the energy sources used in case of appliances powered with renewable energy sources.

Regulation:

Renewable energy sources are defined according to Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources. This Directive establishes a common framework for the production and promotion of energy from renewable sources, and can be used to provide a clear definition of 'renewable energy sources'. Reference to this Directive should be made in the criterion to ensure all applicants/licence holders and CBs are clear about what 'renewable energy sources' are.

Feedback:

17 comments were received, and opinions varied. A number of respondents believed outside heating appliances should be banned as these are viewed as being not sustainable. Other respondents argued that the same energy source is used for indoor and outdoor appliances and therefore a distinction cannot be made. However, the use of outdoor heating is also dependent on the climate of the tourist accommodation. Some respondents stated that in colder regions outdoor heating may be required to meet certain quality standards.

There was some debate over the definition of appliances powered by 'renewable energy sources'. A distinction can be made between those heating appliances which are 'stand-alone' (e.g. a solar powered heater) and those which use mains electricity. It is suggested that the existing criterion only allows the use of 'stand-alone' outside heating. However, a number of respondents were confused as to whether mains powered heaters were allowed if the tourist accommodation could show that a proportion of the mains electricity used comes from renewable energy sources (in line with Criterion 1: Electricity from renewable sources).

BEMP:

The use of outside heating appliances is **not** specifically identified as a hot spot for accommodation services. However, best practice does include the use of renewable energy sources, which includes *"To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier."*

Although there is no specific BEMP guidance on the use of outside heating appliances, the general guidance on the use of renewable energy sources is reflected in the current EU Ecolabel criteria.

Proposed updates:

Due to conflicting feedback from stakeholders, two options are proposed for this criterion.

Option 1:

This criterion is maintained and, following Best Environmental Management Practice (BEMP), restricts the use of outdoor heating to the use of stand-alone appliances powered by renewable energy. However, the criterion does need to more clearly define 'renewable energy' in this context, and should specifically state that this refers to on-site, stand-alone renewable energy generation devices. This will need to be clearly defined in the assessment and verification of the proposed revision to this criterion.

Therefore the criterion would be amended as follows (changes are underlined):

First proposal for revised criterion, Option 1:**Outside heating appliances**

The tourist accommodation shall use only stand-alone appliances powered with renewable energy sources to heat outside areas such as smoking corners or external dining areas.

Assessment and verification: The only outside heating appliances which may be used must be:

(1) Powered by renewable energy. (Renewable energy sources are defined according to Directive 2009/28/EC and include energy from renewable non-fossil sources, namely wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases); and

(2) 'Stand-alone' (i.e. do not plug into any mains power supply). This may include, for example, an outside appliance which uses biomass as fuel.

The applicant shall provide a declaration of compliance with this criterion, indicating the nature of the energy sources used in case of appliances powered with renewable energy sources

Option 2:

The use of any outside heating appliances is banned. The criterion would therefore be as follows:

First proposal for revised criterion, Option 2:

Outside heating appliances

No outside heating appliances shall be used by the tourist accommodation.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.

Relevant stakeholder comments and further research after AHWG1

Stakeholders were invited to choose either Option 1 (allow outside heating appliances which are powered by renewable energy) or Option 2 (ban all outside heating appliances). Most of the respondents that provided feedback favoured Option 2 (see stakeholder comments received during and after the first AHWG in Annex III). The arguments in favour of Option 2 included: a) outdoor heating appliances are a waste of energy, b) that alternatives are available e.g. blankets, and c) image incongruence - how to explain to guests that the use of outside heating appliances is sustainable?

Proposed update:

It is proposed that the criterion adopts option 2. It is proposed that the assessment and verification specifies that this criterion will be checked during the on-site visit.

Current proposal for revised criterion:

Criterion 9: Outside heating appliances

No outside heating appliances shall be used by the tourist accommodation.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion. This will be checked during the on-site visit.

2.1.2 Mandatory criteria related to water

2.1.2.1 Criterion 11: Water flow from taps and showers

Current criterion:**Water flow from taps and showers**

The average water flow of the taps and shower heads excluding bath tub taps, kitchen taps and filling stations shall not exceed 9 litres/minute.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, and relevant documentation, including an explanation on how the tourist accommodation fulfils the criterion.

Feedback:

Stakeholder feedback suggests that there is some confusion about how flow rates can be controlled – the User Manual could outline this in more detail, for example:

There are a number of ways to control the flow rates of taps and shower heads once they have been installed. These include: installation of water efficient taps or shower heads (for example, those which are EU Ecolabelled), fitting flow restrictors or controllers, installing aerators onto taps or partially closing or adjusting the valves which convey water to taps or showers. Please note, a tourist accommodation may need to contact a professional plumber (or equivalent) before implementing these water saving techniques.

It is also suggested that the flow rate of taps and showers could be tightened and should not exceed 8 litres per minute (rather than the current 9 litres per minute).

BEMP:

BEMP for water flow is “to minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs.” The EU Ecolabel criterion is currently in line with this.

Other updates:

The criterion should be updated to take into account new EU Ecolabel criteria for Taps and Showers (Commission Decision 2013/250/EU of 21 May 2013 EU Ecolabel for Sanitary Tapware). The Ecolabel criteria also specify assessment criteria for different types of taps. The corresponding User Manual could provide further details on how this criterion should be met, such as:

The EU Ecolabel for sanitary tapware (Commission Decision 2013/250/EU of 21 May 2013) refers to different types of taps. Table 1 and Table 3 (referred to in Criterion 11 for tourist accommodation) specify water flow rate limits for each type of tap. These should be referred to when providing documentation for your application. The EU Ecolabel for tapware can be found at: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013D0250>

Proposed update:

It is proposed that the criterion is updated to include reference to the new EU Ecolabel criteria for taps and showers (Commission Decision 2013/250/EU of 21 May 2013 EU Ecolabel for Sanitary Tapware). The following is proposed:

First proposal for revised criterion:

Water flow from taps and showers

The average water flow of the taps and shower heads, excluding kitchen and bath tub taps, shall comply with the maxima and minima set out in Tables 1 and 3 respectively of Commission Decision 2013/250/EU of 21 May 2013 establishing the ecological criteria for the award of the EU Ecolabel for sanitary tapware.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion and relevant documentation including an explanation on how the tourist accommodation fulfils the criterion. The applicant shall provide a declaration of compliance and relevant documentation explaining how the tourist accommodation fulfils this criterion. For pillar taps and divided spout outlet kitchen taps, the flow rate shall be the summation of the two flows, i.e. the total flow to basin or sink from the hot and cold water tapware. Showerheads and showers with more than one spray pattern shall fulfil the requirement for the setting with the highest water flow.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG – see Annex III – expressed some concern with shower head flow rates and suggested that the use of rain shower heads to improve the customer experience would require a relaxation of the limit for shower heads to 10/11 litres per minute. Several licence holders highlighted the impracticalities considering the proposed wording and that the values are very stringent especially if it are not considered in average form. They mentioned that the flow may change depending on the floor of the room. A licence holder mentioned that 8 litres/minute threshold could be reachable.

Proposed update:

Against this background it is proposed to keep the current criterion wording. However the limit has been decreased to 8 litres/minute in order to increase the ambition level compare to current requirement and reflecting best practices.

Current proposal for revised criterion:

Criterion 10: Water flow from taps and showers

The average water flow of the taps and shower heads excluding bath tub taps, kitchen taps and filling stations shall not exceed 8 litres/minute.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, and relevant documentation, including an explanation on how the tourist accommodation fulfils the criterion (e.g. use of flowmeter or small bucket and a watch)

2.1.2.2 **Criterion 12: Waste bins in toilets**

Current criterion:

Waste bins in toilets

Each toilet shall have an appropriate waste bin and the guest shall be invited to use the waste bin instead of the toilet for appropriate waste.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate documentation regarding the information to the guests.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received regarding this criterion.
2. BEMP does not provide specific guidance on the provision of waste bins in toilets, but rather outlines best practice for waste water management. This has not been updated and so this criterion does not need to be changed.

The criterion will remain as:

First proposal for revised criterion:

Waste bins in toilets

Each toilet shall have an appropriate waste bin and the guest shall be invited to use the waste bin instead of the toilet for appropriate waste.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate documentation regarding the information to the guests.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG – see Annex III – suggested differentiating between waste that is recyclable and non-recyclable, and improving information provided to guests to encourage the disposal of differentiated waste in the appropriate container.

BEMP suggested that wastewater management is a relevant environmental aspect related to the accommodation and best practices are also provided to better manage this. In order to ensure proper wastewater treatment and facilitate this as best as possible BEMP actions suggest:

- Waste sorting and waste water treatment where there is not access to centralized waste water treatment. In this later case, BEMP is to install an on-site waste water treatment system that treats waste water at least to secondary, and preferably to tertiary, level, and includes at least pretreatment to screen solids and settle particulate matter followed by efficient biological treatment (e.g. in a sequencing batch reactor) to remove a high proportion of COD, BOD, nitrogen and phosphorus from the final effluent. Sludge is treated and disposed of in an environmentally acceptable manner.

Proposed update:

In order to facilitate wastewater treatment as best as possible it is proposed to merge this criterion with criterion 15 *correct waste water disposal* which directly refers to wastewater disposal. Additionally it is proposed to include a requirement where there is no access to centralized wastewater treatment aligned to the benchmark proposed by BEMP. Furthermore, as requested by stakeholders “Appropriate waste” has been defined in the criteria in order to promote that waste that can be recycled to be placed in the appropriate container in the main room or as directed by the accommodation provider.

Second proposal for revised criterion:

Criterion 11: Wastewater management

Each toilet shall have a bin for appropriate waste and a general list of substances that shall not be disposed of with the waste water according to the Groundwater Directive 2006/118/EC shall be provided to guests and staff.

Where it is not possible to send waste water for centralised treatment, on-site waste water treatment shall include a pretreatment (sieve/bar-rack, equalisation and sedimentation) followed by biological treatment with > 95 % Biological Oxygen Demand removal, > 90 % nitrification, and (off-site) anaerobic digestion of excess sludge.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion and relevant documentation (e.g. copies of the substances lists communicated to guests and staff).

“Appropriate waste” is non-recyclable waste. If the waste can be recycled it should be placed in the appropriate container in the main room or as directed by the accommodation provider.

2.1.2.3 **Criterion 13: Urinal flushing**

Current criterion:

Urinal flushing

All urinals shall be fitted with either automatic (timed) or manual flushing systems so that there is no continuous flushing.

←Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the urinals installed.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received regarding this criterion.
2. BEMP advises the avoidance of continuous flushing of urinals – this corresponds with current EU Ecolabel criterion.

The criterion will remain as:

First proposal for revised criterion:

Urinal flushing

All urinals shall be fitted with either automatic (timed) or manual flushing systems so that there is no continuous flushing.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the urinals installed.

Relevant stakeholder comments and further research after AHWG1

A stakeholder comment was received that requested that the criterion only permits EU Ecolabelled urinals (see stakeholder comments received at and after the first AHWG in Annex III). Since there are currently no EU Ecolabelled urinals on the market, it is not proposed to change the revised criterion set out above. However with the aim to simplify the criteria text and that WCs are more frequently used than urinals, it is proposed to merge this criterion with current criterion 54 *WCs flushing*. Best practice for WC flushing is to “minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs”.

Current proposal for revised criterion:

Criterion 12: WC and Urinal flushing

At least 95% of WCs shall consume 6 litres per full flush or less and all urinals shall be fitted with either automatic (timed) or manual flushing systems so that there is no continuous flushing.

Assessment and Verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion together with appropriate supporting documentation. Where EU Ecolabel flushing toilets and urinals products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2013/641/EU

2.1.2.4 **Criterion 14: Changing towels and sheets**

Current criterion:

Changing towels and sheets

Guests shall be informed of the environmental policy of the tourist accommodation on their arrival. This information shall explain that sheets and towels in the rooms shall be changed on their request, or by default at the frequency established by the environmental policy of the tourist accommodation or requested by law and/or national regulations.

This applies only to tourist accommodations where the service includes the provision of towels and/or sheets.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation showing how the guest is informed and how the tourist accommodation respects guests' requests.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Stakeholder feedback was limited for this criterion, although there was a general consensus of the importance of retaining it.
2. A high turnaround of towels and sheets within a tourist accommodation site gives rise to a significant environmental impact. The BEMP is to “encourage guests to re-use towels and bin liners”. This should be supported by “prominent notices for guests advising on specific measures, including towel and bedclothes re-use”. The current criterion incorporates the BEMP and so no update is required.

The criterion will remain as:

First proposal for revised criterion:

Changing towels and sheets

Guests shall be informed of the environmental policy of the tourist accommodation on their arrival. This information shall explain that sheets and towels in the rooms shall be changed on their request, or by default at the frequency established by the environmental policy of the tourist accommodation or requested by law and/or national regulations.

This applies only to tourist accommodations where the service includes the provision of towels and/or sheets.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation showing how the guest is informed and how the tourist accommodation respects guests' requests.

Relevant stakeholder comments and further research after AHWG1

Following stakeholder comments received during and after the first AHWG – see Annex III – it is proposed that the criterion is modified to remove any ambiguity as to how ‘...on their request,’ could be interpreted by guests. A stakeholder mentioned that guests may simply assume that they need only to ask for new towels and sheets for these to be changed. It is therefore proposed that more information as to the environmental load that results from washing towels and sheets is provided to guests and that guests are informed that towels and sheets ‘will not be changed’ unless ‘specifically’ requested.

Proposed update:

It is therefore proposed that more information as to the environmental load that results from washing towels and sheets is provided to guests and that guests are informed that towels and sheets ‘will not be changed’ unless ‘specifically’ requested. The text related to guest/staff information the requirement has been added in mandatory criteria for *staff training* (see section 2.1.6.3) and *information to guests* (see section 2.1.6.4).

Current proposal for revised criterion:

Criterion 13: Changing towels and sheets

The accommodation shall not change sheets and towels unless specifically requested, or by default at the frequency established by a third party certification of the tourist accommodation or requested by law and/or national regulations.

This applies only to tourist accommodations where the service includes the provision of towels and/or sheets.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the frequency established the third party certification or by law and/or national regulations.

2.1.2.5 **Criterion 15: Correct waste water disposal**

Current criterion:

Correct waste water disposal

The tourist accommodation shall inform guests and staff on the correct use of the waste water discharge, in order to avoid the disposal of substances that might prevent waste water treatment in accordance with the municipal waste water plan and Community regulations. Where a waste water plan from the Municipality is not available, the tourist accommodation shall provide a general list of substances that shall not be disposed of with the waste water according to the Groundwater Directive 2006/118/EC of the European Parliament and of the Council.

←Assessment and verification: The applicant shall provide a declaration of compliance with this criterion and relevant documentation (if available, waste water plan and communication to guests and staff).

This criterion does not require updating, (with the exception of minor corrections to the use of English), and so it is proposed that no significant changes are made. This is based on the following:

1. Directive 2006/118/EC on the protection of groundwater against pollution and deterioration (GWD) is still in force.
2. No stakeholder feedback has been received.
3. The BEMP is still related directly to this criterion – it is important to ensure proper wastewater treatment and facilitate this as best as possible.

This criterion will therefore be included without revision:

First proposal for revised criterion:

Correct waste water disposal

The tourist accommodation shall inform guests and staff of the correct disposal of waste water, in order to avoid the disposal of substances that might prevent waste water treatment in accordance with the municipal waste water plan and/or Community regulations. Where a waste water plan from the Municipality is not available, the tourist accommodation shall provide a general list of substances that shall not be disposed of with the waste water according to the Groundwater Directive 2006/118/EC of the European Parliament and of the Council.

←Assessment and verification: The applicant shall provide a declaration of compliance with this criterion and relevant documentation (if available, waste water plan and copies of the communication to guests and staff).

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG – see Annex III – were divided as to whether this criterion should be removed.

Proposed update:

It is proposed that the criterion should remain, but be simplified by removing reference to a municipal waste water plan which, in many parts of Europe, is not available. Furthermore, the criterion should aim to educate guests and staff. However, with the aim being to simplify the criteria set, the requirement has been merged in mandatory criteria for *Waste bins in toilets*. The merged revised criterion has been renamed as *Waste water management*. (See section 2.1.2.2)

2.1.3 Mandatory criteria related to detergents and disinfectants

2.1.3.1 Criterion 16: Chemical toilet disposal point (CDP) (campsites only)

Current criterion:

Chemical toilet disposal point (CDP) (campsites only)

Where the campsite is connected to a septic tank, the waste from chemical toilets shall be separately or otherwise correctly collected and treated. Where the site is connected to the public sewage system, a special sink or disposal unit aimed at avoiding spillage shall be sufficient.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, and relevant documentation including any specific disposal requirement by the local authority together with information on the chemical sink.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Stakeholder feedback was limited. One stakeholder suggested that this could be expanded to include all other types of accommodation. However, this criterion mainly concerns campsites and so it is suggested this is not made applicable to all tourist accommodation.
2. BEMP refers directly to Criterion 16: Chemical toilet disposal point as an indicator for best environmental management of outdoor areas in campsites. No other update is provided and so this criterion does not need to be changed.

The criterion will remain as:

First proposal for revised criterion:

Chemical toilet disposal point (CDP) (campsites only)

Where the tourist accommodation is connected to a septic tank, the waste from chemical toilets shall be separately or otherwise correctly collected and treated. Where the site is connected to the public sewage system, a special sink or disposal unit aimed at avoiding spillage shall be sufficient.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, and relevant documentation including any specific disposal requirement by the local authority together with information on the chemical sink.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the first AHWG – see Annex III – proposed opening the criterion to all tourist accommodation services. It is proposed that this change is implemented and the criterion is revised.

Proposed update

It is proposed to retain the criterion. This criterion refers to detergents and disinfectants section and its main scope is to avoid contamination of soil and groundwater by the chemicals contained in the liquids used for the chemical toilets which harm aquatic life.

Current proposal for revised criterion:

Criterion 14: Chemical toilet disposal point

Where the tourist accommodation is connected to a septic tank, the waste from chemical toilets shall be separately or otherwise correctly collected and treated. Where the tourist accommodation is connected to the public sewage system, a special sink or disposal unit shall be used to avoid spillage.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, and relevant documentation including any specific disposal requirement by the local authority together with information on the chemical sink.

2.1.3.2 Criterion 17: Disinfectants

Current criterion:

Disinfectants

Disinfectants shall be used only where they are necessary in order to comply with legal hygiene requirements.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with an indication of where and when disinfectants are used.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Stakeholder feedback was limited. Only one comment was received for this criterion, which suggested that a limit should be set for the amount of disinfectant allowed. However, that it will be problematic to develop a limit which is applicable to the range of tourist accommodation types in scope. Therefore, a limit will not be included
2. Apart from guidance on dosing of products and the use of EU Ecolabel products (this is covered in Criterion 61: Indications on water hardness, and Criterion 64: Detergents of the EU Ecolabel), there is no specific BEMP prohibiting the use of disinfectants, unless for legal hygiene requirements

The criterion will remain as:

First proposal for revised criterion :

Disinfectants

Disinfectants shall be used only where they are necessary in order to comply with legal hygiene requirements.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with an indication of where and when disinfectants are used.

Relevant stakeholder comments and further research after AHWG1

No comments were received for this criterion during and after the first AHWG. With the aim to simplify criteria it is proposed to delete this requirement. We understood that is not common to use more disinfectants than those needed for hygiene. Additionally, this is difficult to verify.

2.1.4 Mandatory criteria related to waste

2.1.4.1 Criterion 18: Waste separation by guests

Current criterion:

Waste separation by guests

Guests shall be informed how and where they can separate waste according to the best local or national systems within the areas to which the tourist accommodation belongs. Adequate containers for waste separation shall be as easily reachable as general waste bins.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the information to guests and explaining where containers are located on the tourist accommodation

Feedback:

There was some conflicting feedback about this criterion. Some respondents outlined difficulties in providing enough containers, whereas others suggested the criterion was important and should be clearly communicated to guests. In general, it was suggested that it should be specified how many containers are 'adequate'.

BEMP:

For waste separation, BEMP is to “minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting water recycling services.”

This is in line with the current EU Ecolabel criterion but, as also outlined by stakeholder feedback, it is important to ensure waste separation facilities are convenient and readily available.

Proposed update:

It is important to clarify what is ‘adequate’ in terms of availability of waste separation bins. It is therefore proposed that waste separation containers are at least available on each floor or in each block, to ensure they are used by guests.

The following is therefore suggested:

First proposal for revised criterion:

Waste separation by guests

Guests shall be informed how and where they can separate waste according to the best local or national systems within the geographic area in which the tourist accommodation is situated. Adequate containers for waste separation shall be available in the rooms or within easy reach; as a minimum, containers should be available on each floor and/or in each block of the tourist accommodation.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the information to guests and explaining where containers are located in the tourist accommodation.

Relevant stakeholder comments and further research after AHWG1

Limited stakeholder feedback was received for this criterion during and after AHWG1 – see Annex III.

Proposed update

In response to stakeholder comments, it is proposed that the location of waste containers is clarified by replacing “*within easy reach*” with “*on each floor of the tourist accommodation*” for tourist accommodation services, and “*at a single central point on the site*” for campsites. This change would allow the criterion to apply to all tourist accommodation services, including campsites. It has been included the clause: “*Without prejudice of the local or national regulation or safety rules...*”. This was considered relevant as there might be countries where this is regulated or there are safety rules that do not permit to place containers at each floor depending on the size of corridors, etc..

The criterion has been merged with Criterion 19 *waste separation* as both criteria are addressing the same. (See section 2.1.4.2)

2.1.4.2 **Criterion 19: Waste separation**

Current criterion:

Waste separation

Waste shall be separated into the categories that can be handled separately by the local or national waste management facilities, with particular care regarding hazardous waste, which shall be separated, collected and disposed of as listed in Commission Decision 2000/532/EC and appropriate disposal shall be sought. This list includes toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and

electrical appliances as specified in Directive 2002/96/EC of the European Parliament and of the Council and Directive 2002/95/EC of the European Parliament and of the Council.

If the local administration does not offer separate waste collection and/or disposal, the tourist accommodation shall write to them expressing their willingness to separate waste, and expressing their concern about the lack of separate collection and/or disposal. If the local authority does not provide disposal of hazardous waste, the applicant shall, every year, provide a declaration from the local authority that there is no hazardous waste disposal system in place.

The request to local authorities to provide separate waste collection and/or disposal shall be made yearly.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with an indication of the different categories of waste accepted by the local authorities, and/or relevant contracts with private agencies. Where appropriate the applicant shall provide every year the corresponding declaration to the local authority.

Regulation:

There have been no changes in legislation except for Directive 2002/96/EC on WEEE which was repealed in February 2014 by Directive 2012/19/EU of the European Parliament and of the Council [OJ L 198, 24.7.2012, p.38].

Feedback:

Stakeholders suggested that in some regions there is no waste separation. This can mean that waste is separated by staff and then mixed during collection. However, the current criterion does allow for this with the clause “*If the local administration does not offer separate waste collection and/or disposal, the tourist accommodation shall write to them expressing their willingness to separate waste, and expressing their concern about the lack of separate collection and/or disposal.*” It is suggested that this should be further clarified in the assessment and verification section.

BEMP:

The BEMP is “*to minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting water recycling services*”. This is reflected in the current criterion and so no update is required. A proposed reordering of sections is suggested.

Proposed update:

The current criterion is appropriate to meet BEMP guidance. It would, however, be beneficial to clearly outline the following under Criterion 19 (Further explanation of this is outlined in Section 2.1.10.3, Criterion 74).

A further update is required to reference the latest Directive specifying types of waste.

First proposal for revised criterion:

Waste separation

Waste shall be separated into the categories that can be handled separately by the local or national waste management facilities, with particular care regarding hazardous waste, which shall be separated, collected and disposed of as listed in Commission Decision 2000/532/EC and appropriate disposal shall be sought. This list includes toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances as specified in Directive 2012/19/EU of the European Parliament and of the Council.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with an indication of the different categories of waste accepted by the local authorities, and/or relevant contracts with private agencies. Where appropriate the applicant shall provide every year the corresponding declaration to the local authority.

If the local authority does not provide disposal of hazardous waste, the applicant shall, every year, provide a declaration from the local authority that there is no hazardous waste disposal system in place.

Where no separate waste collection is available in the local area (or where separate waste collection is limited), the tourist accommodation should: specify details of the waste collection (i.e. what can be collected separately) and write a letter every year to the local administration expressing willingness to separate waste and concern that this service is not currently available. A copy of this letter and any responses should be provided. The tourist accommodation should also regularly check local authority information to identify any changes to waste collection services.

It should be noted that waste separation should include the separation and proper disposal of fats/oils.

Relevant stakeholder comments and further research after AHWG1

Comments received during and after AHWG1 and responses can be found in Annex III. Limited stakeholder feedback was received regarding this criterion. A stakeholder mentioned that in France the law forbid to have waste collecting point on each floor on hotels.

Proposed update:

In response to stakeholder comments, it is proposed to remove reference to Directive 2012/19/EU of the European Parliament and of the Council in the criterion, since national and local authorities implement the Directive in different ways, according to the specific waste policy for a particular region.

With the aim to simplify, the criterion has been merged with Criterion 18 *waste separation by guests* as both criteria are addressing the same.

Current proposal for revised criterion:

Criterion 15: Waste separation

a) Without prejudice of the local or national regulation or safety rules, adequate containers for waste separation by guest shall be available in the rooms or on each floor of the tourist accommodation. In the case of camp sites, a container should be available at least at a single central point on the site.

b) Waste shall be separated into the categories by the tourist accommodation as required by the local or national waste management facilities, with particular care regarding hazardous waste e.g. toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with an indication of the different categories of waste accepted by the local authorities, and/or relevant contracts with private agencies.

2.1.4.3 Criterion 20: Disposable products

Current criterion:**Disposable products**

Unless required by law, disposable toiletries (not refillable) such as shampoo and soap, and other products (not re-usable), such as shower caps, brushes, nail files, etc. shall not be used. Where such disposable products are requested by law the applicant shall offer guests both solutions and encourage them with appropriate communication to use the non- disposable products.

Disposable drinking systems (e.g. cups), plates and cutlery shall only be used if they made out of renewable raw materials and are biodegradable and compostable according to EN 13432.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation explaining how the criterion is fulfilled (including any legislation requiring use of disposable products), and consistent documentation regarding the refillable products and/or on the information conveyed to the guests, concerning the encouragement to use non-disposable products (if applicable).

Feedback:

46 comments were received about this criterion.

Opinions on the practicalities of achieving this criterion vary. Several respondents stated that a ban on these products can conflict with national quality and/or star ratings. Also, many of these non-re-usable products (such as nail files) cannot be used by more than one guest as this is unhygienic. However, several respondents suggested that this criterion should be tightened to limit even further the use of disposable items.

It was highlighted that many guests expect certain products to be made available for their use during their stay; in particular toiletries such as soaps and shampoos. Therefore, many respondents recognised the need to provide clear information to guests as to why these products were not available. Importantly many hotels have to provide toiletries to guests to maintain their quality and/or star ratings. A number of hotels mentioned the use of refillable soap dispensers as a way of meeting this EU Ecolabel criterion and quality criteria, although several comments specified that refillable soap dispensers are not always suitable or acceptable to customers.

Generally, the section of the criterion relating to disposable drinking systems was agreed. In some cases, a total ban on disposable cups etc. for drinking systems was suggested, although several respondents highlighted that disposable products are typically safest to use around the swimming pool area.

BEMP:

BEMP guidance highlights the importance of waste prevention, and uses the avoidance of single-use items as a way of achieving this: *“Prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps, shampoos) and by buying cleaning agents in concentrated and bulk form – and by careful management of procurement volumes.”*

This is in line with the current EU Ecolabel criterion which restricts the use of a number of non-re-usable items (e.g. shower caps) and non-refillable items (e.g. shampoo). The BEMP also promotes waste reduction through ‘*careful management of procurement volumes*’ which is not currently reflected in the criteria for TAS and CSS.

Proposed updates:

A distinction should be made between those items which are used by a single guest and those which can be used by more than one guest. The following types of products are included in these categories:

1. Disposable products such as combs, shower caps, toothpaste and soap etc.
2. Re-usable toiletries, such as shampoos in bottles which can be closed after use and used by a guest throughout their stay, soap from a refillable dispenser.
3. Single-use toiletries, such as sachets which are only used once then disposed of.

The criterion for disposable products should reflect the differences between these. The aim of this criterion is to reduce waste and this is mainly created through the provision of single-use products. The criterion should reflect this and restrict the provision of single-use items. It is clear, however, that many hotels do provide guests with toiletries and in some cases this aligns with quality criteria. To reflect the BEMP, any toiletries provided to guests should be refillable/re-usable (i.e. no single use) or provided in dispensers which allow refilling of the products.

It is also important that this criterion is reflected in the staff training criterion (see Section 2.1.6.3) to ensure that products are not disposed of (for example, by cleaners) that could otherwise be used by the same guest(s) throughout their stay.

The following is proposed (changes are underlined):

First proposal for revised criterion:

Disposable products

Single use products and toiletries such as shower caps, brushes, nail files, shampoos, soaps etc. shall not be available to guests in rooms, but may be available on request.

The following exceptions apply:

1. If there is a legal obligation to provide single use toiletries in the room.
2. Where it is a requirement of a quality rating scheme to provide single use toiletries i.e. to achieve or maintain a star rating.

Disposable drinking systems (cups and glasses), plates and cutlery shall only be used if they are made out of renewable raw materials and are biodegradable and compostable according to EN 13432.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation explaining how the criterion is fulfilled (including any legislation or quality ratings/certification that requires the use of single-use products), and documentation explaining to guests why disposable products are not provided and about the refillable products and systems supplied.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received for this criterion during and after the first AHWG – see Annex III – highlighted the following issues:

- whether the standard operations of private chains should be included in the term ‘*quality rating scheme*’;
- whether stakeholders agreed with the proposal that the criterion should specify that single-use products may be available to guests ‘*on request*’; and
- whether disposable towels are included in the definition of ‘*disposable products*’.
- A stakeholder mentioned that they use disposable drawsheets, but they recycled them.

The Tripadvisor Greenleaders scheme [Tripadvisor Greenleaders (2013)], an environmental program for tourist accommodation, awards points for each of the following requirements:

- At least 90% of the guestroom bathrooms have refillable dispensers for liquid toiletries (soap, shampoo, and conditioner).
- At least 90% reusable food service items (i.e. crockery, cutlery, and water jugs).

They provide the following rationale: *Refillable dispensers create less waste than disposable amenities, as they can be refilled when necessary rather than being replaced.*

Reusable food items are durable (e.g. ceramic) plates, cutlery, and other items that can be washed and reused for serving food. Disposable food service items made of plastics and polystyrene foam are often non-recyclable or are recycled at low rates, leading them to end up in landfills or be incinerated.

Proposed update

It is proposed that the criterion is partially aligned to the Tripadvisor Greenleaders scheme, including the requirement to ban disposable single-use service items and remove reference to renewable raw materials that are biodegradable and compostable. Furthermore, a requirement relating to single-use towels and disposable bedding has been included, as a tourist accommodation might use single-use towels and bedding items, such as mattresses protectors, and this is not a best practice, unless they recycled them. The exception when there is a legal obligation or it is a requirement of a quality rating scheme is kept and it is proposed that the Assessment and verification section of the criterion is revised to specify that the 'quality rating scheme' should be independent of the tourist accommodation operator. It was generally agreed that the criterion should specify that single-use products should be made available, but only 'on request' and together with information that explains to guests the environmental benefits of the tourist accommodation providing refillable/reusable products and systems. However this text has been included in the criterion of *information to guests*. Additionally, in response to stakeholder comments, it is proposed to specify at the user manual that 'on request' may allow guests to request those items prior to the check-in (e.g.: at the reservation).

Current proposal for revised criterion:

Criterion 16: Single-use products

- Single-use products such as shower caps, brushes, nail files, shampoos, soaps etc. shall not be available to guests in rooms.

Single-use items above mentioned may be available on request or could be provided if there is a legal obligation or it is the requirement of independent quality rating/certification scheme the tourism accommodation was a member of prior to the awarding of the EU Ecolabel licence.

- Single-use food service items (crockery, cutlery, and water jugs) shall not be available to guests in rooms and restaurant/bar service, unless the items are recycled by the service provider.
- Single-use towels and disposable bedding shall not be available to guests in rooms, unless the items are recycled by the service provider.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation explaining how the criterion is fulfilled (including any legislation or independent quality rating/certification scheme that requires the use of single-use products the tourism accommodation was a member of prior to the awarding of the EU Ecolabel licence), and documentation explaining to guests why disposable

2.1.4.4 **Criterion 21: Breakfast packaging**

Current criterion:

Breakfast packaging

Except where required by law, no single dose packages shall be used for breakfast or other food service, with the exception of dairy fat spreads (such as butter, margarine and soft cheese), chocolate and peanut butter spreads, and diet or diabetic jams and preserves.

Assessment and verification: The applicant shall provide a declaration of compliance with the criterion and a detailed explanation on how the accommodation fulfils it, together with a list of single dose products used and the legislation requiring this.

Feedback:

66 comments we received on the criterion regarding breakfast packaging.

A number of respondents highlighted difficulties in complying with this criterion - due to either hygiene, legislative requirements or availability of products in single packages. Many respondents highlighted the issue of food waste (from bulk supply) versus packaging waste (single use products). The number of guests/occupancy can dictate whether more waste is produced with bulk packaging or individual packaging; for example, if there are few people at breakfast a large amount of yoghurt may need to be disposed of as it will not be eaten within the required dates. This will also be highly dependent on the services offered by the tourist accommodation.

It was suggested that the definition of what is included as 'breakfast packaging' should be confirmed (e.g. for example, there was some confusion as to whether sugar was included within the scope of this criterion).

LCA revealed that concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total.

BEMP outlines the following:

"Prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps, shampoos) and by buying cleaning agents in concentrated and bulk form – and by careful management of procurement volumes."

As outlined in the BEMP guidance, the purpose of managing food packaging is to prevent waste generation. As a method of minimising waste, the BEMP suggests avoiding single use items alongside buying certain products in bulk. Management of procurement volumes is also highlighted as an approach. This is mirrored in the current EU Ecolabel criterion, which bans the use of all single dose food packages. The EU Ecolabel criterion does not, however, specifically mention the way in which procurement volumes should be managed to ensure waste minimisation.

Proposed updates:

Importantly, the title of this criterion should be changed to reflect the fact that all food packaging is within scope of this criterion, not just breakfast items.

Is it also suggested that the criterion is modified to reflect the trade-off between food waste and packaging waste because, in some cases, disposable packaging can protect food from spoiling and therefore from being wasted. Ideally, both types of waste need to be avoided and so the following is suggested:

1. For non-perishable or long life food products the EU Ecolabel criterion should restrict the use of all single-use items (e.g. condiments, seasoning, sugar, UHT milk).
2. For perishable foods (e.g. yoghurt) the tourist accommodation should manage their procurement practices to ensure waste is minimised overall – i.e. that neither large amounts of either food or packaging waste are produced. This may involve providing food in bulk, in individual packaging or switching between the two as required. Any corresponding User Guide for tourist accommodation should outline clearly how this might work in practice (i.e. how to optimise the food/packaging waste balance depending on the offer of the tourist accommodation). Importantly, the tourist accommodation should be able to clearly explain how they are effectively managing the procurement of food to minimise both food and packaging waste, and provide documentation to this effect.

The following is therefore proposed (changes are underlined):

First proposal for revised criterion:

Food packaging

Except where required by law, no single dose packages for non-perishable food stuffs shall be used for food services.

For all perishable food stuffs, the tourist accommodation shall manage the provision of food to guests to minimise both food and packaging waste. To achieve this, the tourist accommodation shall follow a documented procedure which specifies how the food waste/packaging waste balance is optimised, dependent on the offer of the tourist accommodation.

Exempt from this criterion are dairy fat spreads (such as butter, margarine and soft cheese), chocolate and peanut butter spreads, and diet or diabetic jams and preserves.

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

Assessment and verification: The applicant shall provide a declaration of compliance with the criterion and the documented procedure which outlines how both food and packaging waste are minimised. Any legislation requiring the use of single dose products shall also be provided.

Relevant stakeholder comments and further research after AHWG1

All comments received during and after AHWG1 and responses can be found in Annex. IV.

Several stakeholders welcomed the idea behind the criteria, which is to address the trade-off between food waste and packaging waste. However, a lot of concerns were raised relating to the difficulty of assessing and verifying the minimisation of waste. A LCA review revealed that concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total (see preliminary report, July 2014). BEMP is to reduce single dose packaging and carefully manage procurement volumes.

Proposed updates:

It is proposed to keep the proposed criteria above but modify the title to better reflect that the aim of the criterion is to manage the waste derived from food services. In order to reduce the complexity concerning assessment and verification, indicative examples of non-perishable or long life food products (e.g. condiments, seasoning, sugar, UHT milk) and perishable foods (e.g. yoghurt) could be included in the User Manual.

Current proposal for revised criterion:

Criterion 17: Food service waste management

Except where required by law, no single dose packages for non-perishable food stuffs shall be used for food services.

For all perishable food stuffs, the tourist accommodation shall manage the provision of food to guests to minimise both food and packaging waste. To achieve this, the tourist accommodation shall follow a documented procedure which specifies how the food waste/packaging waste balance is optimised, dependent on the offer of the tourist accommodation.

Exempt from this criterion are dairy fat spreads (such as butter, margarine and soft cheese), chocolate and peanut butter spreads, and diet or diabetic jams and preserves.

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

Assessment and verification: The applicant shall provide a declaration of compliance with the criterion and the documented procedure which outlines how both food and packaging waste are minimised. Any legislation requiring the use of single dose products shall also be provided.

2.1.5 Mandatory criteria related to other services

2.1.5.1 Criterion 22: No smoking in common areas

Current criterion:

No smoking in common areas

A no smoking section shall be available in all indoor common areas.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.

Feedback:

There were a number of comments on this criterion, most of which outlined that within Europe no smoking in common areas is a legal obligation; the criterion should therefore be removed. In line with EU no-smoking laws, it was also suggested that the criterion should specify a total ban throughout the tourist accommodation.

BEMP:

There is no BEMP for restricting smoking in tourist accommodation.

Proposed updates:

Due to conflicting feedback from stakeholders, three options will be proposed for this criterion.

Option 1:

This criterion could be removed as all EU countries have adopted measures to protect citizens against exposure to tobacco smoke following the Council Recommendation of 30 November 2009 on Smoke-Free Environments (2009/C 296/02).. In addition, this criterion is more of a health issue than an environmental issue and so may not be relevant within the EU Ecolabel criterion set.

Option 2:

The criterion could be maintained. Although all EU countries have adopted measures at this respect, the EU Ecolabel is increasingly used outside Europe. The criterion should ensure best practice is maintained by all applicants and should cover those who are not already legally obliged to provide no smoking areas. The following criterion would therefore be maintained:

First proposal for revised criterion, Option 2:

No smoking in common areas

A no smoking section shall be available in all indoor common areas.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.

Option 3:

This criterion could be tightened to a complete ban in all indoor common areas (this is typically the case in hotels across Europe as a result of no-smoking legislation).

First proposal for revised criterion, Option 3:

No smoking in common areas

No smoking shall be allowed in any indoor common areas.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.

Relevant stakeholder comments and further research after AHWG1

Stakeholders overwhelmingly agreed that the criterion be tightened in line with Option 3, which bans smoking in all indoor common areas – see Annex III for stakeholder comments during and after the first AHWG.

Proposed update

Current proposal for revised criterion:

Criterion 18: No smoking in common areas

No smoking shall be allowed in any indoor common areas.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.

2.1.5.2 **Criterion 23: Public transportation**

Current criterion:**Public transportation**

Information shall be made easily available to the guests and staff on how to use public transportation to and from the tourist accommodation through its main means of communication. Where no appropriate public transport exists, information on other environmentally preferable means of transport shall also be provided.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with copies of the information material available.

Feedback:

Stakeholder feedback highlights the difficulties in complying with this criterion where no public transport infrastructure exists. For example, in some areas a bus service may only be operated during certain seasons.

LCA guest transportation (from home to home), could include more effective actions to promote the most environmentally-sound forms of transport, as well as discourage the most polluting ones.

BEMP:

BEMP guidance highlights the importance of encouraging the use of public transport.

Proposed update:

It should be made clear that this criterion is only applicable to organisations where this infrastructure already exists – this is a mandatory criterion and not all tourist accommodation sites are in areas where public transportation is available. The second part of the criterion is proposed to be integrated as part of the information, instead of an alternative way where no public transport is available. This will still maintain the aim of the criterion – to encourage and facilitate the use of public transport and other environmental preferable means of transport.

The following is therefore suggested:

First proposal for revised criterion:**Public transportation**

Information shall be made easily available to the guests and staff on how to use public transportation to and from the tourist accommodation (where available), together with information about other environmentally preferable means of transport (car sharing, bicycles, etc.).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with copies of the information material available e.g. on website, brochures etc.

Relevant stakeholder comments and further research after AHWG1

All comments received during and after AHWG1 and responses can be found in Annex III. Several stakeholders agreed that the criterion should request information is provided on the different means of home to home transportation.

BEMP guidance highlights the importance of encouraging the use of public transport. Furthermore, a LCA review carried out at the preliminary report stage revealed that guest transportation (from home to home), could include more effective actions to promote the

most environmentally-sound forms of transport, as well as discourage the most polluting ones.

Proposed update

The criterion title has been reworded and the text of the criterion changed in order to include several preferable means of transportation, including public transportation. Additionally, it is proposed to request the provision of information on preferable means of transport from home to home which has been pointed out as an environmental hot spot by the LCA review.

Current proposal for revised criterion:

Criterion 19: Environmentally preferable means of transport

Information shall be made available on the website of the accommodation and on-site to the guests and staff on:

- Environmentally preferable means of transport available to and from the tourist accommodation: public transportation, car sharing, bicycles, etc.

- Environmentally preferable means of transport available from home to home: train, car sharing, etc.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with copies of the information material available e.g. on websites, brochures etc.

2.1.5.3 **Proposed new criterion: Local food products**

The following, mandatory criterion is proposed for local food products:

Proposal for new criterion:

Local food products (mandatory)

Consumption of endangered species such as specific fish and crustacean species and 'bushmeat' and shrimps from mangrove forest endangering cultivation shall be forbidden.

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

This criterion is not new, but has been extracted from Criterion 90: Local food products, which is an optional criterion.

BEMP

The BEMP for kitchens in tourist accommodation is to "assess food and drink supply chains to identify environmental hotspots and key control points, including choice editing of menus to avoid particularly damaging ingredients (e.g. some out-of-season fruit), and selection of environmentally-certified products".

Proposed update:

It is proposed that this section of the criterion is made mandatory to bring this criterion into line with other environmental and sustainability labels for tourism, stakeholder feedback and BEMP (more detail about other labels and stakeholder feedback which informed this update can be found in section 4.5.1 of the Preliminary Report.)

Relevant stakeholder comments and further research after AHWG1

Limited stakeholder comments were received. (See stakeholder feedback received during and after the first AHWG in Annex III).

We understood that the ‘endangered species’ trade is regulated by COUNCIL REGULATION (EC) No 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein. Additionally there are local and national legal requirements on the consumption of certain species.

Proposed update

It is therefore proposed that this criterion is not finally proposed as there are already legal requirements and it is very difficult to use the EU Ecolabel to set additional requirements regarding the differences of endangered species along different countries.

2.1.5.4 Proposed new criterion: Fundamental principles and rights at work

The following new, mandatory criterion is proposed to consider rights at work:

Proposal for new criterion:

Fundamental principles and rights at work (mandatory)

Applicants shall ensure that the fundamental principles and rights at work as described in the International Labour Organisation’s (ILO) Core Labour Standards, the UN Global Compact and the OECD Guidelines for Multi-National Enterprises shall be observed at all tourist accommodation sites. For the purpose of verification, the following ILO Core Labour Standards shall be referred to:

- 029 Forced Labour
- 087 Freedom of Association and Protection of the Right to Organise
- 098 Right to Organise and Collective Bargaining
- 100 Equal remuneration
- 105 Abolition of Forced Labour
- 111 Discrimination (Employment and Occupation)
- 138 Minimum Age Convention
- 182 Elimination of the Worst Forms of Child Labour

Assessment and verification: the applicant shall demonstrate compliance, using independent verification or documentary evidence and this will be checked as part of the on-site inspection.

The rationale for this has been outline in Section 4.5.1 of the Preliminary Report, and includes:

- Stakeholder feedback suggests that social considerations should be further included in the revised EU Ecolabel criteria for tourist accommodation – specifically, labour and employment criterion should be added.
- Other eco-labels include mandatory criterion which focus on the labour and employment aspects of tourist accommodation. Including this in the EU Ecolabel will bring this criterion into line with alternative eco-labels.

Relevant stakeholder comments and further research after AHWG1

Stakeholders overwhelmingly supported the inclusion of this criterion. A number of stakeholders proposed that the criterion be optional and focus on social actions – see Annex III for stakeholder comments received during and after the first AHWG. Clarification was requested by stakeholders as to whether it was the role of the Competent Body to check compliance with the criterion.

A Competent Body claimed that social national legislation is, in certain cases, not even respected in European countries. A stakeholder disagreed with the existing criterion proposal based on the fact that it is in line with the criteria for other ecolabel products (e.g. textiles) and feels that the same level of requirements should not be required for a factory and a tourist accommodation service.

Stakeholders suggested examples of potential social actions to be included as optional criteria:

- *The hotel can give a bonus to a person which reduces the waste of the breakfast buffet.*
- *Help of the manager to fill the file of loan for the bank with the aim of a real estate purchase for the employees.*
- *Implementation of a shuttle in late hours for the travel of staff.*

Other environmental schemes for Tourism were consulted. Criteria focusing on employment of staff within the tourist accommodation for other schemes are the following:

- **Restricting child labour and commercial exploitation, including sexual exploitation**

1. The organization has implemented a policy against commercial, sexual or any other form of exploitation and harassment, particularly of children, adolescents, women and minorities. Global Sustainable Tourism Council Criteria [GSTC, 2013]

The scheme indicates the following performance indicators and guidance designed to provide guidance in measuring compliance with the criteria.

Indicator: Documented policy is made known to all staff and management. In developing the code, the organization has consulted and sought consent of the local community.

Guidance: Small organizations with few staff may have a simple policy provided it is implemented; larger organizations must have documented policy and associated staff awareness and reporting systems. The signing of the code of conduct from UNWTO, UNICEF, ECPAT, etc. is evidence of implementation of policies (see www.thecode.org).

2. The business has implemented a policy against commercial exploitation, particularly of children and adolescents, including sexual exploitation. [Green globe Certification]

- **Ensuring equal employment opportunities**

1. The organization offers equal employment opportunities to women, local minorities and others, including in management positions, while restraining child labour. [GSTC, 2013]

Indicators: Percentage of women and local minority employees on the staff is reflective of local demographics (both in management and non-management categories). Internal promotion of women and local minorities occurs. There is no child labour (as defined by the ILO).

Guidance: In local economies with little tourism employment and/or for businesses with high degrees of training and experience requirements of staff the employment of local minorities may be reduced, however in this case some employment and training, commensurate with the size of the organization is expected. "The term 'child labour' is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work." <http://www.ilo.org/ipecc/facts/lang--en/index.htm>

- **Ensuring fair employment practices**

1. The international or national legal protection of employees is respected, and employees are paid at least a living wage. [GSTC, 2013]

Indicators:

- Salaries and benefits meet or exceed local, national and international regulations, (whichever are higher).
- Payment is made into a national social security system (if available) for qualified employees.
- Overtime is paid for hours worked beyond the established work week hours and working hours must not exceed the legal maximums or those established by the International Labour Organization.
- All employees have the right to annual paid vacation.
- Health insurance or the equivalent is provided to all employees.

Guidance: Salaries and benefits for local employees should compensate to any extraordinary travel costs (e.g. out of hours travel when public transport is not available).

2. Do working hours comply with national or international law or benchmark industry standards, whichever affords employees most protection? [Travelife]

3. Are employees free to: enter their employment through their own choice / leave their employment when they choose without penalty? [Travelife]

For the verification of these criteria, qualified auditors of the corresponding schemes will visit the business premises to interview staff, inspect documentation and observe routine operations and installations in order to establish compliance with the criteria.

Proposed update

Although it is important to harmonise different EU Ecolabel product criteria, it is important to recognise the specific differences in the products/services. Therefore it is proposed to include the employment requirements addressed in other environmental schemes for tourism which cover minimum national legislation and further.

It is proposed that the assessment and verification procedure requests that the applicant provides a report from an independent auditor or documentary evidence. In order to recognise the high investment of third party certification, documentary evidence to demonstrate compliance, it is proposed to be accepted as a mean of verification. Verification may include staff interviews, inspections and observations of routine operations and installations. Emails and phone interviews could be an alternative where on site visits are not possible. It is proposed to include the indicators and guidance for compliancy in the user manual to facilitate verification.

Current proposal for new criterion:

Criterion 20: Fundamental principles and rights at work

Applicants shall ensure as a minimum the following fundamental principles and rights at work for their employees:

- The accommodation has implemented a policy against commercial, sexual or any other form of exploitation and harassment, particularly of children, adolescents, women and minorities.

- [The accommodation offers equal employment opportunities to women, local minorities and others, including in management positions, while restraining child labour.](#)
- [The international or national legal protection of employees is respected, and employees are paid at least a living wage.](#)
- [Employees' working hours comply with national or international law or benchmark industry standards, whichever affords employees most protection.](#)
- [Employees are free to enter their employment through their own choice / leave their employment when they choose without penalty.](#)

Assessment and verification: The applicant shall demonstrate compliance, using independent verification or documentary evidence (e.g. copies of contracts, salaries slips, national social security system registration numbers of employees, etc.). This will be checked during the on-site visit. Verification shall include interviews to staff (phone and/or onsite)

2.1.6 Mandatory criteria related to general management

2.1.6.1 Criterion 24: Maintenance and servicing of boilers and air conditioning systems

Current criterion:

Maintenance and servicing of boilers and air conditioning systems

Maintenance and servicing of boilers and air conditioning systems shall be carried out at least yearly, or more often if so required by law or need, by appropriately qualified professionals, following CEI and national standards where these apply, or according to the manufacturer's instructions.

For air conditioning systems the maintenance (check for leakage and repair) has to be carried out according to Regulation (EC) No 842/2006 of the European Parliament and of the Council, in line with the amount of F (fluorinated green-house) gas contained in the application, as follows:

- at least once every 12 months for applications containing 3 kg or more of F gases (this shall not apply to equipment with hermetically sealed systems, which are labelled as such and contain less than 6 kg of fluorinated greenhouse gases),
- at least once every six months for applications containing 30 kg or more of F gases,
- at least once every three months for applications containing 300 kg or more of F gases.

Assessment and verification: The applicant shall provide a declaration of compliance with all parts of this criterion, together with a description of the boilers and their maintenance programme, and details of the persons/companies carrying out the maintenance, and what is checked during the maintenance.

For air conditioning systems containing 3 kg or more of F gases the applicant shall provide records on the quantity and type of F gases installed, any quantities added and the quantity recovered during maintenance, servicing and final disposal as well as the identification of the company or technician who performed the servicing or maintenance, as well as the dates and results of the leakage checks and relevant information specifically identifying the separate stationary equipment with more than 30 kg of F gases.

Regulation:

Regulation (EC) No 842/2006 [OJ L 161, 14.6.2006, p.1] is currently in force. In March 2014, the European Parliament adopted a revised text for the F-gas regulation. Formal approval by

the Council is expected in April and the new Regulation is expected to come into force in May 2014. This new regulation should repeal Regulation (EC) No 842/2006 in January 2015 [DG Climate Action (2014)].

Feedback:

There was no feedback to suggest that this criterion should be removed or updated, just that further guidance on how to collect this information may be helpful. Again, this could be considered in any User Manual for tourist accommodation:

Information on maintenance of the boiler/air conditioning unit in your tourist accommodation can typically be found in the product manual – often, this will also be available on the manufacturers’ website. Where any maintenance on the boiler/air conditioning unit is carried out, this should be recorded along with information such as: the date when maintenance is carried out, any repairs etc. required, and a signature of the professional who carried out the maintenance. This will typically be recorded in a log book which could be kept with relevant invoices etc.

BEMP:

BEMP is to “ensure that all equipment is maintained through appropriate periodic inspection”. This still reflects the previous criterion for TAS and CSS, and as such is still applicable..

Proposed update according to new legislation:

First proposal for revised criterion:
Maintenance and servicing of boilers and air conditioning systems
Maintenance and servicing of boilers and air conditioning systems shall be carried out at least yearly, or more often if so required by law or need, by appropriately qualified professionals, following CEI and national standards where these apply, or according to the manufacturer’s instructions.
For air conditioning systems <u>and heat pumps</u> , the maintenance (check for leakage and repair) has to be carried out according <u>Regulation (EU) No 517/2014 of the European Parliament and of the Council of 16 April 2014 on fluorinated greenhouse gases and repealing Regulation (EC) No 842/2006.</u>
<i>Assessment and verification: The applicant shall provide a declaration of compliance with all parts of this criterion, together with a description of the <u>appliances</u> and their maintenance programme, and details of the persons/companies carrying out the maintenance, <u>together with the certification according Article 10 of Regulation EU No 517/2014, and what is checked during the maintenance.</u></i>

Relevant stakeholder comments and further research after AHWG1

All comments received during and after AHWG1 and responses can be found in Annex III. Limited stakeholder feedback was received regarding this criterion. A stakeholder suggested including the maintenance of devices, which include frigorigen gas (like refrigerated storage areas) in the criterion.

Proposed update

The scope of the criterion has been modified to include refrigeration systems. Regulation No 517/2014 applies to commercial refrigeration systems, as well as to boilers and air conditioning systems. Although it is mandatory across the EU, we need to recognise that tourist accommodation outside the EU may also apply.

Current proposal for revised criterion:

Criterion 21: Maintenance and servicing of boilers, air conditioning systems and refrigeration systems

Maintenance and servicing of boilers, air conditioning systems and refrigeration systems shall be carried out at least yearly, or more often if required by law or need, by appropriately qualified professionals, following CEI and national standards where these apply, or according to the manufacturer's instructions.

For air conditioning systems, refrigeration systems and heat pumps, the maintenance (check for leakage and repair) has to be carried out according Regulation (EU) No 517/2014 of the European Parliament and of the Council of 16 April 2014 on fluorinated greenhouse gases and repealing Regulation (EC) No 842/2006.

Assessment and verification: The applicant shall provide a declaration of compliance with all parts of this criterion, together with a description of the appliances and their maintenance programme, and details of the persons/companies carrying out the maintenance.

2.1.6.2 **Criterion 25: Policy setting and environmental programme**

Current criterion:

Policy setting and environmental programme

The management shall have an environmental policy and shall draw up a simple environmental policy statement and a precise action programme to ensure the application of the environmental policy.

The action programme shall identify targets on environmental performance regarding energy, water, chemicals and waste, which shall be set every two years, taking into consideration the optional criteria and the data collected where available. It shall identify the person who will act as the environmental manager of the tourist accommodation and who is in charge of taking the necessary actions and reaching the targets. The environmental policy shall be available for consultation by the public.

Comments and feedback from guests collected by means of a questionnaire or check list shall be taken into account.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a copy of the environmental policy or the policy statement and action programme, and procedures for taking into account input from guests.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Stakeholder feedback relating to this criterion did not suggest any updates. However, it was suggested that social aspects could be introduced to this if applicable. However, a new criterion (Fundamental principles and rights at work, Section 0) has been developed to account for this, and so no updates to this criterion are suggested. There was also one comment which suggested that a two year update is not achievable – this was not a widely held opinion and so the criterion has not been changed to reflect this.
2. BEMP still coincides with the current criterion. BEMP is to establish an environmental policy, set target and monitor adherence to these.

The criterion shall remain as:

First proposal for revised criterion:**Policy setting and environmental programme**

The management shall have an environmental policy and shall draw up a simple environmental policy statement and a precise action programme to ensure the application of the environmental policy.

The action programme shall identify targets on environmental performance regarding energy, water, chemicals and waste, which shall be set every two years, taking into consideration the optional criteria and the data collected where available. It shall identify the person who will act as the environmental manager of the tourist accommodation and who is in charge of taking the necessary actions and reaching the targets. The environmental policy shall be available for consultation by the public.

Comments and feedback from guests collected by means of a questionnaire or check list shall be taken into account.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a copy of the environmental policy or the policy statement and action programme, and procedures for taking into account input from guests.

Relevant stakeholder comments and further research after AHWG1

In response to stakeholder comments during and after the first AHWG (see Annex III) it is proposed that setting targets for a social criterion is not necessary as the proposed social mandatory criterion includes a policy against exploitation and harassment.

Additionally with the aim to simplify the criteria set and that there is optional criterion on ISO14001 and EMAS CERTIFICATION it is proposed to delete this mandatory criterion and promote third party certification adding extra points at optional criteria.

2.1.6.3 Criterion 26: Staff training**Current criterion:****Staff training**

The tourist accommodation shall provide information and training to the staff, including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour. In particular, the following issues shall be taken into consideration:

Concerning energy saving:

— Staff shall be trained on how to save energy.

Concerning water saving:

— Staff shall be trained to check every day for visible leaks and to take appropriate action as necessary.

— Flowers and outside areas shall normally be watered before high sun or after sunset, where regional or climatic conditions make it appropriate.

— Staff shall be informed of the tourist accommodation's policy regarding Criterion 14 about towel change and be instructed how to comply with it.

Concerning chemical substances:

— Staff shall be trained not to exceed the recommended amount of detergent and disinfectant indicated on the packaging.

Concerning waste:

— Staff shall be trained to collect, separate and bring to appropriate disposal waste into the categories that can be handled separately by the local or national waste management facilities as defined by Criterion 19.

— Staff shall be trained to collect, separate and bring to appropriate disposal hazardous waste as listed in Decision 2000/532/EC and defined by Criterion 19.

Adequate training shall be provided to all new staff within four weeks of starting employment and for all staff at least once a year.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and an indication of which staff have received what training and when. The applicant shall provide also copies of procedures and staff communication concerning all mentioned issues.

Feedback:

The feedback on this criterion suggested that staff training was an important consideration, and the existing requirements could be further clarified. It was suggested that training could specifically mention the EU Ecolabel and specify what this means for staff, and that timings for training should be specified (for example there could be an annual meeting to brief staff on environmental issues).

BEMP:

BEMP recommends that sustainability issues are included in basic training for all levels of staff, to highlight the importance of ensure waste reduction and water, and energy minimisation.

The key principles for effective staff training are outlined as follows:

- Clarify definitions to ensure that objectives and actions are understood by everyone.
- Include practical experience at all levels of training, and include study visits to demonstrate best practice in action where possible.
- Motivate staff with competitive objectives, including those for the organisation, to become environmental front-runners.
- Ensure that responsibilities are clearly defined.
- Encourage staff feedback and suggestions for environmental management.
- Analyse and evaluate reasons why best practices are not applied and improve training through review-loops to improve performance (including staff feedback).

It is important to recognise that due to the scope of the EU Ecolabel (i.e. ranging from small bed and breakfast sites to large hotels) this level of training may not be possible. However, the current EU Ecolabel criterion does reflect the key principles outlines above.

Proposed updates:

The current criterion does not require a major update but, as a result of stakeholder feedback and BEMP, it is suggested that a section is added about ensuring staff awareness of the EU Ecolabel. This has a number of purposes: (1) staff will have a greater understanding of the importance of the environmental actions taken by the tourist accommodation; and (2) staff will be able to respond to any guest queries about the EU Ecolabel.

It is also suggested that the criterion specifies that existing staff are provided with an update of environmental action (rather than repeating the same training routine) at least once a year.

This criterion has also been updated as a response to the updates proposed for Criterion 20: Disposable products (see section 2.1.4.3):

First proposal for revised criterion:

Staff training

The tourist accommodation shall provide information and training to the staff, including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour. In particular, the following issues shall be taken into consideration:

Concerning the EU Ecolabel for tourist accommodation:

Concerning energy saving:

- Staff shall be trained on how to save energy

Concerning water saving:

- Staff shall be trained to check every day for visible leaks and to take appropriate action as necessary.
- Flowers and outside areas shall normally be watered before high sun or after sunset, where regional or climatic conditions make it appropriate.
- Staff shall be informed of the tourist accommodation's policy regarding Criterion 14 about towel change and be instructed how to comply with it.

Concerning chemical substances:

- Staff shall be trained not to exceed the recommended amount of detergent and disinfectant indicated on the packaging.

Concerning waste:

- Staff shall be trained to collect, separate and bring to appropriate disposal waste into the categories that can be handled separately by the local or national waste management facilities as defined by Criterion 19.
- Staff shall be trained to collect, separate and bring to appropriate disposal hazardous waste as listed in Decision 2000/532/EC and defined by Criterion 19
-

Concerning disposable products:

Unless required by law or to achieve or maintain a quality certification/rating housekeeping staff shall:

- Not replace toiletries provided by the tourist accommodation (such as shampoo, soaps etc.) until these are fully used, or at the end of each guest's stay.
- Not replace other disposable products (such as combs or shower caps) until the end of each guest's stay.

Adequate training shall be provided to all new staff within four weeks of starting employment and an update on the above points for all other staff at least once a year.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and an indication of which staff have received what training and when. The date and types of the staff training should be recorded as evidence that this training update has taken place.

At least once a year, staff should be given an update on all the aspects outlined in the criterion. Although this update does not have to be a repeat of the initial training session

given to all staff, it should cover all of the environmental issues listed and ensure that staff are fully aware of their responsibilities.

The applicant shall provide also copies of procedures and staff communication concerning all mentioned issues.

Relevant stakeholder comments and further research after AHWG1

Several stakeholders commented on the difficulty of completing training for staff that work just a few hours a week or are supplied by an external subcontractor (see stakeholder comments received during and after the first AHWG in Annex III). However, it is suggested that the proposed criterion allows staff training to be carried out in varying degrees of detail as appropriate and encourages the use of manuals and documented procedures for part-time staff. The criterion has been updated to cover changes in other criteria of energy, water and waste.

Current proposal for revised criterion:

Criterion 22: Staff training

The tourist accommodation shall provide information and training to the staff, including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour. In particular, the following issues shall be taken into consideration:

Concerning the EU Ecolabel for tourist accommodation:

- Staff shall be made aware of what the EU Ecolabel is, what this means for the operations of the tourist accommodation, and how to communicate it to guests.

Concerning energy saving: Staff shall be trained on how to save energy:

- They shall be informed that lights, air conditioning and heating systems shall be switched off when leaving the rooms.
- They shall be informed that air conditioning and heating systems shall be switched off when windows are opened.

Concerning water saving:

- Staff shall be trained to check every day for visible leaks and to take appropriate action as necessary.
- Flowers and outside areas shall normally be watered before high sun or after sunset, where regional or climatic conditions make it appropriate.
- Staff shall be informed that washing sheets and towels gives rise to a significant environmental burden due to use of energy, water and detergents, and that sheets and towels will not be changed unless specifically requested, or by default at the frequency established by the third party environmental certification of the tourist accommodation or requested by law and/or national regulations.
- All relevant staff shall also be trained in following the backwashing procedure to ensure water use during swimming pool backwashing is minimised.

Concerning chemical substances:

- Staff shall be trained not to exceed the recommended amount of detergent and disinfectant indicated on the packaging.

Concerning waste:

- Staff shall be trained to collect, separate and bring to appropriate disposal waste into the categories that can be handled separately by the local or national waste management facilities as defined by Criterion 15.
- Staff shall be trained to collect, separate and bring to appropriate disposal hazardous waste as listed in Decision 2000/532/EC and defined by Criterion 15

Concerning single-use products:

Unless required by law or to achieve or maintain a quality certification/rating housekeeping staff shall:

- Not replace toiletries provided by the tourist accommodation (such as shampoo, soaps etc.) until these are fully used, or at the end of each guest's stay.
- Not replace other disposable products (such as combs or shower caps) until the end of each guest's stay.

Adequate training shall be provided to all new staff within four weeks of starting employment and an update on the above points for all other staff at least once a year.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and an indication of which staff have received what training and when. The date and types of the staff training should be recorded as evidence that this training update has taken place.

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

The applicant shall provide also copies of procedures and staff communication concerning all mentioned issues.

2.1.6.4 **Criterion 27: Information to guests**

Current criterion:

Information to guests

The tourist accommodation shall provide information to the guests, including conference participants, on its environmental policy, including safety and fire safety aspects, inviting them to contribute to its implementation. The information conveyed to the guests shall refer to the actions taken on behalf of its environmental policy and provide information about the Community eco-label. This information shall be actively given to the guests at the reception, together with a questionnaire covering their views about the environmental aspects of the tourist accommodation. Notices inviting guests to support the environmental objectives shall be visible to the guests, especially in the common areas and the rental accommodation.

Specific actions for the different areas shall be:

Concerning **energy**:

— Where applicable, according to criteria 7 and 8, inform guests on switching off heating/air conditioning and lights

Concerning **water and waste water**:

- In the sanitary areas and bathrooms there shall be adequate information to the guest on how to help the tourist accommodation to save water.
- The guest shall be invited to inform the staff of any leak.
- In the toilets, signs shall request guests to dispose of their waste into the waste bins instead of the toilets.
- Guests shall be informed about the necessities and obligations of correct disposal of the waste water from their mobile means of lodging.

Concerning **waste**:

- The guest shall be informed about the waste reduction policy of the tourist accommodation and the use of quality product alternatives to disposable and single portion products, and should be encouraged to use non-disposable products, in case where any legislation requires the use of disposable products.
- They shall be informed how and where they can separate waste according to local or national systems within the areas belonging to the tourist accommodation and where to dispose of their hazardous substances

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

Feedback:

9 comments were received with regard to Criterion 27 on information to guests and collection of feedback. In general, respondents believe that collecting feedback can be difficult; many guests, for example, may not wish to spend time providing information during their holiday period. Respondents suggested that, where information is collected, the accommodation should be able to show how this feedback is evaluated.

A number of tourist accommodation sites also suggested that example information provided as part of the EU Ecolabel would be helpful to better understand the type of information that should be collected. It was also suggested that the criteria be updated to better reflect technology improvement and new ways of communicating with guests.

BEMP:

BEMP suggests that guests should be provided with “interactive on-site education of environmental issues, including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles)”.

This criterion primarily focuses on providing information about the environmental objectives of the tourist accommodation, although other criteria are also in place which relate to this BEMP, including: Criterion 7: Switching off heating or air conditioning and Criterion 8: Switching off lights.

Combined, these meet best environmental practice.

Proposed updates:

Many tourist accommodation websites now provide links which allow guests to provide feedback. It is also not uncommon for tourist accommodation sites to email guests with details of bookings etc. These methods of communication can be used to obtain feedback – any corresponding User Manual should outline this:

All information to guest must be easily accessible.

The guest questionnaire(s) may be in electronic format (i.e. online), but the guest must be actively directed to this (i.e. via email or information points in the tourist

accommodation). If guests are encouraged to complete an online questionnaire, this should ask – as a minimum- (1) their views on these environmental aspects of the tourist accommodation and (2) general customer satisfaction with the facilities and services of the tourist accommodation.

As outlined in the criterion: Notices inviting guests to support the environmental objectives and encouraging feedback on all aspects of the tourist accommodation shall be visible to the guests, especially in the common areas and the rooms.

Other information should be actively given to guests using the most appropriate method – e.g. in a welcome folder in guest rooms, via signs in rooms and common areas etc.

However, it is important that guests are *actively asked* to provide feedback. It is also suggested that the criterion be updated to place an emphasis on tourist accommodation sites actively evaluating feedback and making changes where required.

This criterion will also be updated to include quality criteria, or customer experience. Taking into account stakeholder feedback, a review of other labels and an assessment of quality criteria for various types of tourist accommodation, it is suggested that this criterion is updated to take into account:

1. The collection of guest feedback for environmental *and* quality aspects.
2. A system for collecting and actioning guest comments and feedback.

The proposal for the updated criterion, below, also includes this quality aspect. This criterion will remain mandatory:

First proposal for revised criterion:

Information to guests

Guests shall be given a questionnaire asking about (1) their views on these environmental aspects of the tourist accommodation and (2) general customer satisfaction with the facilities and services of the tourist accommodation. Notices inviting guests to support the environmental objectives and encouraging feedback on all aspects of the tourist accommodation shall be visible to the guests, especially in the common areas and the rooms. A clear procedure which records customer comments, complaints and corrective actions shall be in place.

The tourist accommodation shall also provide information to the guests, including conference participants, on its environmental policy, including safety and fire safety aspects, inviting them to contribute to its implementation. The information conveyed to the guests shall refer to the actions taken on behalf of its environmental policy and provide information about the EU Ecolabel. This information shall be actively given to the guests at the reception.

Specific actions for the different areas shall be:

Concerning **energy**:

- Where applicable, according to criteria 7 and 8, inform guests on switching off heating/air conditioning and lights.

Concerning **water and waste water**:

- In the bathrooms there shall be adequate information to the guest on how to help the tourist accommodation to save water,
- The guest shall be invited to inform the staff of any leak,
- In the toilets, signs shall request guests to dispose of their waste into the waste bins instead of the toilets.

Concerning **waste**:

- The guest shall be informed about the waste reduction policy of the tourist accommodation and the use of quality product alternatives to disposable and single portion products, and should be encouraged to use non-disposable products, in case where any legislation requires the use of disposable products,
- They shall be informed how and where they can separate waste according to local or national systems within the areas belonging to the tourist accommodation and where to dispose of their hazardous substances.

Concerning **customer satisfaction**:

- The guests shall be invited to provide feedback concerning all other aspects of the tourist accommodation (this may be via an online or electronic survey).
-

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

Relevant stakeholder comments and further research after AHWG1

Several stakeholders suggested that guests are given a questionnaire asking for (1) their views on the environmental aspects of the tourist accommodation and (2) general customer satisfaction with the facilities and services provided. One stakeholder proposed that the questions be uniform to provide data “on a national and European scale” (see stakeholder comments received during and after the first AHWG in Annex III). It is proposed that such a questionnaire would not be necessary or practicable as any data gathered would be pertinent to the specific environmental policy and implementation procedure of each tourist accommodation, which are related to their own unique circumstances. The proposed criterion therefore is:

Current proposal for revised criterion:

Criterion 23: Information to guests

Guests shall be given a questionnaire asking about (1) their views on these environmental aspects of the tourist accommodation and (2) general customer satisfaction with the facilities and services of the tourist accommodation. Notices inviting guests to support the environmental objectives and encouraging feedback on all aspects of the tourist accommodation shall be visible to the guests, especially in the common areas and the rooms. A clear procedure which records customer comments, complaints and corrective actions shall be in place.

The tourist accommodation shall also provide information to the guests, including conference participants, on its environmental policy, including safety and fire safety aspects, inviting them to contribute to its implementation. The information conveyed to the guests shall refer to the actions taken on behalf of its environmental policy and provide information about the EU Ecolabel. This information shall be actively given to the guests at the reception.

Specific actions for the different areas shall be:

Concerning the EU Ecolabel for tourist accommodation:

- Guests shall be made aware of what the EU Ecolabel is, what this means for the operations of the tourist accommodation.

Concerning **energy**:

- They shall be informed that lights, air conditioning and heating systems shall be switched off when leaving the rooms.
- They shall be informed that air conditioning and heating systems shall be switched off when windows are opened.

Concerning **water and waste water:**

- In the bathrooms there shall be adequate information to the guest on how to help the tourist accommodation to save water,
- The guest shall be invited to inform the staff of any leak,
- In the toilets, signs shall request guests to dispose of their waste into the waste bins instead of the toilets.
- Staff shall be informed that washing sheets and towels gives rise to a significant environmental burden due to use of energy, water and detergents, and that sheets and towels will not be changed unless specifically requested, or by default at the frequency established by the third party environmental certification of the tourist accommodation or requested by law and/or national regulations
- Guests shall be informed as to how and where they can separate waste according to the best local or national systems within the geographic area in which the tourist accommodation is situated

Concerning **waste:**

- The guest shall be informed about the waste reduction policy of the tourist accommodation and the use of quality product alternatives to disposable and single portion products, and should be encouraged to use non-disposable products, in case where any legislation requires the use of disposable products,
- They shall be informed how and where they can separate waste according to local or national systems within the areas belonging to the tourist accommodation and where to dispose of their hazardous substances.
- Where single-use items are provided, guests should be informed of the environmental benefits of refillable/reusable products and in reducing the use of single-use products.

Concerning **customer satisfaction:**

- The guests shall be invited to provide feedback concerning all other aspects of the tourist accommodation (this may be via an online or electronic survey).

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

2.1.6.5 **Criterion 28: Energy and water consumption data**

Current criterion:

Energy and water consumption data

The tourist accommodation shall have procedures for collecting and monitoring data on overall energy consumption (kWh), electricity and other energy sources consumption (kWh), and water consumption (litres).

Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as consumption per overnight

stay and per m² of indoor area.

The tourist accommodation shall report the results yearly to the Competent Body that assessed the application.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the procedures. On application, the applicant shall provide the data for the above-listed consumptions for at least the previous six months (if available), and thereafter shall provide this data every year for the previous year or opening period.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Stakeholder feedback relating to this criterion did not suggest any updates. However, one stakeholder states that there is general recognition that data collection/measuring is important, but the current indicators (guests/m²) should be revised and reminders sent to businesses to ensure data is collected. It may be beneficial to explain why data collection is important. Furthermore, suggested indicators include: heat consumption per HDD (CDD), water consumption per guest (exclude pool), energy consumption per overnight stay and meals cooked.
2. Relevant BEMP includes: *“Undertake an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficient improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection.*
3. The Nordic Swan environmental label also has a criterion relating to energy and water consumption data. In the absence of BEMP, this has been consulted to understand best practice in collecting this data. The Nordic Swan requires measurements for:
 1. Water (litres/guest-night)
 2. Energy:
 - Option 1: Electricity and heating consumption per year and square metre.
 - Option 2: Electricity and heating consumption per year and guest night.

The criterion shall remain as:

First proposal for revised criterion:

Energy and water consumption data

The tourist accommodation shall have procedures for collecting and monitoring data on overall energy consumption (kWh), electricity and other energy sources consumption (kWh), and water consumption (litres).

Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as consumption per overnight stay and per m² of indoor area.

The tourist accommodation shall report the results yearly to the Competent Body that assessed the application.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the procedures. On application, the applicant shall

provide the data for the above-listed consumptions for at least the previous six months (if available), and thereafter shall provide this data every year for the previous year or opening period.

Relevant stakeholder comments and further research after AHWG1

Several stakeholders questioned whether the requirement in the criterion that data collected on energy and water consumption expressed as “per m² of indoor area” was applicable to all tourist accommodation services (see stakeholder comments received during and after the first AHWG in Annex III). For example, this would not be applicable to campsites.

Proposed update:

As a result of this feedback, it is proposed that reference to “per m² of indoor area” is removed from what was the previously proposed Criterion 28: Energy and water consumption data, and from the previously proposed Criterion 29: Other data collection. In response to a stakeholder suggesting merging the two criteria 28 and 29 for simplification purposes, it is proposed that this change is implemented as a revised *Criterion 30: Data collection*, since both criteria refer to the collection and communication of data.

Current proposal for revised criterion:

Criterion 24: Data collection

The tourist accommodation shall have procedures for collecting and monitoring data on overall energy consumption (kWh), electricity and other energy sources' consumption (kWh), water consumption (litres), chemicals' consumption (e.g. detergents, disinfectants, etc.) (kg and/or litres) specifying if the product is concentrated or not, and the quantity of all waste produced (litres and/or kg).

Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as consumption per overnight stay.

The tourist accommodation shall report the results yearly to the Competent Body that assessed the application.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the procedures used to collect the data (frequency and measuring method). On application, the applicant shall provide the data for the above-listed consumptions for at least the previous six months (if available), and thereafter shall provide this data every year for the previous year or opening period.

2.1.6.6 **Criterion 29: Other data collection**

Current criterion:

Other data collection

The tourist accommodation shall have procedures for collecting and monitoring data on consumption of chemicals expressed in kg and/or litres specifying if the product is concentrated or not and the quantity of waste produced (litres and/or kg of unsorted waste).

Data shall be collected where possible, monthly or at least yearly, and shall also be expressed as consumption or production per overnight stay and per m² of indoor area.

The tourist accommodation shall report the results yearly to the Competent Body that assessed the application.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the procedures. On application, the applicant shall provide the data for the above-listed consumptions for at least the previous six months (if available), and thereafter shall provide this data every year for the previous year or opening period. The applicant shall specify the services offered and if laundry is cleaned on the premises.

Feedback:

Many companies find this criterion difficult - especially measuring waste. This can also be harder for small companies. In some cases the criterion needs to be clarified so companies know what to measure.

Suggestions for changes include:

- (data on chemicals) This is very onerous and would perhaps be better focussed on potentially harmful chemicals. It should also be borne in mind that some chemicals are necessary for health and safety and mould reasons.
- To collect and monitor data on consumption of chemicals expressed in kg and/or litres specifying if the product is concentrated or not, is not difficult and is right. But to quantify litres and/or kg of unsorted waste produced is more difficult to do in some products.

BEMP:

BEMP is that “appropriate environmental indicators are measured at the process level and associated with best practise techniques”. No specific BEMP has been added (since the previous revision for tourist accommodation) which specific data collection for chemical use and waste production.

Other updates:

It is also suggested that the criterion is updated to encourage measurement of sorted waste, rather than unsorted. Waste will already be separated (where applicable) in accordance with Criterion 18 and 19, and will be useful to help with monitoring and evaluation of the measures and targets set within the environmental programme (Criterion 25). This data may also be useful to the tourist accommodation to facilitate better waste management.

Proposal for revised criterion:

Other data collection

The tourist accommodation shall have procedures for collecting and monitoring data on consumption of chemicals expressed in kg and/or litres specifying if the product is concentrated or not and the quantity of waste produced (litres and/or kg of sorted waste).

Data shall be collected where possible, monthly or at least yearly, and shall also be expressed as consumption or production per overnight stay and per m² of indoor area.

The tourist accommodation shall report the results yearly to the Competent Body that assessed the application.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the procedures. On application, the applicant shall provide the data for the above-listed consumptions for at least the previous six months (if available), and thereafter shall provide this data every year for the previous year or opening period. The applicant shall specify the services offered and if laundry is cleaned on the premises.

Relevant stakeholder comments and further research after AHWG1

Following stakeholder feedback on the previously proposed Criterion 28 above (see stakeholder comments received during and after the first AHWG in Annex III), it is proposed that the two criteria 28 and 29 are merged into one criterion ("Data collection") that deals with data collection and communication procedures for energy, water (Criterion 28), chemicals and waste (Criterion 29) (see above).

2.1.6.7 **Criterion 30: Information appearing on the eco-label**

Current criterion:

Information appearing on the eco-label

Box 2 of the eco-label shall contain the following text:

— This tourist accommodation is actively taking measures to use renewable energy sources, save energy and water, to reduce waste, to improve the local environment.

Assessment and verification: The applicant shall provide a sample of how they will use the label, together with a declaration of compliance with this criterion.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received on this criterion.
2. The Directive which regulates the EU Ecolabel (Regulation (EC) No 66/2010) has not been updated; this Directive still specifies that products or services should contain a descriptive text on any eco-labels displayed.

The criterion shall remain as:

First proposal for revised criterion:

Information appearing on the Ecolabel

Box 2 of the Ecolabel shall contain the following text:

— This tourist accommodation is actively taking measures to use renewable energy sources, save energy and water, to reduce waste, to improve the local environment.

Assessment and verification: The applicant shall provide a sample of how they will use the label, together with a declaration of compliance with this criterion.

Relevant stakeholder comments and further research after AHWG1

Stakeholder feedback on the issue of using the information about the EU Ecolabel to promote the tourist accommodation once an award of licence has been made questioned whether this should be a 'criterion' or moved to the User Manual (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update:

This is a horizontal criterion to all product groups and is proposed to retain as it is. (Criterion 25)

2.1.7 Optional criteria related to energy

2.1.7.1 **Criterion 31: Generation of electricity through renewable energy sources**

Current criterion:**Generation of electricity through renewable energy sources (up to 4 points)**

The tourist accommodation shall have a photovoltaic (solar panel) or local hydroelectric system, geothermal, biomass or wind power electricity generation that supplies or will supply at least 20% of the overall electricity consumption per year (2 points).

The tourist accommodation shall introduce into the grid a net amount of electrical energy produced from renewable energy sources (2 points).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the photovoltaic, hydroelectric, geothermal, biomass or wind power system and data on both its potential and actual output and documentation regarding the electricity flows from and to the grid as proof of any net contribution or electricity from renewable energy sources to the grid.

Feedback:

Feedback suggested that there is some confusion as to how this optional criterion (Criterion 31: Generation of electricity through renewable energy sources) differs from Criterion 1: Electricity from renewable sources. It is important that this is clarified in any updated criterion.

Stakeholders also outlined the difficulties in achieving 20% consumption per year (as outlined in the criterion) especially where energy generation is dependent on weather conditions. It was suggested that a 10% level could also be added to better reflect this difficulty. It was also suggested that more points should be awarded to this criterion according to the investment made.

BEMP:

BEMP is to “install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier”. Renewable energy generation is currently encouraged in this EU Ecolabel criterion.

Other updates:

This criterion needs to be better distinguished from Criterion 1: Electricity from renewable energy sources. This criterion (unlike Criterion 1) refers specifically to on-site generation carried out by the tourist accommodation. This should be clarified in the criterion.

In addition, it is suggested that the section referring to ‘Net amount to grid’ should be removed – this is not defined in the BEMP and removes the focus from use of renewable energy by the tourist accommodation.

Proposed update:

The criterion has been updated to allocate points where both 10% and 20% of electricity is generated by renewable energy sources, as suggested by stakeholder feedback. In addition, the use of on-site renewable energy generation has been clarified.

First proposal for revised criterion:**Generation of electricity by the tourist accommodation through renewable energy sources (up to 4 points)**

The tourist accommodation shall have on site renewable energy generation, which may include: photovoltaic (solar panel) or local hydroelectric system, geothermal, biomass or wind power electricity generation, that supplies or will supply:

a) at least 10% of the overall electricity consumption per year (2 points).

or

b) at least 20% of the overall electricity consumption per year (4 points).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the photovoltaic, hydroelectric, geothermal, biomass or wind power system and data on both its potential and actual output.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the First Ad Hoc Working Group are noted in Annex III. Several stakeholders were in favour of making on site self-generation of electricity through renewable energy sources a mandatory criterion. However, the BEMP: “to install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine renewable electricity supplier”, recognises that access to on site self-generation is not widely available, especially in urban areas where many accommodation sites are located.

A stakeholder suggested that a clause is included in the criterion that requires applicants, whose production leads to generation of Guarantees of Origin, that these Guarantees of Origin have to be cancelled on behalf of the local consumption to avoid that these GOs ending up on the market.

Proposed update

It is proposed to keep the criterion optional. Hopefully, the mandatory criterion will encourage some 'demand pull' for the generation of electricity from renewable sources and the optional criteria will reward those applicants that have already invested in onsite generation. Furthermore, the criteria title has been changed in order to clarify that the aim of the criteria is to encourage self-generated electricity from renewable energy, no matter if it is directly consumed or put into the grid that might be a usual practice in several countries. It is proposed that a requirement is included that specifies that applicants must cancel the GOs generated.

For the assessment and verification section, it is proposed that, at the time of application, the data gathered from the previous year for the calculation is valid, since this is a forecasting criterion.

Current proposal for revised criterion:

Criterion 26: On site self-generation of electricity through renewable energy sources (up to 4 points)

The tourist accommodation shall have on site electricity generation from renewable energy sources, which may include: photovoltaic (solar panel) or local hydroelectric system, geothermal, biomass or wind power electricity generation, that generates:

a) at least 10% of the overall electricity consumption per year (2 points).

or

b) at least 20% of the overall electricity consumption per year (4 points).

If the self-generation of renewable electricity leads to the issuing of Guarantees of Origin, the self-generation can only be taken into account if the Guarantees of Origin do not end up on the market, but are cancelled to cover the local consumption.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the photovoltaic, hydroelectric, geothermal, biomass or wind power system and data on its actual output. To demonstrate the capacity

to fulfil criterion, the calculation of the % generated of the overall consumption of the previous year to the application shall be valid.

2.1.7.2 **Criterion 32: Energy from renewable energy sources**

Current criterion:

Energy from renewable energy sources (up to 2 points)

At least 70% of the total energy used to heat or cool either the rooms or to heat sanitary water shall come from renewable energy sources. (1.5 points, 2 points for 100% of the tourist accommodation's energy used for that purpose, coming from renewable energy sources).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on the energy consumed in heating rooms and hot water and documentation showing that at least 70% or 100% of this energy comes from renewable energy sources.

Feedback:

No stakeholder feedback was received for this criterion.

BEMP:

BEMP is to encourage the use of renewable energy through either “on-site geothermal, solar or wind energy generation where appropriate” and through procurement of “electricity from genuine (verifiable additional) renewable electricity supplier.” This is in line with the current EU Ecolabel criterion.

Proposed update:

Although this criterion is in line with BEMP, it is proposed that this is updated to include energy for all purposes, rather than just “to heat or cool either the rooms or to heat sanitary water”. This also brings the criterion in line with Criterion 1 which does not limit the requirement of ‘energy from renewable sources’ to just heating and cooling.

First proposal for revised criterion:

Energy from renewable energy sources (up to 2 points)

At least 70% of the total energy used by the tourist accommodation for all purposes shall come from renewable energy sources. (1.5 points, 2 points for 100% of the tourist accommodation's energy used for that purpose, coming from renewable energy sources).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on energy consumed and documentation showing that at least 70% or 100% of this energy comes from renewable energy sources.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the First Ad Hoc Working Group are noted in Annex III.

Proposed update

It is proposed to split the criterion into two criteria. In one side, it is proposed to retain the criterion addressing the heating energy. The text has been reverted to the original text.

In the other side, it is suggested to address the purchase of ecolabelled electricity. Considering the additional environmental (see section 2.1.1.1), aspects of EKOenergy electricity and the availability of other Type I ecolabels for electricity it is suggested to award points if the electricity is eco labelled, as a this type of standard can help to 'push' the market.

Current proposal for revised criterion:

Criterion 27: Heating energy from renewable energy sources (up to 2 points)

At least 70% of the total energy used to heat or cool either the rooms or to heat sanitary water shall come from renewable energy sources. (1.5 points, 2 points for 100% of the tourist accommodation's energy used for that purpose, coming from renewable energy sources).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on energy consumed and documentation showing that at least 70% or 100% of this energy comes from renewable energy sources.

Current proposal for revised criterion:

Criterion 28: Procurement of labelled electricity (up to 2 points)

100% of the electricity procured has been awarded an environmental label certified by a third party (2 points).

Assessment and verification: The applicant shall supply a declaration from (or the contract with) the electricity supplier indicating that 100% of electricity purchased is certified or has been awarded a third party certified environmental label.

2.1.7.3 **Criterion 33: Boiler energy efficiency**

Current criterion:

Boiler energy efficiency (1.5 points)

The tourist accommodation shall have a 4 star boiler(s) as defined by Directive 92/42/EEC.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with adequate documentation.

Feedback:

A number of stakeholders commented that this criterion should be brought into line with existing ISO-Type 1 eco-labels, including the EU Ecolabel. These may include, for example:

- the EU Ecolabel criterion for water based space heaters
- Blue Angel for gas and oil heaters
- Austrian Ecolabel for Wood-Fired Heating Systems.

BEMP:

BEMP is to install the most efficient HVAC systems. This is in line with the current EU Ecolabel criterion.

Other updates:

It is suggested that the current criterion 'boiler energy efficiency' is updated with this to encourage take up of this new EU Ecolabel criterion.

Proposed update:

It is proposed that this criterion is brought into line with the EU Ecolabel for water based space heaters. Although other ISO-Type I labels are available for boilers, the scope of each of these is very different and so it is not feasible to develop one criterion which covers all of these labels. In addition, the EU Ecolabel for water based space heaters is broad, and encompasses a wider variety of products than the previous criterion for 'boilers'. The following update is therefore proposed.

First proposal for revised criterion:**Water Based Space Heaters energy efficiency (1.5 points)**

The water based heating system/unit shall have been awarded an EU Ecolabel licence in accordance with Commission Decision of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters (2014/314/EU) or other ISO Type 1 eco-labels.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a copy of the Ecolabel or other ISO Type 1 eco-labels certificate.

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received for this criterion.

Proposed update

The title of the criterion has been modified to include space and water heating technologies and has been aligned to proposed mandatory criterion. Although the EU Ecolabel only addresses space and combination heaters there might be other ISO Type I ecolabel for water heaters.

Current proposal for revised criterion:**Criterion 29: Efficient space and water heating appliances (1.5 points)**

The tourist accommodation shall have a water based heating system/unit that has been awarded an EU Ecolabel licence in accordance with Commission Decision of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters (2014/314/EU)

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a copy of the EU Ecolabel or other ISO Type 1 ecolabels certificate.

2.1.7.4 Criterion 34: Boiler NOx emissions**Current criterion:****Boiler NOx emissions (1.5 points)**

The boiler(s) shall be class 5 of the EN 297 prA3 norm regulating NOx emissions, and shall emit less than 60 mg NOx/kWh (gas condensing boilers) or 70 mg NOx/kWh (non-condensing gas boilers up to nominal output of 120 kW).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a report or technical specifications from the professional technicians responsible for the sale and/or maintenance of the boiler.

Feedback:

Only one comment was received for this criterion which suggested that this criterion should be updated to include a more general definition which comprises other types of heaters (for example biomass).

BEMP:

There is no specific BEMP guidance for setting limits for boiler NO_x emissions. However, regular maintenance of all HVAC equipment is encouraged.

Other updates:

It is suggested that the current criterion 'boiler energy efficiency' is updated with this to encourage take up of this new EU Ecolabel criterion. In addition, the EU Ecolabel for water based space heaters is broad, and encompasses a wider variety of products than the previous criterion for 'boilers' – broadening this criterion was suggested by stakeholders.

Proposed update:

It is proposed that this criterion is updated to take into account EU Ecolabel criterion for water based space heaters. The criterion also includes a methodology for calculation. (see update of assessment and verification section below).

The following is proposed:

First proposal for revised criterion:**Water Based Space Heater NO_x emissions (1.5 points)**

The nitrogen oxide (NO_x) content of the exhaust gas shall not exceed the limit values indicated in the table below (not applicable to electrical heaters):

Heat generator technology	NO _x emission limit
Gas heaters	Equipped with internal combustion engine: 170 mg/kWh GCV energy input Equipped with external combustion: 36 mg/kWh GCV energy input
Liquid fuel heaters	Equipped with internal combustion engine: 380 mg/kWh GCV energy input Equipped with external combustion: 100 mg/kWh GCV energy input
Solid fuel heaters	150 mg/Nm ³ at 10% O ₂

Assessment and verification: The applicant shall provide a report or technical specifications from the professional technicians responsible for the sale and/or maintenance of the water based space heater. The calculation shall be in accordance with Appendix 1 of Commission Decision of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters.

Relevant stakeholder comments and further research after AHWG1

There was no stakeholder feedback on whether the current allocation of points for the proposed criteria should be adjusted. One comment was received that suggested it would be difficult to assess NO_x emissions data for older boilers since they are not usually provided by the manufacturer (see stakeholder comments received during and after the first AHWG in Annex III). However, most boiler manufacturers should provide this data if requested.

NO_x air emissions cause acidification and are produced during combustion of fuels in two different ways:

- (i) oxidation of the nitrogen content of the fuels, and

(ii) as a result of chemical reactions between the oxygen and nitrogen molecules in the air triggered by the specific combustion conditions. This occurs only when there is enough air available, when the temperature is high enough (above 1200 °C) and when there is enough time (residence time) for the reaction to take place at this high temperature.

NO_x requirements from several product policy schemes are presented in

Table 12. Comparison of NO_x emission limits in different product policy schemes

Heat generator technology	Ecodesign ¹⁾	EU Ecolabel ²⁾	Blue Angel ³⁾	Nordic Ecolabel ⁴⁾	Austrian Eco-label ⁵⁾	GPP ⁶⁾
Gas fuel boiler	56 mg/kWh	36 mg/kWh GCV energy input	40 mg/kWh	N/A	N/A	Condensing: 60 mg/kWh Non-condensing: 70 mg/kWh
Liquid fuel boiler	120 mg/kWh	100 mg/kWh GCV energy input	N/A	N/A	N/A	120 mg/kWh
Solid fuel boiler	N/A	150 mg/Nm ³ at 10 % O ₂	Pellets: 150 mg/Nm ³ Chips: 190 mg/Nm ³	340 mg/m ³	Automatic: 100 mg/MJ (pellets); 120 mg/MJ (chips); Manual: 120 mg/MJ	340 mg/Nm ³
Fuel-driven heat pump	Gas fuel: 70 mg/kWh (external); 240 mg/kWh (internal) Liquid fuel: 120 mg/kWh (external); 420 mg/kWh (internal)	Gas fuel: 36 mg/kWh (external); 170 mg/kWh (internal) Liquid fuel: 100 mg/kWh (external); 380 mg/kWh (internal)	External: 40 mg/kWh Internal: 100 mg/Nm ³	No limit	N/A	No limit
Electrically-driven heat pump	No limit	No limit	No limit	No limit	N/A	No limit
Cogeneration	Gas fuel: 70 mg/kWh (external); 240 mg/kWh (internal) Liquid fuel: 120 mg/kWh (external); 420 mg/kWh (internal)	Gas fuel: 170 mg/kWh GCV energy input Liquid fuel 380 mg/kWh GCV energy input	Gas fuel: 250 mg/Nm ³ Liquid fuel: 2500 mg/Nm ³	N/A	N/A	No limit

¹⁾ Implementing Measure for Ecodesign Lot 1 Regulation EU no 813/2013

²⁾ EU Ecolabel criteria for: water-based heaters. Commission Decision 2014/314/EU

³⁾ Blue Angel criteria for: gas-fired calorific-value heating devices; wood-pellet boilers; heat pumps using absorption and adsorption technology or operating by use of combustion engine-driven compressors; heat pumps using an electrically powered compressor; small-scale gas-fired cogeneration modules; and small-scale liquid-fired cogeneration modules. In the Blue Angel, emissions of solid biomass boilers are measured at 13 % O₂ and should be multiplied by 1.375 to be at 10 % O₂.

⁴⁾ Nordic Ecolabelling criteria for: solid biofuel boilers; and heat pumps.

⁵⁾ Austrian Eco-Label criteria for: wood-fired heating systems. The Austrian Eco-Label sets NO_x emissions in mg/MJ: 100 mg/MJ ≈ 206 mg/Nm³; 120 mg/MJ ≈ 248 mg/Nm³.

⁶⁾ EU GPP criteria for: combined heat and power; and EU GPP preparatory work for: boilers; and heat pumps and air conditioning.

Ecodesign requirements for water-based heaters using gas and liquid fuels are set out in Commission Regulation (EU) No 813/2013, and the limits for NO_x emissions will come into force on 26 September 2018. The regulation specifies that emissions shall be measured according to standard rating conditions and rated heat output, and the test methods described in the Communication 2014/C. Those requirements do not apply to existing heaters, and therefore, the limit values on NO_x emissions would entail an additional effort while alignment to mandatory requirements across Europe is secured.

For solid fuel heaters, a distinction is made between wood pellets and chips in the Blue Angel and Austrian Eco-label; with values in the Blue Angel criteria (150 mg/Nm³ at 13 O₂ % = 206

mg/Nm³ at 10 O₂ %; and 190 mg/Nm³ at 13 O₂ % = 261 mg/Nm³ at 10 O₂ %) and Austrian Eco-label criteria (100 mg/MJ = 206 mg/Nm³ at 10 O₂ %; and 120 mg/MJ = 248 mg/Nm³ at 10 O₂ %). On-going discussion for Ecodesign Lot 15 (solid fuel boiler heaters) are however currently indicating a level of 200 mg/Nm³ at 10% O₂, which would also be reasonable for the purpose of this criterion. This limit value is expressed as seasonal space heating emissions, i.e. an average between full and part load conditions.

Proposed update

Against this background it is proposed to slightly modify the NO_x emission limits as follows and to introduce a table to act as a guide on the calculation of emissions for solid heaters.

Current proposal for revised criterion:

Criterion 30: Water Based Space Heater NO_x emissions (1.5 points)

For all water based space heaters in the tourist accommodation the nitrogen oxide (NO_x) content of the exhaust gas shall not exceed the limit values indicated in the table below:

Heat generator technology	NO _x emission limit
Gas heaters	Equipped with internal combustion engine: <u>240</u> mg/kWh GCV energy input Equipped with external combustion: <u>56</u> mg/kWh GCV energy input
Liquid fuel heaters	Equipped with internal combustion engine: <u>420</u> mg/kWh GCV energy input Equipped with external combustion: <u>120</u> mg/kWh GCV energy input
Solid fuel heaters	<u>200</u> mg/Nm ³ at 10% O ₂

NO_x emissions shall be measured as the sum of nitrogen monoxide and nitrogen dioxide and at the following operating conditions:

- Gas and liquid heaters, at standard rating conditions and rated heat output.
- Solid fuel heaters, as seasonal space heating emissions according to the table below.

Methodology to calculate the seasonal space heating emissions

Type of solid fuel boiler	Formula
<u>Manually stoked solid fuel boilers that can be operated at 50% of the rated heat output in continuous mode, and automatically stoked solid fuel boilers</u>	$E_s = 0.85 \times E_{s,p} + 0.15 \times E_{s,r}$
<u>Manually stoked solid fuel boilers that cannot be operated at 50% or less of the rated heat output in continuous mode, and solid fuel cogeneration boilers</u>	$E_s = E_{s,r}$

Where:

E_s are the seasonal space heating emissions.

E_{s,p} are the emissions of respectively particulate matter, organic gaseous compounds,

carbon monoxide and nitrogen oxides measured at 30% or 50% of rated heat output, as applicable.

$E_{s,r}$ are the emissions of respectively particulate matter, organic gaseous compounds, carbon monoxide and nitrogen oxides measured at rated heat output.

Assessment and verification: The applicant shall provide a report or technical specifications from the professional technicians responsible for the sale and/or maintenance of the water based space heaters. The calculation shall be in accordance with Appendix 1 of Commission Decision of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters.

2.1.7.5 **Criterion 35: District heating**

Current criterion:

District heating (1.5 points)

The heating of the tourist accommodation shall be provided by efficient district heating, for the purposes of the eco-label defined as follows.

Generation of heat is done either in high efficiency cogeneration units as defined by Directive 2004/8/EC and any other Commission instruments adopted in application of that Directive, or in heat only boilers with an efficiency that matches or surpasses the applicable reference value established by Commission Decision 2007/74/EC.

And in addition:

— The pipes in the district heating distribution network shall meet the requirements as laid out in the applicable CEN standards for such pipes.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation showing connection to the district heating.

Regulation:

Directive 2004/8/EC [OJ L 52, 21.2.2004, p.50] was repealed by Directive 2012/27/EU of the European parliament and of the Council [OJ L 315, 14.11.2012, p.1] on the 5 June 2014. However, the definition for 'high efficiency cogeneration units' remains unchanged. Commission Decision 2007/74/EC was repealed by Commission Implementing Decision 2011/877/EU [OJ L 343, 19.12.2011, p.91]. Harmonised efficiency reference values for separate production of heat remain unchanged.

Feedback:

Only one stakeholder comment was received for this criterion, which suggested that the option "use of industrial waste heat" could be added.

BEMP:

BEMP does not cite specific requirement for district heating; rather that all heating/cooling systems should be efficient and appropriate for the tourist accommodation – this is specified in the existing criterion.

Proposed update:

The criterion shall largely remain as before, with one update to reflect a change in Regulation:

First proposal for revised criterion:

District heating (1.5 points)

The heating of the tourist accommodation shall be provided by efficient district heating. For the purposes of the EU Ecolabel this is defined as follows.

Generation of heat either by high efficiency cogeneration units as defined by [Directive 2012/27/EU](#) and any other Commission instruments adopted in application of that Directive, or by heat only boilers with an efficiency that matches or surpasses the applicable reference value established by [Commission Decision 2011/877/EU](#).

And in addition:

— The pipes in the district heating distribution network shall meet the requirements as laid out in the applicable CEN standards for such pipes.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation showing the connection to the district heating system.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the First Ad Hoc Working Group are noted in Annex III. A stakeholder (Competent Body) suggested only awarding 1.5 points to applicants using district heating and also suggests not considering the directive and pipe requirements, which are difficult to verify. However, other stakeholders were in favour of adding more points, owing to the associated difficulties and costs.

Cogeneration or Combined Heat and Power generation, both on-site and off-site (district heating), has a significant potential for saving primary energy in the energy transformation process. The International Energy Agency has addressed the assessment of the CHP through cost-benefit analysis in two reports released in 2008 and 2009 (IEA, 2008 and IEA 2009). Some of the main conclusions were that CHP can reduce CO₂ emissions arising from new generation in 2015 by more than 4% (170 Mt/year), while in 2030 this saving increases to more than 10% (950 Mt/year). These savings are attained due to a more efficient process (recovery of waste heat) together with a decrease of transmission and distribution losses, since the energy transformation is produced closer to the consumption centres (distributed generation).

Proposed update

It is proposed to merge criteria on district heating and cogeneration as they are addressing the same environmental aspect. Additionally with regard to the potential for saving primary energy and the associated costs of these systems it is proposed to increment the points allocated to this optional criterion.

Current proposal for revised criterion:

Criterion 31: Efficient heating generation (up to 4 points)

The heating of the tourist accommodation shall be provided by efficient district heating. For the purposes of the EU Ecolabel this is defined as follows. (2 points)

Generation of heat either by high efficiency cogeneration units as defined by [Directive 2012/27/EU](#) and any other Commission instruments adopted in application of that Directive, or by heat only boilers with an efficiency that matches or surpasses the applicable reference value established by [Commission Decision 2011/877/EU](#).

Electricity and heating of the sanitary facilities, common areas and rental accommodation shall be provided by a high efficiency cogeneration unit according to Directive 2012/27/EU. If the tourist accommodation has such cogeneration unit on site its output of heat and electricity shall supply at least 70% of the total heat and electricity consumption on site. The supply shall be calculated in accordance with the methodology provided by Directive 2012/27/EU. (2 points)

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the district heating system and/or the combined heat and power plant.

2.1.7.6 **Criterion 36: Combined heat and power — cogeneration**

Current criterion:

Combined heat and power — cogeneration (1.5 points)

Electricity and heating of the sanitary facilities, common areas and rental accommodation shall be provided by a high efficiency cogeneration unit according to Directive 2004/8/EC. If the tourist accommodation service has such cogeneration unit on site its output of heat and electricity shall supply at least 70% of the total heat and electricity consumption on site. The supply shall be calculated in accordance with the methodology provided by Directive 2004/8/EC.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the combined heat and power plant.

Regulation:

Directive 2004/8/EC [OJ L 52, 21.2.2004, p.50] was repealed by Directive 2012/27/EU of the European parliament and of the Council [OJ L 315, 14.11.2012, p.1] on the 5 June 2014. However, there has been no change in definition, criteria or methodology. The methodology for detailed in Directive 2004/8/EC which must be used to calculate the heat and energy supply from the cogeneration unit is also unchanged in Directive 2012/27/EU.

Feedback:

No feedback was received for this criterion.

BEMP:

Best practice efficiency ratings for combined heat and power units are not specifically outlined in BEMP.

Proposed update:

The criterion needs to be updated to reflect a change in Regulation. No other changes are required.

The criterion shall be updated to:

First proposal for revised criterion:

Combined heat and power — cogeneration (1.5 points)

Electricity and heating of the sanitary facilities, common areas and rental accommodation shall be provided by a high efficiency cogeneration unit according to Directive 2012/27/EU. If

the tourist accommodation service has such cogeneration unit on site its output of heat and electricity shall supply at least 70% of the total heat and electricity consumption on site. . The supply shall be calculated in accordance with the methodology provided by Directive 2012/27/EU.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the combined heat and power plant.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the First Ad Hoc Working Group are noted in Annex III. Limited stakeholder feedback was received regarding this criterion.

Several stakeholders are in favour of adding more points, in accordance with the cost of this type of equipment. Taking into account that several optional criteria are proposed to be deleted in order to simplify a large criteria set and to focus on environmental hot spots, a reallocation of a number of points is needed.

Proposed update

This criterion is proposed to be merged with previous criterion. (See section 2.1.7.5)

2.1.7.7 Criterion 37: Heat pump

Current criterion:

Heat pumps (up to 2 points)

The tourist accommodation shall have a heat pump providing heat and/or air conditioning (1.5 points). The tourist accommodation shall have a heat pump with the Community eco-label or another ISO Type I eco-label (2 points).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the heat pump.

Feedback:

No feedback was received for this criterion.

BEMP:

BEMP recognises that heat pumps can be beneficial for reducing energy consumption. However, no best practice efficiency ratings are suggested, instead BEMP recommends the installation of “efficient (e.g. ecolabelled) heat pumps for heating and cooling, or where possible ground water cooling”.

Proposed update:

It has been proposed that Criterion 33 should be expanded from the energy efficiency of ‘boilers’ to ‘water based space heaters’. This criterion then aligns with the development of EU Ecolabel for water based space heaters. Heat pumps are included within the scope of this updated Criterion 33, and so it is proposed that Criterion 37: Heat pump is removed to ensure points are not awarded under two criteria for the same thing.

This criterion should be removed.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the First Ad Hoc Working Group are noted in Annex III. Limited stakeholder feedback was received regarding this criterion. A stakeholder requested reintroducing this criterion as heat pumps are not on the scope of water base heaters.

Proposed update

In order to recognise the better efficiency and environmental performance of heat pumps, the optional criterion awarding its use and especially the use of EU Ecolabel heat pumps has been reintroduced. The current text has been modified to avoid air conditioners being awarded points in this criterion. Definitions from the commission decision establishing the ecological criteria for the award of the EU Ecolabel to electrically driven, gas driven or gas absorption heat pumps [OJ L 301/14, 20.11.2007] could be included in the user manual in order to help applicants and Competent Bodies assess this criterion.

As several criteria have been removed in order to simplify the criteria set, some points should be reallocated to other criteria in order to keep the scoring rules of the points system. It is suggested that extra points are allocated to this criterion as this is an environmental hot spot highlighted by BEMP.

Further specification has been made on the assessment and verification text.

Current proposal for revised criterion:

Criterion 32: Heat pump (up to 3 points)

The tourist accommodation shall have a heat pump providing heating or heating and air conditioning (1.5 points). The tourist accommodation shall have a heat pump with the EU Ecolabel in accordance with Commission Decision of 9 November 2007 establishing the criteria for the award of the EU Ecolabel for to electrically driven, gas driven or gas absorption heat pumps (2007/742/EU) (3 points)

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the heat pump. Where EU Ecolabel heat pump products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2007/742/EC.

2.1.7.8 **Criterion 38: Heat recovery**

Current criterion:

Heat recovery (up to 1.5 points)

The tourist accommodation shall have a heat recovery system for 1 (1 point) or 2 (1.5 points) of the following categories: refrigeration systems, ventilators, washing machines, dishwashers, swimming pool(s), sanitary waste water.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the heat recovery systems.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received for this criterion.
2. BEMP is to encourage the installation of heat recovery systems where possible – as encouraged in the current EU Ecolabel criterion.

The criterion shall remain as:

First proposal for revised criterion:

Heat recovery (up to 1.5 points)

The tourist accommodation shall have a heat recovery system for 1 (1 point) or 2 (1.5 points) of the following categories: refrigeration systems, ventilators, washing machines, dishwashers, swimming pool(s), sanitary waste water.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the heat recovery systems.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the First Ad Hoc Working Group are noted in Annex III. Stakeholder feedback on the current allocation of points for the proposed criterion suggested that stakeholders are in favour of increasing the number of points from the current 1.5 due to the “difficulty of fulfilling the criterion”.

Proposed update

The criterion shall remain as previously proposed but the number of points awarded has been increased in order to recognise the relatively high investment required to introduce a heat recovery system and that it is a hot spot identified in BEMP. The assessment and verification text has been further specified.

Current proposal for revised criterion:

Criterion 33: Heat recovery (up to 3 points)

The tourist accommodation shall have a heat recovery system for one (1 point) or two (1.5 points) of the following categories: refrigeration systems, ventilators, washing machines, dishwashers, swimming pool(s), sanitary waste water.

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

2.1.7.9 **Criterion 39: Thermoregulation**

Current criterion:

Thermoregulation (1.5 points)

The temperature in every common area and rental accommodation shall be individually regulated.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the thermoregulatory systems

Feedback:

No stakeholder feedback was received for this criterion.

BEMP:

BEMP states that “Gas- and oil-fired boilers and individual room air-conditioning units do not represent best practice with respect to heating and cooling sources. However, where they are installed, the highest seasonal energy efficiency ratio, for example reflected in an ‘A’ rated European Energy Label, should be sought for all new appliances. Information should be sought on full and part load efficiency.”

Proposed updates:

It is proposed that this criterion is maintained, but that the purpose (i.e. to ensure energy efficiency) is outlined. It should be clear that this criterion applies to common areas only – not individual guest rooms where air conditioning controls can be counter-productive in terms of energy saving.

First proposal for revised criterion:

Thermoregulation (1.5 points)

The temperature in every common area (for example restaurants, lounge areas, and conference rooms) and guest accommodation shall be individually regulated in order to meet the needs of the guests whilst also ensuring energy efficiency.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the thermoregulatory systems

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the First Ad Hoc Working Group are noted in Annex III. Limited stakeholder feedback was received regarding this criterion.

Maintaining moderate thermostat setpoints during the summer and winter reduces the amount of energy required for cooling and heating, respectively. Additionally, guest-controlled thermostats allow guests to adapt their room temperature to their own comfort level. However this can lead to wasted energy by guests. By limiting guest controlled thermostats to within a designated range could save energy while still providing individual control to each guest room.

Tripadvisor Greenleaders [Tripadvisor Greenleaders (2013)], proposes as optional requirements the setting of indoor cooling/heating temperatures for common areas and guest rooms.

The standard EN15251 for Indoor environmental input parameters for design and assessment of energy performance of buildings addressing indoor air quality, thermal environment, lighting and acoustics reveals the following recommended indoor temperatures:

Figure 7: Recommended design values of the indoor temperature for design of buildings and HVAC systems

Type of building/ space	Category	Operative temperature °C	
		Heating (winter season), ~ 1,0 clo	Cooling (summer season), ~ 0,5 clo
Residential buildings: living spaces (bed rooms, drawing room, kitchen etc) Sedentary ~ 1,2 met	A	21,0	25,5
	B	20,0	26,0
	C	18,0	27,0

Source: EN 15251

Proposed update

In order to ensure energy efficiency, it is proposed that this criterion is maintained and partially aligned to Tripadvisor Greenleaders requirements on indoor/guestrooms' thermoregulation and to EN15251 recommended values. Additionally, the awarded points are proposed to be reallocated recognising the different actions that can be taken in order to save energy.

Current proposal for revised criterion:

Criterion 34: Thermoregulation (up to 3 points)

The temperature in every common area (for example restaurants, lounge areas, and conference rooms) shall be individually regulated within the following designated range:

- Temperature setpoint, while in cooling mode, is set at or above 25.5°C for the duration of the summer. (0.75 points)

- Temperature setpoint, while in heating mode, is set at or below 21°C for the duration of the winter. (0.75 points)

The temperature in every guest rooms shall be regulated by guests in order to meet their needs. The temperature shall allow individual regulation within the following designated range:

-Temperature setpoint, while in cooling mode, is set at or above 25.5°C for the duration of the summer.(0.75 points)

-Temperature setpoint, while in heating mode, is set at or below 21°C for the duration of the winter. (0.75 points)

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the thermoregulatory systems and the setpoint range.

2.1.7.10 Criterion 40: Energy performance audits for buildings

Current criterion:

Energy performance audits for buildings (1.5 points)

The tourist accommodation service shall be subject to a biannual energy performance audit by an independent expert and implement at least two recommendations on improving the energy performance resulting from the audit.

Assessment and verification: the applicant shall provide the energy performance audit report and provide detailed documentation on how the tourist accommodation has fulfilled this criterion.

Feedback:

There were a number of stakeholder comments on this criterion – these related to:

- Suggestion that audits should not be undertaken bi-annually, but instead according to national regulation or less often (every five years was suggested by one respondent).
- More points should be awarded for this criterion as fulfilling this can be costly.
- It was suggested that in the first instance, a pre-diagnosis including recommendations would be a good incentive to help tourist accommodation owners improve energy efficiency. A full energy performance audit would then not be needed, or at least not needed as often.

BEMP:

BEMP is to: *“Ensure that new buildings are compliant with the highest achievable energy ratings, as indicated by conformance with PassiveHouse and Minergie P standards, and that existing buildings are retrofitted to minimise heating and cooling energy requirements.”*

PassiveHouse and Minergie P standards are voluntary standard for energy efficiency in a building, reducing its ecological footprint .Although it is mostly applied to new buildings; it has also been used for refurbishments.

The new-build Passivhaus Standard requires:

- a maximum space heating and cooling demand of less than 15 kWh/m².year or a maximum heating and cooling load of 10W/m²
- a maximum total primary energy demand of 120 kWh/m²/year
- an air change rate of no more than 0.6 air changes per hour @ 50 Pa

The Passivhaus refurbishment standard, EnerPHit, requires:

- a maximum space heating and cooling demand of less than 25 kWh/m².year or a maximum heating and cooling load of 10W/m²
- a maximum total primary energy demand of 120 kWh/m²/year + heat load factor
- an air change rate of no more than 1.0 air changes per hour @ 50 Pa

To achieve the Passivhaus Standard in the UK typically involves:

- very high levels of insulation
- extremely high performance windows with insulated frames
- airtight building fabric
- 'thermal bridge free' construction
- a mechanical ventilation system with highly efficient heat recovery

As of January 2010, there were approximately 25,000 such certified structures of all types in Europe

Proposed updates:

It is suggested that the current criterion is updated to reflect stakeholder feedback – an annual audit is sufficient. This criterion should be achievable by all applicants and types of tourist accommodation, and a costly bi-annual audit may be restrictive. Consideration of PassivHaus standards should be made, as outlined in the BEMP.

The following is therefore proposed:

First proposal for revised criterion:

Energy performance audits for buildings (1.5 points)

The tourist accommodation shall be subject to an annual energy performance audit by an independent expert and implement at least two recommendations on improving the energy performance resulting from the audit.

OR

The tourist accommodation has been certified to PassivHaus or Minergie P standards.

Assessment and verification: the applicant shall provide the energy performance audit report (each time it is undertaken) and provide detailed documentation on how the tourist accommodation has fulfilled this criterion. Documents relative to PassivHaus or Minergie P standards should be provided.

Relevant stakeholder comments and further research after AHWG1

Stakeholder comments received during and after the First Ad Hoc Working Group are noted in Annex III. Stakeholder feedback on whether more points should be allocated to this criterion, to account for the cost of undertaking an energy audit, proposed increasing the number of points from the current 1.5 to 3 points.

Feedback received in relation to third party audits was focused mainly on the high investment cost involved. It was mentioned that this optional criteria might not be a realistic option and that almost no applicant has ever chosen the current criterion.

Proposed update

It is proposed to remove this criterion on the basis that its current formulation is not practical and it is felt that the revised proposed mandatory criterion to be ambitious enough.

2.1.7.11 Criterion 41: Air conditioning

Current criterion:

Air conditioning (up to 2 points)

All household air conditioner in the tourist accommodation have an energy efficiency 15% higher than the threshold to qualify for the top class A in Directive 2002/31/EC (1.5 points). All household air conditioners in the tourist accommodation have an energy efficiency 30% or higher than the threshold to qualify for class A in Directive 2002/31/EC (2 points).

This criterion does not apply to appliances that can also use other energy sources, air-to-water and water-to-water appliances, or units with an output (cooling power) greater than 12 kW.

Assessment and verification: The applicant shall provide relevant documentation showing compliance with the criterion.

Regulation:

Directive 2002/31/EC was repealed from 1 January 2013 by Commission Delegated Regulation No 626/2011 of 4 May 2011 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of air conditioners [OJ L 178, 4.5.2011, p.1]. Directive 2010/30/EU introduces energy efficiency classes A+ to A+++.The energy efficiency class must therefore be classified following Annex II of this Regulation.

Feedback:

No stakeholder feedback was received for this criterion.

BEMP:

BEMP specifies that air conditioning systems should be energy efficient, properly maintained and appropriately used.

The current criterion ensures that the system used is efficient. Additional EU Ecolabel criteria are also applicable here: Criterion 23: maintenance and servicing of boilers and air conditioning systems; and Criterion 26: information to guests.

Proposed updates:

An update in line with the revised Regulation 2011/626/EU, supplementing directive 2010/30/EU is required. This results in the following update:

First proposal for revised criterion:**Air conditioning (2 points)**

All household air conditioner in the tourist accommodation have an energy efficiency 15% higher than the threshold to qualify for the *most energy efficient class as laid down in Regulation 2011/626/EU supplementing Directive 2010/30/EU [OJ L 178, 4.5.2011, p.1] with regard to energy labelling of air conditioners or have corresponding energy efficiency.*

This criterion does not apply to air-conditioners that are appliances that can also use other energy sources, or to air-to-water and water-to-water appliances, or to units with an output (cooling power) greater than 12 kW.

Assessment and verification: The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system.

Relevant stakeholder comments and further research after AHWG1

There was no stakeholder feedback for this criterion at or after the first AHWG. It is proposed that no changes are made to the revised criterion. The title has been harmonized with the mandatory criterion.

Current proposal for revised criterion:**Criterion 35: Efficient air conditioning appliances (2 points)**

All household air conditioner in the tourist accommodation have an energy efficiency 15% higher than the threshold to qualify for the *most energy efficient class as laid down in Regulation 2011/626/EU supplementing Directive 2010/30/EU [OJ L 178, 4.5.2011, p.1] with regard to energy labelling of air conditioners or have corresponding energy efficiency.*

This criterion does not apply to air-conditioners that are appliances that can also use other energy sources, or to air-to-water and water-to-water appliances, or to units with an output (cooling power) greater than 12 kW.

Assessment and verification: The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system.

2.1.7.12 **Criterion 42: Automatic switching-off of air conditioning and heating systems**

Current criterion:

Automatic switching-off of air conditioning and heating systems (1.5 points)

There shall be an automatic system that turns off the air conditioning and heating of tourist accommodation when windows are open.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation sale and/or maintenance of the air conditioning system.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Where stakeholder feedback was received, this was not to suggest updates of the technical content, but rather to outline that this can be costly for tourist accommodation. This criterion is not, however, mandatory and so does not need to be updated to reflect this.
2. BEMP has not been updated since the previous revision for TAS and CSS, and as such this criterion is still applicable. Generally, automatic switching off of heating and cooling systems is encouraged as a method of saving energy and maximising the output of these systems.

The criterion shall remain as:

First proposal for revised criterion:

Automatic switching-off of air conditioning and heating systems (1.5 points)

There shall be an automatic system that turns off the air conditioning and heating of the tourist accommodation when windows are open.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation sale and/or maintenance of the air conditioning system.

Relevant stakeholder comments and further research after AHWG1

No stakeholder comments were received for this criterion. However the text has been further specified.

Current proposal for revised criterion:

Criterion 36: Automatic switching-off of air conditioning and heating systems (1.5 points)

95% of the rooms in the tourist accommodation shall have an automatic system that turns off the air conditioning and heating of the when windows are open.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation sale and/or maintenance of the air conditioning system.

2.1.7.13 **Criterion 43: Bioclimatic architecture**

Current criterion:

Bioclimatic architecture (3 points)

Buildings on the tourist accommodation ground shall be built according to bioclimatic architectural principles.

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

Feedback:

Stakeholder feedback was limited, but a number of comments suggested that this criterion needed to be better defined – there was some general confusion around what ‘bioclimatic architectural principles’ included. It was also suggested that this criterion be mandatory for new buildings.

BEMP:

BEMP is to “ensure that new buildings are compliant with the highest achievable energy ratings, as indicated by conformance with PassivHaus and Minergie P standards, and that existing buildings are retrofitted to minimise heating and cooling energy requirements.”

Other updates:

A number of other EU Ecolabel criteria for tourist accommodation relate directly to this criterion, and in some cases there is some overlap. These include:

- Criterion 3: efficiency and heat generation
- Criterion 4: Air conditioning
- Criterion 5: Energy efficiency of buildings
- Criterion 6: Window insulation.

Criterion 40: Energy performance audits for buildings, has also been updated to refer directly to PassiveHouse and Minergie P standards.

Proposed update:

This criterion is not achievable for all organisations (only those which are newly built) and so should be removed. Feedback also suggests there is some confusion about how this can be proved. In addition, a number of existing criteria overlap with Criterion 43: bioclimatic architecture.

It is proposed that this criterion is removed.

Relevant stakeholder comments and further research after AHWG1

Two stakeholder comments were received on the proposal to remove this criterion and were divided in their opinion (see stakeholder comments received during and after the first AHWG in Annex III). Since the criterion remains very difficult to verify, the proposal is to delete the criterion.

2.1.7.14 **Criterion 44: Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumblers and office equipment**

Current criterion:

Energy efficient refrigerators (1 point), ovens (1 point) dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (maximum of 3 points)

(a) (1 point): All household refrigerators shall be of Class A+ or A++ efficiency according to Commission Directive 94/2/EC, and all frigo or mini-bars shall be at least class B efficiency.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the refrigerators and frigo or mini-bars.

(b) (1 point): All household electric ovens shall be of class A energy efficiency as laid down in Directive 2002/40/EC.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the household electric ovens.

Note: The criterion does not apply to ovens not operated with electric energy or otherwise not covered by Commission Directive 2002/40/EC (e.g. industrial ovens).

(c) (1 point): All household dishwashers shall be of class A energy efficiency as laid down in Commission Directive 97/17/EC.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the dishwashers.

Note: The criterion does not apply to dishwashers not covered by Directive 97/17/EC (e.g. industrial dishwashers).

(d) (1 point): All household washing machines shall be of class A energy efficiency as laid down in Commission Directive 95/12/EC (3).

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the washing machines.

Note: The criterion does not apply to washing machines not covered by Directive 95/12/EC (e.g. industrial washing machines).

(e) (1 point): At least 80% of office equipment (PCs, monitors, faxes, printers, scanners, photocopying machines) shall qualify for the energy star as laid down in Regulation (EC) No 106/2008 of the European Parliament and of the Council (4) and in Commission Decision 2003/168/EC (5).

Assessment and verification: The applicant shall provide documentation indicating the qualification for the energy star of the office equipment.

Regulation:

- a) Commission Directive 94/2/EC was repealed in November 2011 by Commission Delegated Regulation (EU) No 1060/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household refrigerating appliances [OJ L 314, 30.11.2010, p.17]. Class thresholds remain unchanged; higher efficiency classes are introduced. Based on the fact that the current criterion stipulates the two highest classes for the award of the optional points, this should be maintained i.e. A+++ and A++
- b) Commission Directive 2002/40/EC is currently in force but will be repealed in January 2015 by Commission Delegated Regulation (EU) No 65/2014 [OJ L 29, 31.1.2014, p.1]. Class thresholds remain unchanged; higher efficiency classes have been introduced. We therefore propose the highest classification under the new Regulation i.e. A+++.

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- c) Commission Directive 97/17/EC was repealed in December 2011 by Commission Delegated Regulation (EU) No 1059/2010 [OJ L 314, 30.11.2010, p.1]. Methodology for the calculation of the Energy Efficiency Index (EEI) and is expressed differently. Therefore cannot compare whether the thresholds have changed, however the current criterion stipulates the highest class, we therefore propose the highest classification under the new Regulation i.e. A+++.
 - d) Commission Decision 95/12/EC was repealed by Commission Delegated Regulation (EU) No 1061/2010 [OJ L 314, 30.11.2010, p. 47]. Methodology for the calculation of the Energy Efficiency Index (EEI) and is expressed differently. Therefore cannot compare whether the thresholds have changed. However the current criterion stipulates the highest class, we therefore propose the highest classification under the new Regulation i.e. A+++.
 - e) No changes in legislation.
 - f) Directive 95/13/EC was repealed in May 2012 by Commission Delegated Regulation (EU) No 392/2012 [OJ L 123, 9.5.2012, p.1]. Methodology for the calculation of the Energy Efficiency Index (EEI) and is expressed differently. Therefore cannot compare whether the thresholds have changed. However the current criterion stipulates the highest class, we therefore propose the highest classification under the new Regulation i.e. A+++.

Feedback:

Stakeholder feedback on this criterion covered two main points:

- Consideration of the new energy efficiency class A+++ for different devices (in line with new regulation, outlined above).
- The possibility of including requirements for industrial appliances.

BEMP:

BEMP outlines that best practice is to *“select efficient cooking equipment, including induction-hob or pot-sensor-controlled gas ovens, efficient refrigeration equipment that uses a natural refrigerant such as ammonia or carbon dioxide, and to control ventilation according to demand.”* The use of recent regulation on energy labelling of appliances ensures that this is the case for EU Ecolabelled tourist accommodation.

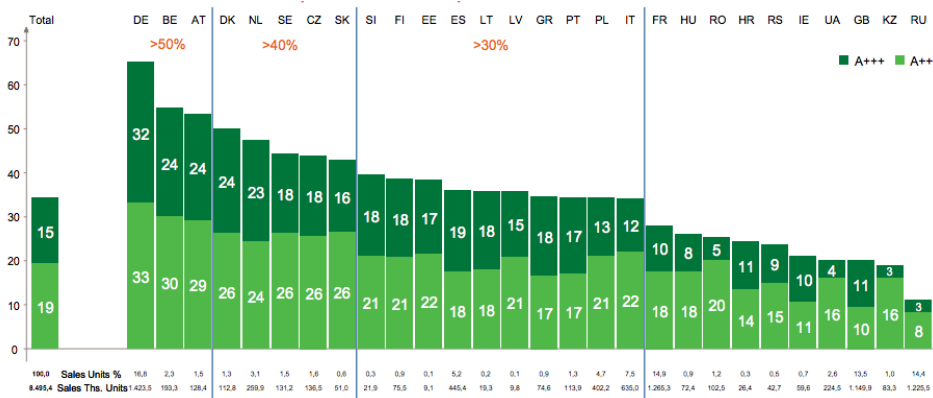
Other updates:

In order to assess the feasibility of changing the Ecolabel criteria requirement to the newly introduced, higher energy efficiency classes it is necessary to evaluate whether these are available on the market. The section below looks at market data over the past years to understand what percentage of the market A++ and A+++ products account for in Europe.

Figure 8 shows the overall market share of household appliances with energy efficiency class A+++ and A++ in European countries. The market share throughout the region is of 15% for the highest energy class and 19% for A++ appliances out of all appliances sold between January and February 2014. This indicates that the recently introduced higher energy classes have had a quick uptake amongst consumers, particularly if taken into account the lower figures of countries such as Russia and Kazakhstan which lie at the bottom of the rankings and are not members of the European Union. In Germany, Belgium and Austria these appliances account for over half of new sales in this period.

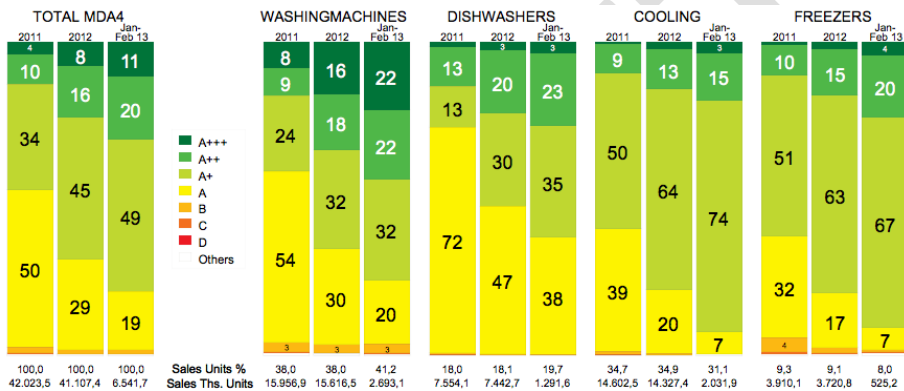
Specific data for large household appliances (washing machines, dishwashers, refrigerators and freezers) show strong variation in market penetration of the most efficient energy classes for different product types. However, strong growth in the market share of the A++ class is experienced for all such appliances (Figure 9).

Figure 8: Sales unit share by energy efficiency class, by country, January to February 2014



Source: GFK (2014)

Figure 9: Sales of appliances in 23 European countries



Source: GFK (2013)

Washing machines exhibit the greatest move towards products with the lowest use of energy. As can be seen, the A+++ energy class already accounted for 8% of new appliances sold in 2011, and reached 22% at the start of 2013 (Figure 9).

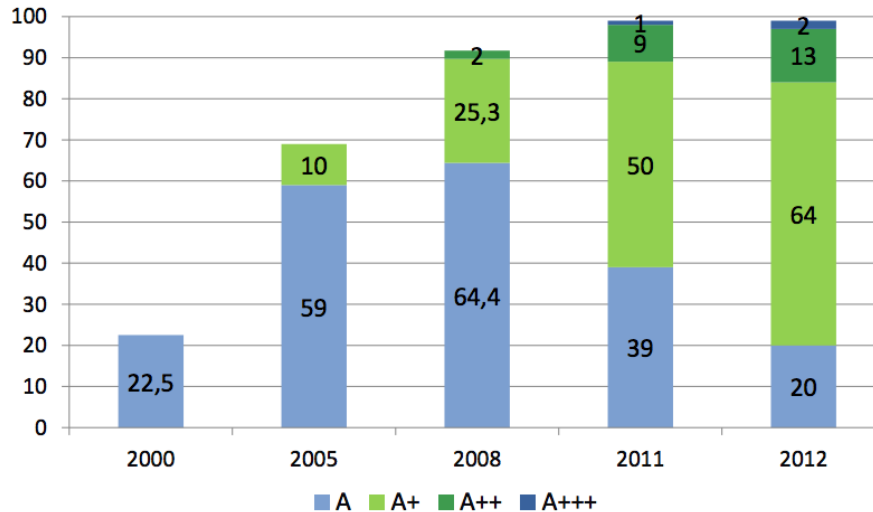
According to topten.eu, a website showing the best appliances in terms of energy efficiency on the European market, all 32 listed washing machines in September 2013 were classed A+++. Out of these, best Energy Efficiency Index (EEI) is 27.1 for a model with 8 kg capacity. This is 40% lower than the A+++ EEI threshold (EEI < 46). In 2011, the best available model exceeded the threshold by 9%. Thus great improvements are being made over short periods of time [Topten.eu, (2013)].

Dishwashers have experienced a lower move towards higher energy efficient products compared to washing machines. Figure 9 shows that sales of class A+++ have grown from 1% to 3% between 2011 and 2012, and remained constant at the beginning of the following year. However, classes A++ and A+ have increased considerably in the same period. The top three classes accounted for 61% of new sales between January and February 2013. Eleven A+++ classed dishwashers were listed on Topten.eu in June 2014, in addition to eight A++ products.

The market share for refrigerators classed A+ increased from 10% in 2005 to 64% in 2012 (Figure 10), whereas the combined market share for A++ and A+++ appliances was 15% in 2012 in EU-15 countries. According to GFK data the market penetration of the top two energy classes reached 18% at the start of 2013 (Figure 9). Freezers experienced larger market penetration, with a combined market share of 24% for A++ and A+++ products. In the

Netherlands and Germany, the market share for refrigerators with A++ and A+++ energy efficiency classes were as high as 40% and 45% of sales respectively [Odyssee-Mure, (2014)]. Topten.eu reports that a large number of A+++ refrigerator models are available on the market. In October 2013, 111 products with the highest efficiency rating were listed on the website [Topten.eu. (2013a)].

Figure 10: Market share of label A to A+++ for refrigerators (EU-15)

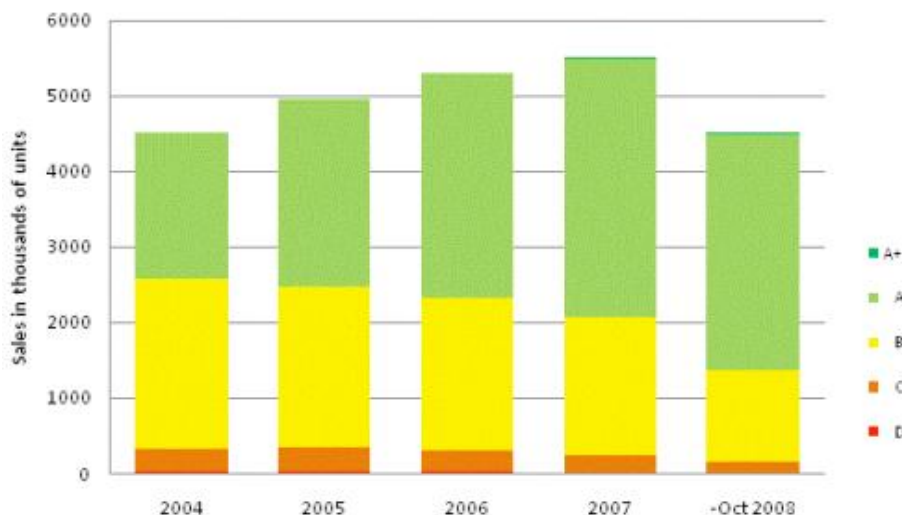


Source: Odyssee-Mure (2014), *Energy Efficiency Trends for households in the EU*. Available at: <http://www.odyssee-mure.eu/publications/efficiency-by-sector/household/household-eu.pdf>

EU wide data for the market share of tumble driers by energy efficiency ratings were not available at the time of writing. According to the Topten in the UK, no tumble driers classed A+++ are available in the UK market. It should be noted that the A++ and A+++ labels were only introduced in 2013. Data shows that 67% of appliances are labelled with a C class and only 1% of the current market is made up by A++ products [Topten Energy Efficiency Guide, (2013)]. According to topten.eu, by the end of 2013 there were 17 different models with class A++ and five that reached class A+++. All of these had a minimum condensation efficiency class B [Topten.eu, (2014)].

Finally, the latest data available for electric ovens dates to 2008. The new Directive introducing A++ and A+++ energy classes will be coming into force in 2015 therefore information on the market penetration of these appliances is not available. Data from then shows that over half the electric ovens and cookers sold were class A (Figure 11). It should be noted that the A+ share shown in this figure is due to a reporting error by a manufacturer [Mtprog, (2009)].

Figure 11: Market share of electric ovens and cookers in 8 European countries



Source: Mtprog for Defra (2009), *Factors influencing the penetration of energy efficient electrical appliances into national markets in Europe*. Available at: <http://www.topten.eu/uploads/File/Factors%20influencing%20the%20penetration%20of%20energy%20efficient%20electrical%20appliances%20into%20national%20markets%20in%20Europe-1.pdf>
 Countries: France, Italy, Germany, Poland, the Netherlands, UK, Portugal and Denmark

Proposed updates:

The only update needed is to consider changes to regulation. This results in the following:

First proposal for revised criterion:

Energy efficient refrigerators (1 point), ovens (1 point) dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (maximum of 3 points)

(a) (1 point): All household refrigerators shall be of Class A+ or A++ efficiency according to Commission Delegated Regulation (EU) No 1060/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the refrigerators and frigo or mini-bars.

(b) (1 point): All household electric ovens shall be of class A+++ energy efficiency as laid down in Commission Delegated Regulation (EU) No 65/2014.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the household electric ovens.

Note: The criterion does not apply to ovens not operated with electric energy or otherwise not covered by Commission Delegated Regulation (EU) No 65/2014 (e.g. industrial ovens).

(c) (1 point): All household dishwashers shall be of class A+++ energy efficiency as laid down in Commission Delegated Regulation (EU) No 1059/2010.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the dishwashers.

Note: The criterion does not apply to dishwashers not covered by Commission Delegated Regulation (EU) No 1059/2010 (e.g. industrial dishwashers).

(d) (1 point): All household washing machines shall be of class A+++ energy efficiency as laid down in Commission Delegated Regulation (EU) No 1061/2010)

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the washing machines.

Note: The criterion does not apply to washing machines not covered by Commission Delegated Regulation (EU) No 1061/2010 (e.g. industrial washing machines).

(e) (1 point): At least 80% of office equipment (PCs, monitors, faxes, printers, scanners, photocopying machines) shall qualify for the energy star as laid down in Regulation (EC) No 106/2008 of the European Parliament and of the Council (4) and in Commission Decision 2003/168/EC (5).

Assessment and verification: The applicant shall provide documentation indicating the qualification for the energy star of the office equipment.

(f) (1 point): All electric tumble driers shall be class **A+++** energy efficiency as laid down in Commission Delegated Regulation (EU) No 392/2012.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all electric tumble driers.

Note: The criterion does not apply to electric tumble driers not covered by Commission Delegated Regulation (EU) No 392/2012 (e.g. industrial tumble driers).

Relevant stakeholder comments and further research after AHWG1

Several stakeholders raised concern about the cost of replacing all existing equipment and the high level of stringency of the revised criterion. Furthermore there is an issue on the production of waste from equipment that is disposed of before reaching its end of life. It was suggested by several stakeholders to require **A+++** energy efficiency class for equipment that is acquired and keep the current criterion requirement for the existing equipment. However, since it is an optional criterion points must be awarded at the moment of application and not during the licence period.

The environmental program Tripadvisor Greenleaders [Tripadvisor Greenleaders (2013)], awards points for each EU Energy Label rated Class A or better or ENERGY STAR qualified appliance that is found in at least 90% of guest rooms.

Proposed update

It is proposed that the revised proposal is maintained but the required energy class is lowered to **A++**, as requested by several stakeholders. This requirement is more ambitious than current criterion (Class A for most appliances) but allows some flexibility by requesting that 90% of household appliances must comply instead of all household appliances. This partially aligns the criterion to Greenleaders to avoid producing unnecessary waste.

As several criteria have been removed in order to simplify the criteria set, it is proposed that some points are reallocated to other criteria to maintain the scoring rules of the points system. It is therefore suggested to include extra points in this criterion as this is an environmental hot spot highlighted by BEMP.

Current proposal for revised criterion:

Criterion 37: Energy efficient refrigerators (1 point), ovens (1 point) dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (maximum of 4 points)

(a) (1 point): At least 90% of household refrigerators shall be of EU Energy Label rated Class A++ or better according to Commission Delegated Regulation (EU) No 1060/2010 of 28

September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council. (Or equivalent energy efficiency for Non EU applicants)

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the refrigerators and frigo or mini-bars.

(b) (1 point): At least 90% of household electric ovens shall be of EU Energy Label rated Class A++ or better as laid down in Commission Delegated Regulation (EU) No 65/2014. (Or equivalent energy efficiency for Non EU applicants)

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the household electric ovens.

Note: The criterion does not apply to ovens not operated with electric energy or otherwise not covered by Commission Delegated Regulation (EU) No 65/2014 (e.g. industrial ovens).

(c) (1 point): At least 90% of household dishwashers shall be of EU Energy Label rated Class A++ or better as laid down in Commission Delegated Regulation (EU) No 1059/2010. (Or equivalent energy efficiency for Non EU applicants)

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the dishwashers.

Note: The criterion does not apply to dishwashers not covered by Commission Delegated Regulation (EU) No 1059/2010 (e.g. industrial dishwashers).

(d) (1 point): At least 90% of household washing machines shall be of EU Energy Label rated Class A++ or better as laid down in Commission Delegated Regulation (EU) No 1061/2010. (Or equivalent energy efficiency for Non EU applicants)

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the washing machines.

Note: The criterion does not apply to washing machines not covered by Commission Delegated Regulation (EU) No 1061/2010 (e.g. industrial washing machines).

(e) (1 point): At least 90% of office equipment (PCs, monitors, faxes, printers, scanners, photocopying machines) shall be ENERGY STAR qualified as laid down in Regulation (EC) No 106/2008 of the European Parliament and of the Council and in Commission Decision 2003/168/EC. (Or equivalent energy efficiency for Non EU applicants)

Assessment and verification: The applicant shall provide documentation indicating the qualification for the energy star of the office equipment.

(f) (1 point): At least 90% of household electric tumble driers shall be offer Energy Label rated Class A++ or better as laid down in Commission Delegated Regulation (EU) No 392/2012. (Or equivalent energy efficiency for Non EU applicants)

Assessment and verification: The applicant shall provide documentation indicating the energy class of all electric tumble driers.

Note: The criterion does not apply to electric tumble driers not covered by Commission Delegated Regulation (EU) No 392/2012 (e.g. industrial tumble driers).

2.1.7.15 **Criterion 45: Electric hand and hair driers with proximity sensor**

Current criterion:

Electric hand and hair driers with proximity sensor (up to 2 points)

All electric hand (1 point) and hair (1 point) driers shall be fitted with proximity sensors or have been awarded an ISO Type I eco-label.

Assessment and verification: The applicant shall provide appropriate supporting documentation of how the tourist accommodation fulfils this criterion.

Feedback:

Stakeholder feedback suggests that hairdryers are more commonly fitted with 'push buttons' than proximity sensors, which makes this criterion difficult to achieve.

BEMP:

There is no BEMP specifically for hand and hair dryers – the environmental impact of these may not be significant in a large hotel. However, the use of proximity sensors can be assumed to be preferable to push button driers – once these are pressed they will run according to a timer, regardless of whether anyone is drying their hands.

Proposed update:

It is suggested that hair dryers are removed from this criterion, as they do not typically operate via proximity sensor. The updated criterion is as follows:

First proposal for revised criterion:**Electric hand driers with proximity sensor (1 point)**

All electric hand driers shall be fitted with proximity sensors, or have been awarded an ISO Type I eco-label.

Assessment and verification: The applicant shall provide appropriate supporting documentation of how the tourist accommodation fulfils this criterion.

Relevant stakeholder comments and further research after AHWG1

Limited stakeholder feedback was received regarding this criterion.

Proposed update:

With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement.

2.1.7.16 Criterion 46: Refrigerator positioning**Current criterion:****Refrigerator positioning (1 point)**

The kitchen, kiosk and shop refrigerator(s) shall be positioned and regulated according to energy saving principles, in order to reduce energy waste.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion.

Feedback:

No stakeholder feedback was received regarding this criterion.

BEMP:

There is no specific BEMP guidance for refrigerator positioning, only general information on the preference for energy efficient equipment and its maintenance. However, the current User Manual for TAS and CSS specifies that to meet this criterion:

“At least two of the following energy saving principles shall be respected:

- 1. the refrigerator is far from or shielded from sources of heat, such as the oven;*
- 2. the cooling tubes of the refrigerator are well cleaned on a regular basis;*
- 3. there are precise procedures to open the refrigerator as few times as possible.”*

Proposed updates:

To avoid confusion, it is suggested that the information in the current User Manual for TAS and CSS is included directly in the criterion. This results in the following change:

First proposal for revised criterion:

Refrigerator positioning (1 point)

The kitchen, kiosk and shop refrigerator(s) shall be positioned and regulated according to energy saving principles, in order to reduce energy waste.

At least two of the following energy saving principles shall be respected:

1. the refrigerator is far from or shielded from sources of heat, such as the oven;
2. the cooling tubes of the refrigerator are well cleaned on a regular basis;
3. there are precise procedures to open the refrigerator as few times as possible.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, including which actions are followed.

Relevant stakeholder comments and further research after AHWG1

Stakeholder feedback during and after the first AHWG meeting reinforced the need to either simplify or delete this criterion (see stakeholder comments in Annex III).

Proposed update:

With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that this criterion is removed on the basis of its low environmental benefit and there being no specific BEMP guidance for refrigerator positioning.

2.1.7.17 **Criterion 47: Automatic switching off lights in tourist accommodation**

Current criterion:

Automatic switching off lights in tourist accommodation (1.5 points)

Automatic systems, which turn the lights off when guests leave the room, shall be installed in 95% of the tourist accommodation.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Very little stakeholder feedback was provided about this criterion. Some comments did suggest that this criterion should be made mandatory, however it

is suggested that this may impose too big a burden on tourist accommodation. This criterion is also supported by Criterion 8: Switching off lights.

2. The BEMP has not been updated since the previous revision for TAS and CSS, and as such this criterion is still applicable. Best practice is “for all rooms and corridor areas to have intelligent lighting control. For small enterprises where automatic lighting control in rooms may not be practical, the best practice is to install appropriately positioned signs reminding guests to switch off lights (as required in EU Flower criteria for accommodation: EC, 2009).” Reference to the EU Ecolabel in this case shows that this criterion does not need updating.

The criterion shall remain as:

First proposal for revised criterion:

Automatic switching off lights in tourist accommodation (1.5 points)

Automatic systems, which turn the lights off when guests leave the room, shall be installed in 95% of the tourist accommodation.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems.

Relevant stakeholder comments and further research after AHWG1

A stakeholder suggested that the criterion should specify that air conditioners (as well as lights) should be turned off automatically when guests leave a room (see stakeholder comments received during and after the first AHWG in Annex III). No comments were received from stakeholders regarding adjusting the allocation of points, which will therefore remain 1.5 points.

Proposed update:

The proposal is to add air conditioners to the criterion (see below).

Current proposal for revised criterion:

Criterion 38: Automatic switching off lights and household air conditioners in tourist accommodation (1.5 points)

Automatic systems, which turn the lights and household air conditioners off when guests leave the room, shall be installed in 95% of the tourist accommodation.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems.

2.1.7.18 Criterion 48: Sauna timer control

Current criterion:

Sauna timer control (1 point)

All sauna units and hammams shall have a timer control or a staff procedure regulating the switching on/off.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Little feedback was received for this criterion, and no suggestions for updates were proposed.
2. The BEMP for the use of saunas has not been updated – the impact of this is likely to be small compared to other activities in a tourist accommodation sites. Nevertheless, timer controls are generally considered practical so as not to waste energy when the equipment is not being used.

The criterion shall remain as:

First proposal for revised criterion:

Sauna timer control (1 point)

All sauna units and hammams shall have a timer control or a staff procedure regulating the switching on/off.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems.

Relevant stakeholder comments and further research after AHWG1

A stakeholder questioned the effectiveness of having a ‘staff procedure’ to regulate the switching on/off of all saunas and hammams (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update:

With the aim being to simplify the criteria set and to focus on environmental hot spots, it is suggested that this criterion is removed as impact of this is likely to be small compared to other activities in a tourist accommodation sites and there being no specific BEMP guidance sauna timer control.

2.1.7.19 **Criterion 49: Swimming pool heating with renewable energy sources**

Current criterion:

Swimming pool heating with renewable energy sources (up to 1.5 points)

Energy used to heat swimming pool water shall come from renewable energy sources. At least 50%: 1 point, 100%: 1.5 points.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on the energy consumed in heating swimming pool water and documentation showing the amount of energy used that comes from renewable energy sources.

This criterion requires no significant updating. This is based on the following:

1. Very little stakeholder feedback was provided on this criterion; although there was one suggestion that it could be mandatory for all new swimming pools to fulfil this criterion. This may not, however, be feasible for all types of tourist accommodation within the scope of the EU Ecolabel criterion.
2. The BEMP for swimming pool heating has not been updated – in general heating from renewable energy sources is required. For clarity, the assessment and

verification section should be updated to set out the definition of renewable energy sources.

The criterion is proposed as:

First proposal for revised criterion:

Swimming pool heating with renewable energy sources (up to 1.5 points)

Energy used to heat swimming pool water shall come from renewable energy sources. At least 50%: 1 point, 100%: 1.5 points.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on the energy consumed in heating swimming pool water and documentation showing the amount of energy used that comes from renewable energy sources. Renewable energy sources are defined as renewable, non-fossil energy sources (wind, solar, geothermal wave, tidal, hydro power, biomass, landfill gas, sewage treatment plant gas and biogases) – this is in accordance with is Directive 2001/77/EC.

Relevant stakeholder comments and further research after AHWG1

Two stakeholder comments were received for this criterion: one stakeholder questioned whether the heating of outdoor swimming pools should be allowed at all; a second stakeholder suggested lowering the 100% threshold (of energy used to heat swimming pools that comes from renewable sources for the award of 1.5 points) to 95% (see stakeholder comments received during and after the first AHWG in Annex III). The stakeholder mentioned that the heat pumps used in combination with solar systems sometimes have technical problems. They mentioned that this issue may be relevant for many stakeholders using these systems.

Proposed update:

It is proposed to lower the threshold at 95% according to stakeholder request. This is not substantial change and may cover possible feasibility problems. Additionally it is proposed to specify that it should be on-site generation of heat to avoid that the purchased electricity from renewable energy source is used for this purpose trough electric pumps pool heaters.

Current proposal for revised criterion:

Criterion 39: Swimming pool heating with on-site renewable energy sources (up to 1.5 points)

Energy used to heat swimming pool water shall come from on-site renewable energy sources. At least 50%: 1 point, 95%: 1.5 points.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on the energy consumed in heating swimming pool water and documentation showing the amount of energy used that comes from renewable energy sources. Renewable energy sources are defined as renewable, non-fossil energy sources (wind, solar, geothermal wave, tidal, hydro power, biomass, landfill gas, sewage treatment plant gas and biogases) – this is in accordance with is Directive 2001/77/EC.

2.1.7.20

Criterion 50: Automatic switching off outside lights

Current criterion:

Automatic switching off outside lights (1.5 points)

Outside lighting not needed for security reasons shall be turned off automatically after a defined time, or be activated through a proximity sensor.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems.

Feedback:

There was very little feedback on this criterion; however, it was suggested by EU Ecolabel assessors for TAS that often outside lights may not be well maintained. This can result in timers or sensor systems being installed that may not work effectively. To mitigate this, it is important that some maintenance is carried out.

BEMP:

BEMP for outside lighting includes:

- To install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural-light and time.
- Minimise light pollution arising from outdoor lighting (e.g. through use of correctly-angled low-pressure sodium lamps).

Proposed updates:

Although no significant updates are required for this criterion, feedback from EU Ecolabel assessors suggests that these lighting systems may not always be well maintained. Maintenance should therefore be specified as a requirement, to ensure automatic times or sensors are working effectively.

The following is therefore proposed:

First proposal for revised criterion:

Automatic switching off outside lights (1.5 points)

Outside lighting not needed for security reasons shall be turned off automatically after a defined time, or be activated through a proximity sensor. Regular maintenance of outside lighting shall be undertaken.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems, along with a maintenance log or other record of maintenance.

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received on either changing the allocation of points or improving the definition of 'regular maintenance' (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update

No updates to the revised criterion are proposed. (Criterion 40)

2.1.8 Optional criteria related to water

2.1.8.1 Criterion 51: Use of rainwater and recycled water

Current criterion:

Use of rainwater (2 points) and recycled water (2 points)

(a) (2 points): Rainwater shall be collected and used for non-sanitary and non-drinking purposes.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation, and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.

(b) (2 points): Recycled water shall be collected and used for non-sanitary and non-drinking purposes.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.

Feedback:

Limited feedback was received for this criterion, although there were a few suggestions that the use of rainwater could be made mandatory – even if this is only limited.

BEMP:

BEMP for the use of rain and recycled water is to “install a grey water recovery system that recovers grey water for use in indoor processes (e.g. toilet flushing) following treatment or exterior processes (e.g. irrigation), or a rainwater collection system that uses rainwater for indoor purposes.”

Although the BEMP specifies the use of rainwater and recycled water, much like the EU Ecolabel criterion, it makes a distinction between the use of this water for indoor and exterior processes. This is not reflected in the current EU Ecolabel criterion.

Proposed update:

It is suggested that this criterion should be rationalised to take into account the different systems needed for ‘indoor’ and ‘exterior’ use of recycled water. The criterion would then recognise the relative high investment required to introduced a system for rain/recycled water use for internal use, as opposed to external use. Due to the high investment required, it is likely that a number of tourist accommodation sites may not initially be able to achieve this criterion – making this mandatory would therefore not be practical.

The following is therefore proposed:

First proposal for revised criterion:

Use of rainwater and recycled water (up to 3 points)

(a) (1 point): Rainwater or recycled water shall be collected and used for non-sanitary and non-drinking purposes in the external areas of the tourist accommodation (for example watering the garden or car washing).

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation, and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.

(b) (2 points): Rainwater or recycled water shall be collected and used for non-sanitary and

non-drinking purposes in the internal areas of the tourist accommodation (e.g. to flush toilets).

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.

Relevant stakeholder comments and further research after AHWG1

Limited stakeholder feedback was received for this criterion and no stakeholder comments were received for changing the current allocation of points. A stakeholder requested that more information is provided on what constitutes recycled water as this may vary outside the EU (see stakeholder comments received during and after the first AHWG in Annex III).

The environmental program, Tripadvisor Greenleaders [Tripadvisor Greenleaders (2013)], awards points where alternative water is used in non-potable applications such as landscaping, flushing toilets, and fire suppression systems in the accommodation service.

Alternative water sources are defined by Tripadvisor Greenleaders as the following:

Reclaimed water, also known as grey water, is recycled waste water generated from laundry, showers, and lavatory sinks that is treated and reused. Greywater is captured separately from black water (water from toilets and kitchen sinks) and treated on-site instead of being sent to a municipal combined sewage treatment facility. Generally, on-site Grey water treatment is fairly minimal and does NOT result in potable (drinkable) water. To prevent consumption, treated grey water is often dyed and signage may be placed in restrooms.

Rainwater can be captured via rooftop and underground systems which channel the water into a cistern for later use.

Condensate is generated as a byproduct of HVAC systems when cooling air or water.

Proposed update:

These sources help conserve water, lower energy usage from water treatment facilities, and reduce stress on sewage. It is proposed to align the proposed criteria to Tripadvisor Greenleaders to allow more comprehensive criteria which cover other types of alternative water source.

The title and criteria have been modified to reflect the alignment. Definitions of the alternative water sources will be included in the User Manual. In the assessment and verification section, appropriate further documentation has been specified by requesting photographs showing alternative water distribution systems.

Current proposal for revised criterion:

Criterion 41: Use of alternative water sources (up to 4 points)

The accommodation shall use the following alternative water sources for non-sanitary and non-drinking purposes in the accommodation facility, up to a maximum of 3 points.

-Reclaimed water or grey water from laundry (1 point), showers (1 point), and lavatory sinks(1 point)

-Rainwater via rooftop (1 point)

-Condensate from HVAC systems. (1 point)

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with photographs showing alternative

water distribution systems, and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.

2.1.8.2 **Criterion 52: Automatic watering systems for outside areas**

Current criterion:

Automatic watering systems for outside areas (1.5 points)

The tourist accommodation shall use an automatic system which optimises watering times and water consumption for outside plants/ greening.

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

Feedback:

Several stakeholders suggested that this criterion should be updated to award points where gardens are not watered. In addition, it was suggested that an automatic watering system can use more water than a manual system which relies on one trained person and a specific process.

BEMP:

The BEMP does not specify that automatic watering systems are preferred (as does the EU Ecolabel criterion), but instead specifies that water consumption for irrigation should be minimised in general:

“minimise water consumption for irrigation and light pollution arising from outdoor lighting (e.g. through use of correctly-angled low-pressure sodium lamps).”

Other updates:

It is suggested that both BEMP and the stakeholder feedback is considered in updating this criterion. Importantly, this criterion is focused on minimising water consumption for irrigation and should therefore allow tourist accommodation to establish a best practice system. This may be, for example, to not water the garden at all. The following change to the criterion is therefore proposed:

First proposal for revised criterion:

Watering systems for outside areas (1.5 points)

The tourist accommodation shall have a documented procedure for watering outside areas/plants, including details on how watering times have been optimised and water consumption minimised. This may, for example, include no watering of outside areas.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation including details of the documented system/procedure for watering.

Relevant stakeholder comments and further research after AHWG1

Limited stakeholder feedback was received regarding this criterion. A stakeholder suggested that changing the criterion to requiring a documented system/procedure for watering outside areas would constitute changing the criterion from a ‘performance’ criterion to a ‘management’ criterion which would make it difficult to verify (see stakeholder comments received during and after the first AHWG in Annex III). Another stakeholder mentioned that trained staff could be even more efficient than automatic systems.

Proposed update:

It is suggested that the criterion allows the two systems, automatic and trained staff. It is also proposed that this criterion is rationalised to take into account the different systems. The criterion would then recognise the relative high investment required to introduce an automatic system. The title has been modified in order to reflect that automatic and efficient irrigation by staff are addressed.

Current proposal for revised criterion:**Criterion 42: Efficient irrigation (up to 1.5 points)**

The tourist accommodation shall have a documented procedure for watering outside areas/plants, including details on how watering times have been optimised and water consumption minimised. This may, for example, include no watering of outside areas. (1 point)

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation including details of the documented system/procedure for watering.

OR

The tourist accommodation shall use an automatic system which optimises watering times and water consumption for outside areas/plants. (1.5 points)

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

2.1.8.3 Criterion 53: Water flow from taps and shower heads**Current criterion:****Water flow from taps and shower heads (1.5 points)**

The average flow from all taps and shower heads excluding bath taps and filling stations shall not exceed 8 litres/minute.

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

Feedback:

Only two comments were received on this criterion, although they both suggested some confusion in identifying the difference between this criterion and Criterion 11: Water flow from taps and showers.

BEMP: is to control water flow to minimise overall water use.

Proposed update:

It should be made clear that this criterion relates to mandatory Criterion 11: Water flow from taps and showers. Criterion 53 awards points for those tourist accommodation sites which go above the limits laid out in the mandatory criterion. To align with this mandatory criterion, it is proposed that the water flow rate is reduced to 5 litres/minute for taps (up to 6 litres/minute is permitted as a maximum for the mandatory criteria). A flow below 8 litres/minute for showers has been found to be difficult to achieve from the technical point of view.

The following criterion is proposed:

First proposal for revised criterion:

Water flow from taps and shower heads (1.5 points)

The average flow from all taps and filling stations (excluding bath taps) shall not exceed 5 litres/minute.

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

Relevant stakeholder comments and further research after AHWG1

A stakeholder suggested that lowering the average flow limit from all taps and filling stations (excluding bath taps) from 8 litres/minute to 5 litres/minute could compromise customer experience and be difficult to achieve over many floors of a tourist accommodation or at a campsite (see stakeholder comments received during and after the first AHWG in Annex III). No feedback was received on adjusting the allocation of points.

Proposed update

The proposal is to compromise by adjusting the limit to 6 litres/minute, which is the limit allowed for EU Ecolabel sanitary tapware. The criterion goes beyond the mandatory criterion, as kitchen taps are not excluded from meeting the requirement of maximum flow in this optional criterion. Additionally, a requirement on labelled taps and shower heads has been proposed. The assessment and verification text has been further specified and the use of the EU Ecolabel certification is suggested to be used as a means of verification.

Current proposal for revised criterion:

Criterion 43: Water flow from taps and shower heads (up to 3 points)

The average flow from all taps and filling stations (excluding bath taps) shall not exceed 6 litres/minute. (1.5 point)

At least 50% of taps and shower heads shall have been awarded the EU Ecolabel in accordance with Commission Decision of 21 May 2013 establishing the criteria for the award of the EU Ecolabel for sanitary tapware (2013/250/EU) (1.5 point)

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation. Where EU Ecolabel sanitary tapware products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2013/250/EU.

2.1.8.4 **Criterion 54: WC flushing**

Current criterion:

WC flushing (1.5 points)

At least 95% of WCs shall consume 6 litres per full flush or less.

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

Feedback:

The use of dual flush toilets is now very common, but a number of respondents were unsure whether these types of WCs are applicable for this criterion. There was also some confusion as to how the flush volume of the WC could be measured.

BEMP:

Best practice for WC flushing is to “minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs”.

Again, the use of dual flush WCs is outlined and so should be considered for inclusion in the EU Ecolabel criterion.

Other updates:

The criterion should also be updated to accord with the minimum EU Ecolabel requirements for WCs. More information on this can be found in section 2.9.3 of Preliminary Report.

Proposed update:

It is proposed that this criterion be updated to refer to the EU Ecolabel requirements for WCs. The WC criterion also includes a methodology for calculation which takes into account dual flush (see update of assessment and verification section below).

First proposal for revised criterion:

WC flushing (1.5 points)

At least 95% of WCs shall consume a maximum average of 3.5 litres per full flush if using a water saving device or a maximum of 4.0 litres per full flush. Dual flush WCs are within the scope of this criterion

Assessment & Verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion together with appropriate supporting documentation. The calculation shall be in accordance with Appendix 1 of Commission Decision of 7 November 2013 EU Ecolabel for flushing toilets and urinals.

Relevant stakeholder comments and further research after AHWG1

Stakeholder feedback that was received for this criterion indicated that the proposed limit of ‘a maximum average of 3.5 litres per full flush if using a water saving device or a maximum of 4.0 litres per full flush’ was too stringent, it is proposed that the criterion remains as it was before at 6 litres/flush (see stakeholder comments received during and after the first AHWG in Annex III). No feedback was received on adjusting the allocation of points.

Proposed update

The proposal is therefore to restore the criterion to its original text with a limit of 6 litres per full flush or less which is a relaxed value. However the potential saving of water that could be achieved regarding the number of WCs on the accommodation it is suggested to make this criterion mandatory. It is proposed to merged with criterion on *urinals flushing* (See section 2.1.2.3)

Current criterion:**Dishwasher water consumption (1 point)**

The water consumption of the dishwashers (expressed as W (measured)) shall be lower or equal to the threshold as defined in the equation below using the same test method EN 50242 and programme cycle as chosen for Directive 97/17/EC:

$$W \text{ (measured)} \leq (0.625 \times S) + 9.25$$

where:

W (measured) = the measured water consumption of the dishwasher in litres per cycle, expressed to the first decimal,

S = the applicable number of standard place settings of the dishwasher. The criterion only applies to household dishwashers.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the dishwashers or evidence that the dishwashers have been awarded the Community eco-label.

Regulation:

Directive 97/17/EC was repealed in December 2011 by Commission Delegated Regulation (EU) No 1059/2010 [OJ L 314, 30.11.2010, p.1]. The current criterion needs to be updated to reflect this.

Feedback:

Limited feedback was received on this criterion. There were, however, a number of comments suggesting that this criterion could be made more applicable for commercial appliances.

BEMP:

Selection of an appropriate size and type of efficient dishwasher with low water consumption is best practice. This is in line with the current EU Ecolabel criterion for dishwasher use.

Other updates:

There is no longer an EU Ecolabel product group entitled “Dishwashers”. The assessment and verification section needs to be amended to reflect this.

Proposed update:

Reference to Directive 97/17/EC should be removed, as this directive has been updated. In addition, reference to the EU Ecolabel for dishwashers should be removed.

First proposal for revised criterion:**Dishwasher water consumption (1 point)**

The annual water consumption (AWC) of the dishwashers, expressed in litres per year, shall be lower or equal to the threshold as defined in the equation below:

$$AWC \text{ (measured)} \leq (0.625 \times S) + 9.25$$

where:

AWC (measured) = the measured annual water consumption of the dishwasher in litres.

S = the applicable number of standard place settings of the dishwasher. The criterion only applies to household dishwashers covered by Commission Delegated Regulation (EU) No 1059/2010

Assessment and verification: The applicant shall provide the annual water consumption of the Dishwasher calculated according to Point 3 of Annex VII of Commission Delegated Regulation (EU) No 1059/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household dishwashers i.e. the annual water consumption (AWC) of a household dishwasher is calculated, in litres and rounded up to the nearest integer, as:

$$AWC = Wt \times 280$$

where:

Wt = water consumption for the standard cleaning cycle, in litres and rounded to one decimal place

Relevant stakeholder comments and further research after AHWG1

Limited feedback was received for this criterion (see stakeholder comments received during and after the first AHWG in Annex III). A stakeholder suggested deleting the reference to annual water consumption and to refer instead to the water consumption of a standard cycle, as it was in the original criterion (before the revised criterion above). No feedback was received on adjusting the allocation of points.

At the time Regulation Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for household dishwashers was implemented, the best available technology on the market for household dishwashers in terms of their water was the following:

Table 13. Water consumption of best available technology on the market for household dishwashers at the time of entry into force of COMMISSION REGULATION (EU) No 1016/2010

Product sub-group	water consumption: [litres/cycle]
Household dishwashers with 15 place settings	10
Household dishwashers with 14 place settings	10
Household dishwashers with 13 place settings	10
Household dishwashers with 12 place settings	9
Household dishwashers with 9 place settings	9
Household dishwashers with 6 place settings	7
Household dishwashers with 4 place settings	9.5

Source: COMMISSION REGULATION (EU) No 1016/2010

Proposed update

Following stakeholder feedback, it is proposed to clarify the criterion by deleting reference to 'annual' in the calculation of water consumption and to align the requirement to the benchmarks identified in Regulation Directive 2009/125/EC.

As several criteria have been removed in order to simplify the criteria set, some points should be reallocated to other criteria in order to keep the scoring rules of the points system. It is

therefore proposed that extra points are allocated to this criterion, since it is best practice identified in BEMP.

Current proposal for revised criterion:

Criterion 44: Dishwasher water consumption (2 points)

The water consumption of the dishwashers shall be lower or equal to the threshold as defined in the following table:

<u>Product sub-group</u>	<u>Water consumption (Wt) [litres/cycle]</u>
Household dishwashers with 15 place settings	10
Household dishwashers with 14 place settings	10
Household dishwashers with 13 place settings	10
Household dishwashers with 12 place settings	9
Household dishwashers with 9 place settings	9
Household dishwashers with 6 place settings	7
Household dishwashers with 4 place settings	9.5

Where:

Wt = Water consumption for the standard cleaning cycle, in litres and rounded to one decimal place.

The criterion only applies to household dishwashers covered by the Commission Delegated Regulation (EU) No 1061/2010 with regard to ecodesign requirements for household dishwashers.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the dishwashers.

2.1.8.6 Criterion 56: Washing machine water consumption

Current criterion:

Washing machine water consumption (1 point)

The washing machines used within the tourist accommodation by guests and staff or those used by the tourist accommodation laundry service provider shall use no more than 12 litres of water per kg of wash-load measured according to EN 60456, using the same standard 60 °C cotton cycle as chosen for Directive 95/12/EC.

Assessment and verification: The applicant shall provide the annual water consumption of the washing machine calculated according to the technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the washing machines or evidence that the washing machines have been awarded the Community eco-label. The

tourist accommodation management shall provide technical documentation from its laundry service provider that their washing machine complies with the criterion.

Regulation:

Commission Decision 95/12/EC was repealed by Commission Delegated Regulation (EU) No 1061/2010 [OJ L 314, 30.11.2010, p. 47]. The current criterion needs to be updated to reflect this.

Feedback:

The only comment received regarding this criterion, suggested that the use of commercial appliances should be considered.

BEMP:

Procurement of efficient washing machines is encouraged to reduce both energy and water use. This is in line with the current EU Ecolabel criterion for washing machine use.

Other updates:

There is no longer an EU Ecolabel product group entitled “Washing Machines”. The assessment and verification section needs to be amended to reflect this.

Proposed update:

Reference to Commission Decision 95/12/EC should be removed, as this has been updated. In addition, reference to the EU Ecolabel for washing machines should be removed.

First proposal for revised criterion:

Washing machine water consumption (1 point)

The washing machines used within the tourist accommodation by guests and staff or those used by the tourist accommodation laundry service provider shall use no more than 12 litres of water per kg of wash-load measured according to EN 60456, using the same standard 60 °C cotton cycle as chosen for Commission Delegated Regulation (EU) No 1061/2010.

This criterion only applies to household washing machines covered by Commission Delegated Regulation (EU) No 1061/2010.

Assessment and verification: The applicant shall provide a technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the washing machines. The tourist accommodation management shall provide technical documentation from its laundry service provider that their washing machine complies with the criterion.

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received for this criterion.

At the time 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 was implemented, the best available technology on the market for household washing machines, in terms of their water and energy consumptions, washing efficiency and airborne acoustical noise emissions during washing/spinning for the standard 60 °C cotton programme at full load, was the following:

Table 14 Water consumption of best available technology on the market for household washing machines at the time of entry into force of COMMISSION REGULATION (EU) No 1015/2010

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

Source: COMMISSION REGULATION (EU) No 1015/2010

Proposed update:

It proposed to align the water consumption thresholds to the benchmarks the calculation of water consumption and to align the requirement to the benchmarks identified at the time 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 was implemented.

As several criteria have been removed in order to simplify the criteria set, some points should be reallocated in other criteria in order to keep the scoring rules of the points system. It is proposed that extra points are allocated to this criterion, as this is best practice identified in BEMP.

Current proposal for revised criterion:

Criterion 45: Washing machine water consumption (2 points)

The water consumption of the washing machines used within the tourist accommodation by guests and staff or those used by the tourist accommodation laundry service provider shall be lower or equal to the threshold as defined in the following table:

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

[The criterion only applies to household washing machines covered by the Commission Delegated Regulation \(EU\) No 1015/2010 with regard to ecodesign requirements for household dishwashers.](#)

[Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the washing machines.](#)

2.1.8.7 **Criterion 57: Tap water temperature and flow**

Current criterion:

Tap water temperature and flow (1 point)

At least 95% of taps shall allow a precise and prompt regulation of the water temperature and of the water flow.

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

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received regarding updates to this criterion.
2. BEMP outlines the benefits of tap flow and temperature regulation: Thermostatic mixers maintain a specific water temperature, adjusting for flow and pressure variations, according to calibrated settings. They enable precise and rapid temperature control at different flow rates, allowing water flows to be stopped and restarted quickly – e.g. to apply shampoo - this minimising water and energy use.

This is already reflected in the EU Ecolabel criterion and so no update is required.

The criterion shall remain as:

First proposal for revised criterion:

Tap water temperature and flow (1 point)

At least 95% of taps shall allow a precise and prompt regulation of the water temperature and of the water flow.

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

Relevant stakeholder comments and further research after AHWG1

Two stakeholder comments were received and requested clarification on the wording of the criterion (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update:

With the aim to simplify the criteria set this criterion is proposed to be removed as these devices are addressed in the proposed optional criterion *Water flow from taps and shower heads* which is considered to be comprehensive.

2.1.8.8 **Criterion 58: Shower timers**

Current criterion:

Shower timers (1.5 points)

All showers in sanitary facilities/common areas shall have a timing/proximity device which interrupts water flow after a defined time or if not in use.

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

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Very little stakeholder feedback was received regarding updates to this criterion – although the comments that were received mentioned that these shower timers can be ‘annoying’ for guests. However, this position was not widely held and the criterion does not need to be changed as a result of this.
2. BEMP does not provide any guidance on the use of shower timers. However, these devices could leave to potential water savings.

The criterion shall remain as:

First proposal for revised criterion:

Shower timers (1.5 points)

All showers in sanitary facilities/common areas shall have a timing/proximity device which interrupts water flow after a defined time or if not in use.

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

Relevant stakeholder comments and further research after AHWG1

Limited feedback was received for this criterion (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update:

Following limited stakeholder feedback on adjusting the allocation of points to the criterion, the proposal is to retain the 1.5 points. Reference in the criterion to a ‘proximity’ device for all showers has been removed as it was felt that this was not practicable. Furthermore, only shower timers are noted in the criterion title. With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of that there is no reference in BEMP to this type of requirement and that water flow from taps

and showers is addressed as mandatory and optional criteria in order to decrease the water consumption from showers.

2.1.8.9 **Criterion 59: Swimming pool cover**

Current criterion:

Swimming pool cover (1 point)

At night or when the filled swimming pool is not used for more than a day, it shall be covered to prevent the cooling of the water in the pool and to reduce evaporation.

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

Feedback:

A number of comments were received on this criterion which related to some of the impracticalities of using pool covers. In particular, it was suggested that in Mediterranean areas it is counterproductive to cover swimming pools as during the daytime the water get to hot, and needs to cool down over night, rather than retain its heat.

BEMP:

BEMP for the operating of swimming pools does suggest the correct use of pool covers to reduce heat loss. This is in accordance with the current EU Ecolabel criterion for the use of pool covers. However, BEMP does not specify best practice for non-heated swimming pools versus heated.

Proposed updates:

It is suggested that this criterion is rationalised to make a distinction between non-heated and heating swimming pools. In both cases, pool covers should be used to reduce evaporation from the swimming pool, therefore minimising water usage.

First proposal for revised criterion:

Swimming pool cover (1 point)

Heated swimming pools shall be covered at night to prevent the cooling of the water in the pool and to reduce evaporation. (1 point)

Or

Non-heated, filled swimming pools shall be covered when these are not used for more than a day to reduce evaporation (1 point)

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

Relevant stakeholder comments and further research after AHWG1

Limited feedback was received for this criterion (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update:

Stakeholder feedback requested clarification on the allocation of points for covered heated filled swimming pools and covered non-heated filled swimming pools. The proposal is that

the criterion is amended to clarify that 1 point is allocated irrespective of how many of each type of swimming pool is on the tourist accommodation site.

Current proposal for revised criterion:

Criterion 46: Swimming pool cover (1 point)

Heated swimming pools shall be covered at night to prevent the cooling of the water in the pool and to reduce evaporation, and/or non-heated, filled swimming pools shall be covered when these are not used for more than a day to reduce evaporation. (1 point shall be allocated if all swimming pools (heated swimming pools and/or filled, non-heated swimming pools) are covered).

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

2.1.8.10 **Criterion 60: De-icing**

Current criterion:

De-icing (up to 1.5 point)

Where de-icing of roads is necessary, mechanical means or sand/gravel shall be used in order to make roads on the tourist accommodation ground safe in case of ice/snow (1.5 points).

If chemical de-icing is used, substances which do not contain more than 1% chloride ion (Cl⁻) (1 point) or de-icers that have been awarded the Community eco-label or other national or regional ISO Type I eco-labels (1.5 points) shall be used.

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

Feedback:

A small amount of stakeholder feedback was received regarding de-icing of tourist accommodation. This primarily suggested that points should also be awarded for sites not carrying out any de-icing and, for example, simply telling staff to be cautious. However, it is suggested that the criterion is not changed to reflect this - in warmer climates no de-icing will also be undertaken and points should not be awarded for this.

BEMP:

BEMP primarily relates to minimising the use of chemicals on site, including those used for de-icing. There have been no updates to BEMP since the previous TAS and CSS criteria revision, and so no updates are suggested.

Proposed updates:

No EU Ecolabel has been developed for this category of products. It is proposed to delete the reference to EU Ecolabel.

First proposal for revised criterion:

De-icing (up to 1.5 point)

Where de-icing of roads is necessary, mechanical means or sand/gravel shall be used in order to make roads on the tourist accommodation ground safe in case of ice/snow (1.5

points).

If chemical de-icing is used, substances which do not contain more than 1% chloride ion (Cl⁻) (1 point) or de-icers that have been awarded a national or regional ISO Type I eco-labels (1.5 points) shall be used.

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

Relevant stakeholder comments and further research after AHWG1

Limited feedback was received for this criterion (see stakeholder comments received during and after the first AHWG in Annex III). Additionally, we understood that I propose to delete this criterion as very often de-icing of roads to the hotel is not under the responsibility of the tourism accommodation. It is suggested to remove this criterion.

2.1.8.11 Criterion 61: Indications on water hardness

Current criterion:

Indications on water hardness (up to 2 points)

In proximity to sanitary areas/washing machines/dishwashers there shall be displayed explanations on local water hardness (1 point) to allow better use of detergents by guests and staff or an automatic dosage system (1 point) shall be used which optimises detergent use according to water hardness.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation showing how the guest is informed.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received regarding updates to this criterion.
2. BEMP suggests that “in addition to training and signage, clear marking of fill levels on spray bottles can reduce the incidence of incorrect dilution. Dilution volumes should be adjusted for water hardness.” This is covered in the EU Ecolabel criterion.

The criterion will remain as:

First proposal for revised criterion:

Indications on water hardness (up to 2 points)

In proximity to sanitary areas/washing machines/dishwashers there shall be displayed explanations about local water hardness (1 point) to allow better use of detergents by guests and staff or an automatic dosage system (1 point) shall be used which optimises detergent use according to water hardness.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation showing how the guest is informed.

Relevant stakeholder comments and further research after AHWG1

Stakeholder feedback requested clarification on the allocation of points if both requirements in the criterion are met (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update:

The proposal is that the criterion is amended to clarify that 1 point is allocated for providing information about local water hardness and an additional 1 point is awarded if an automatic dosage system is in place.

Current proposal for revised criterion:

Criterion 47: Indications on water hardness (up to 2 points)

In proximity to sanitary areas/washing machines/dishwashers there shall be displayed explanations about local water hardness (1 point) to allow better use of detergents by guests and staff and an automatic dosage system (1 point) shall be used which optimises detergent use according to water hardness.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation showing how the guest is informed.

2.1.8.12 **Criterion 62: Water saving urinals**

Current criterion:

Water saving urinals (1.5 points)

All urinals shall use a waterless system or have a manual/electronic flushing system, which permits single flushing of every urinal only when used.

Assessment and verification: The applicant shall provide detailed supporting documentation of how the tourist accommodation fulfils this criterion.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received relating to this criterion.
2. BEMP measures are outlined as the “Installation or retrofitting of controlled-flush or waterless urinals”. This corresponds with the existing EU Ecolabel criterion and so no update is proposed.

The criterion shall remain as:

Proposal for revised criterion:

Water saving urinals (1.5 points)

All urinals shall use a waterless system or have a manual/electronic flushing system, which permits single flushing of every urinal only when used.

Assessment and verification: The applicant shall provide detailed supporting documentation of how the tourist accommodation fulfils this criterion.

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received for this criterion. A requirement on labelled urinals and toilets has been proposed. The title has been reworded to reflect the change. The assessment

and verification text has been further specified and the use of the EU Ecolabel certification is suggested to be used as a means of verification.

Current proposal for revised criterion:

Criterion 48: Water saving urinals and toilets (up to 3 points)

All urinals shall use a waterless system or have a manual/electronic flushing system, which permits single flushing of every urinal only when used. (1 point)

At least 50% of urinals shall have been awarded the EU ecolabel. (1 point)

At least 50% of toilets shall have been awarded the EU ecolabel. (1 point)

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation. Where EU Ecolabel flushing toilets and urinals products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2013/641/EU.

2.1.8.13 **Criterion 63: Indigenous species used for new outdoor planting**

Current criterion:

Indigenous species used for new outdoor planting (1 point)

Any planting of outdoor areas with trees and hedges shall be composed of indigenous species of vegetation.

Assessment and verification: The applicant shall provide the relevant specification of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation by an expert.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Very little stakeholder feedback was received relating to this criterion. It was suggested that species “in accordance with the location” could also be planted or perhaps some allowance made for a few decorative plants.
2. Best practice measures for tourist accommodation include “*Planting of green areas with indigenous species to minimise irrigation requirements*”. This is in line with the current EU Ecolabel criterion and so it is proposed that no update is made as a result of stakeholder comments.

The criterion shall remain as:

Fist proposal for revised criterion:

Indigenous species used for new outdoor planting (1 point)

Any planting of outdoor areas with trees and hedges shall be composed of indigenous species of vegetation.

Assessment and verification: The applicant shall provide the relevant specification of how the tourist accommodation fulfils this criterion, together with appropriate supporting

documentation by an expert.

Relevant stakeholder comments and further research after AHWG1

Stakeholder feedback requested clarification as to the meaning of 'indigenous' species of vegetation (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update:

With the aim to simplify the criteria set and regarding the difficulties on defining and verifying indigenous species it is proposed to remove this criterion.

2.1.8.14 New criterion: Swimming pool backwashing

The EU Ecolabel energy and disinfectant criteria for swimming pools is currently in line with best practice measures. There are, however, no specific water criteria for swimming pools in the current EU Ecolabel.

Best practice water management for tourist accommodation relates primarily to optimising backwash procedures to ensure water loss is minimised (further detail can be found in Section 4.2.1 of the Preliminary Report.)

It is therefore suggested that a new, optional, criterion is developed to fulfil these BEMP requirements.

However, it should be noted that no other environmental labels carry criteria specifically relating to backwashing of swimming pools.

The following additional criterion is proposed:

First proposal for new criterion:

Swimming pool backwashing (2 points)

The frequency and timing of swimming pool backwashing procedures have been optimised, and follow a documented procedure which has been developed to minimise water use. All relevant staff shall also be trained in following this procedure to ensure water use during backwashing is minimised.

Assessment and verification: the applicant shall demonstrate compliance by providing the document backwashing procedure along with a declaration confirming that this is followed and that staff are aware of the procedure. This will be checked as part of the on-site inspection.

Relevant stakeholder comments and further research after AHWG1

A stakeholder suggested that a "minimum and maximum" frequency of swimming pool backwashing is specified in the criterion (see stakeholder comments received during and after the first AHWG in Annex III). Since the criterion is optional and the focus is to follow manufacturers' recommended backwashing procedure, the criterion has been further specified to reflect this. References to staff training have been included on the criterion staff training. (See section 2.1.6.3)

Current proposal for new criterion:

Criterion 49: Swimming pool backwashing (2 points)

The frequency and timing of swimming pool backwashing shall be in line with manufacturer's recommendations.

Assessment and verification: the applicant shall demonstrate compliance by providing the document backwashing manufacturer procedure along with a declaration confirming that this is followed. This will be checked as part of the on-site inspection.

2.1.9 Optional criteria related to detergents and disinfectants

2.1.9.1 Criterion 64: Detergents

Current criterion:

Detergents (up to 3 points)

At least 80% by weight of hand dishwashing detergents and/or detergents for dishwashers and/or laundry detergent and/or all purpose cleaners and/or sanitary detergents and/or soaps and shampoos used by the tourist accommodation shall have been awarded the Community eco-label or other national or regional ISO Type I eco-labels (1 point for each of these categories of detergents up to a maximum of 3 points).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

Feedback:

There was limited stakeholder feedback for this criterion, although several suggestions for updates were made:

- The title of the criterion should be changed as soaps and shampoos (included in the list of products) are not detergents.
- Vinegar and other natural cleaning products could be included.

BEMP:

BEMP suggests a benchmark of excellence for the use of detergents, which specifies that "at least 70% of the purchase volume of chemical cleaning products (excluding oven cleaners) for dish washing and cleaning are Ecolabelled".

The current EU Ecolabel criterion exceeds this benchmark and so does not need to be adjusted.

Proposed updates:

This criterion meets the BEMP threshold and so the percentage threshold does not need to be increased. However, this criterion should relate to shampoos as well as detergents and so the title should be changed to reflect this. Although the inclusion of other natural cleaning products was suggested, it is proposed that this should not be included. This is primarily because 'natural products' may be hard to define and it may be difficult to find products which have undergone the same rigorous, life-cycle based assessment as those classified as type-I labels. In turn, this would make verification difficult.

The following change is therefore proposed:

First proposal for revised criterion:**Detergents and toiletries (up to 3 points)**

At least 80% by weight of hand dishwashing detergents and/or detergents for dishwashers and/or laundry detergent and/or all purpose cleaners and/or sanitary detergents and/or soaps and shampoos used by the tourist accommodation shall have been awarded the EU Ecolabel (1 point for each of these categories of products up to a maximum of 3 points).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that are awarded with the EU Ecolabel.

Relevant stakeholder comments and further research after AHWG1

All received comments during and after AHWG1 and responses are noted in Annex III. Limited stakeholder feedback was received regarding this criterion. Several stakeholders are in favour of including vinegar as a preferred cleaning product.

However the criterion is in line with the requirements of other schemes as Tripadvisor Greenleaders [Tripadvisor Greenleaders (2013)] which awards points to accommodation services that use certified cleaning products. Vinegar is not addressed within such criteria or other environmental labels for tourist accommodation. Against this background, it is proposed to keep retain the first proposed revised criterion.

Current proposal for revised criterion:**Criterion 50: Detergents and toiletries (up to 3 points)**

At least 80% by weight of hand dishwashing detergents and/or detergents for dishwashers according to the commission decision of 24 June 2011 on establishing the ecological criteria for the award of the EU Ecolabel to hand dishwashing detergents (2011/382/EU) and/or laundry detergent according to the commission decision of 28 April 2011 on establishing the ecological criteria for the award of the EU Ecolabel for laundry detergents (2011/264/EU) and/or all purpose cleaners and/or sanitary detergents according to the commission decision on establishing the ecological criteria for the award of the EU Ecolabel to all-purpose cleaners and sanitary cleaners (2011/383/EU) and/or soaps and shampoos according to the commission decision of 19 December 2013 amending Decision 2007/506/EC in order to prolong the validity of the ecological criteria for the award of the EU Ecolabel to soaps, shampoos and hair conditioners (2013/793/EU) used by the tourist accommodation shall have been awarded the EU Ecolabel (1 point for each of these categories of products up to a maximum of 3 points).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that are awarded with the above mentioned EU Ecolabel. Where EU Ecolabel of the above mentioned products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the above mentioned Commission Decisions.

2.1.9.2 Criterion 65: Indoor and outdoor paints and varnishes**Current criterion:**

Indoor and outdoor paints and varnishes (up to 2 points)

At least 50% of the indoor and/or outdoor painting of the tourist accommodation shall be done with indoor and/or outdoor paints and varnishes awarded the Community eco-label or other national or regional ISO Type I eco-labels (1 point for indoor, 1 for outdoor paints and varnishes).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

Feedback:

There was limited stakeholder feedback on this criterion. However, it was suggested that paint which has been verified by renowned ecological institutes (not only ecolabels) should be included within scope.

BEMP:

BEMP does not specifically apply to paints and varnishes use, but air quality should be considered in general.

Proposed updates:

Although there is little feedback on this criterion, there is likely to be some confusion at the verification stage. Currently, it is unclear whether the tourist accommodation building must *currently* be decorated with at least 50% Ecolabelled paints, or whether this applies to decorating and renovations *after* the application to EU Ecolabel. It is not clear, therefore, how compliance with the criterion is assessed – this could be, for example:

- Based on the amount of EU Ecolabelled paint currently stocked at the tourist accommodation.
- Reliant on a pledge from the tourist accommodation that any painting going forwards will use a proportion of EU Ecolabelled paint.
- Dependent on the tourist accommodation proving that all previous painting was carried out with the correct proportion of EU Ecolabelled paint.

In each of these cases, supporting evidence may be difficult to obtain.

Due to these issues the following update is proposed:

The criterion will be maintained, with no changes made. In addition, assessment and verification requirements could be further outlined, in any corresponding User Manual., for example:

Points can only be awarded for this criterion where the use of Ecolabelled paints can be verified. Where Ecolabelled paint has already been used, the tourist accommodation must be able to: indicate which areas of the building have been painted with this Ecolabelled paint (and estimate this as a percentage of the total building), and specify which brand of paint was used (providing relevant receipts/invoices). Where decorating/renovations are yet to be carried out, receipts/invoices should be kept as evidence that Ecolabelled paints have been used. Picture evidence would also be useful to show that Ecolabelled paint is being used. If paint is stored on site, this will be checked during any site visit.

Verification requirement would, however, still be open to some interpretation. In this instance, the criterion would remain as:

First proposal for revised criterion:

Indoor and outdoor paints and varnishes (up to 2 points)

At least 50% of the indoor and/or outdoor painting of the tourist accommodation shall be done with indoor and/or outdoor paints and varnishes awarded the EU Ecolabel or other national or regional ISO Type I eco-labels (1 point for indoor, 1 for outdoor paints and varnishes).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

Relevant stakeholder comments and further research after AHWG1

Limited comments received for this criterion (Annex III). This criterion is not addressing main environmental hotspots. Furthermore, it is not easy to verify as it has to be either past or forward looking, thus it is proposed to remove it.

2.1.9.3 Criterion 66: Car washing only in specially outfitted areas**Current criterion:****Car washing only in specially outfitted areas (1 point)**

Car washing shall not be allowed, or shall be allowed only in areas which are specially equipped to collect the water and detergents used and channel them to the sewerage system.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received regarding this criterion.
2. No specific guidance in BEMP regarding car washing.

Note that this criterion applies to camp sites only.

The criterion will remain as:

First proposal for revised criterion:**Car washing only in specially outfitted areas (1 point)**

Car washing in campsite services shall not be allowed, or shall be allowed only in areas which are specially equipped to collect the water and detergents used and channel them to the sewerage system.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received for this criterion and no updates are proposed.

Update proposal:

With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and no specific BEMP guidance for car washing.

2.1.9.4 **Criterion 67: Support to alternatives to artificial barbecue lighter**

Current criterion:

Support to alternatives to artificial barbecue lighter (1 point)

Excluding artificial barbecue lighting products, alternative products such as rape seed oil, hemp products, shall be sold in shops.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Very little stakeholder feedback was received regarding this criterion; the only suggestions being that perhaps this is of little relevance to most tourist accommodation sites.
2. BEMP does not provide specific guidance on the use of alternatives to artificial barbecue lighters.
3. No new products are available on the market which may be used as other alternatives to barbecue lighters.

This criterion may, however, be of particular relevance to campsites and so should be retained, with no change.

The criterion will remain as:

First proposal for revised criterion:

Support to alternatives to artificial barbecue lighter (1 point)

Excluding artificial barbecue lighting products, alternative products such as rape seed oil, hemp products, shall be sold in shops.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.

Relevant stakeholder comments and further research after AHWG1

All received comments during and after AHWG1 and responses are noted in Annex. IV. Limited stakeholder feedback was received regarding this criterion.

Proposed update

With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and no specific BEMP guidance for alternatives to artificial barbecue lighters.

2.1.9.5 **Criterion 68: Dosage of disinfectants or natural/ecological swimming pools**

Current criterion:

Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (1 point)

The swimming pool shall have an automatic dosage system that uses the minimum amount of disinfectant for the appropriate hygienic result (1 point).

Or

The swimming pool shall be of the ecological/natural type with only natural elements guaranteeing for the hygiene and safety of the bathers (1 point).

Assessment and verification: The applicant shall provide a technical documentation concerning the automatic dosage system or the type of ecological/natural swimming pool and its maintenance.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. The only stakeholder feedback received highlighted the costs involved in installing natural swimming pools. This does not suggest that any change to the criterion needs to be made.
2. BEMP for swimming pools outlines best practice measures as:
 - a. Installation of, or conversion of an existing pool to, a natural pool.
 - b. Installation of automatic dosing.

This is directly in line with the existing EU Ecolabel criteria and so it is proposed that this criterion is maintained.

The criterion will remain as:

First proposal for revised criterion:

Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (1 point)

The swimming pool shall have an automatic dosage system that uses the minimum amount of disinfectant for the appropriate hygienic result (1 point).

Or

The swimming pool shall be of the ecological/natural type with only natural elements guaranteeing for the hygiene and safety of the bathers (1 point).

Assessment and verification: The applicant shall provide a technical documentation concerning the automatic dosage system or the type of ecological/natural swimming pool and its maintenance.

Relevant stakeholder comments and further research after AHWG1

All received comments during and after AHWG1 and responses are noted in Annex. IV. Limited stakeholder feedback was received regarding this criterion. Several stakeholders were in favour of increasing the allocation of points to the criterion.

Proposed update:

It is proposed to increase the number of points for an ecological swimming pool to 2 points to reflect the differential in the investment costs between an ecological and non-ecological pool.

Current proposal for revised criterion:

Criterion 51: Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (2 points)

The swimming pool shall have an automatic dosage system that uses the minimum amount

of disinfectant for the appropriate hygienic result (1 point).

Or

The swimming pool shall be of the ecological/natural type with only natural elements guaranteeing the hygiene and safety of the bathers (2 points).

Assessment and verification: The applicant shall provide a technical documentation concerning the automatic dosage system or the type of ecological/natural swimming pool and its maintenance.

Discussion points

With the aim to simplify the criteria, stakeholders are invited to provide their opinion on the possibility to keep or remove the criterion part *"The swimming pool shall have an automatic dosage system that uses the minimum amount of disinfectant for the appropriate hygienic result (1 point)"* according to the environmental benefit of the proposed criterion.

2.1.9.6 Criterion 69: Mechanical cleaning

Current criterion:

Mechanical cleaning (1 point)

The tourist accommodation shall have precise procedures for conducting chemical-free cleaning, such as use of micro-fibre products or other non-chemical cleaning materials or activities with similar effects.

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

Feedback:

There were very few comments on this criterion. However, it was suggested that 'mechanical cleaning' should be better defined and should allow the use of natural products.

BEMP:

There is no specific BEMP guidance on mechanical cleaning but some comments on efficient cleaning methods:

"Best practice is also to train staff on the implementation of water- and chemical-efficient cleaning methods, and to procure environmentally certified consumables for bedrooms and bathrooms."

Proposed update:

Currently the criterion is unclear as to how much cleaning must be undertaken manually to obtain points.

It is proposed that the requirements for this criterion are clarified – for an applicant to receive this point, all cleaning (unless required by law or contrary to proper hygiene practices) should be carried out as chemical-free. Although feedback suggested the use of natural product should also be allowed, this may cause problems in the verification stage in defining which products can be included under this definition.

The following update is therefore proposed:

Proposal for revised criterion:

Mechanical cleaning (1 point)

The tourist accommodation shall have precise procedures for conducting chemical-free cleaning, such as use of micro-fibre products or other non-chemical cleaning materials or activities with similar effects. To fulfil this criterion, all cleaning must be carried out without the use of chemicals except where required by law or by hygiene or health and safety practices. Note that the use of water is acceptable as a 'chemical-free cleaning' method.

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

Relevant stakeholder comments and further research after AHWG1

All received comments during and after AHWG1 and responses are noted in Annex. IV. Limited stakeholder feedback was received regarding this criterion. A Competent Body suggested that it may not be practical to carry out all cleaning without chemicals. Several stakeholders claimed that it is too strict and not hygienic.

Proposed update:

With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and no specific BEMP guidance for mechanical cleaning. Furthermore, criteria 17 and 64 on disinfectants and detergents are already in place.

2.1.9.7 Criterion 70: Organic gardening

Current criterion:

Organic gardening (2 points)

Outside areas shall be managed either without any use of pesticides or according to organic farming principles, as laid down in Council Regulation (EC) No 834/2007, or as laid down in national law or recognised national organic schemes.

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

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Regulation (EC) No 834/2007 is still in force and so no update is required.
2. No feedback was received regarding this criterion.
3. Although organic gardening is not specified as BEMP, best practise suggests minimising the use of pesticides and other chemicals throughout the tourist accommodation. This corresponds with existing EU Ecolabel criteria and so no change is proposed.

The criterion will therefore remain as:

First proposal for revised criterion:

Organic gardening (2 points)

Outside areas shall be managed either without any use of pesticides or according to organic farming principles, as laid down in Council Regulation (EC) No 834/2007, or as laid down in national law or recognised national organic schemes.

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

Relevant stakeholder comments and further research after AHWG1

Limited stakeholder feedback was received for this criterion (see stakeholder comments received during and after the first AHWG in Annex III) and no updates to the revised criterion are proposed (Criterion 52).

Discussion points

With the aim to simplify the criteria, stakeholders are invited to provide their opinion on the possibility to keep or remove the criterion "*Organic gardening (2 points)*" according to the environmental benefit of the proposed criterion.

2.1.9.8 Criterion 71: Insect and pest repellents

Current criterion:

Insect and pest repellents (up to 2 points)

Architectural design of the accommodation and hygiene practices (such as building on stilts to prevent rats entering premises, use of mosquito nets and coils) shall ensure that the use of insect and pest repellents in the tourist accommodation is kept to a strict minimum (1 point).

If insect and pest repellents are used, only substances which are allowed for organic farming (as laid down in Regulation (EC) No 834/2007) or that have been awarded the Community eco-label or other national or regional ISO Type I ecolabel shall be used (1 point).

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

Feedback:

Very little stakeholder feedback was received regarding this criterion; one suggestion was that points should be offered for not using insect repellent at all. However, this will be impossible to prove at the verification stage and so it is suggested that this change is not made.

BEMP:

BEMP does not provide specific guidance on the use of insect and pest repellent but does highlight that pesticide use should generally be reduced – as is encouraged by the existing criteria.

Proposed updates:

No EU Ecolabel has been developed for this category of products. It is proposed to delete the reference to EU Ecolabel.

First proposal for revised criterion:

Insect and pest repellents (up to 2 points)

Architectural design of the accommodation and hygiene practices (such as building on stilts to prevent rats entering premises, use of mosquito nets and coils) shall ensure that the use of insect and pest repellents in the tourist accommodation is kept to a strict minimum (1 point).

If insect and pest repellents are used, only substances which are allowed for organic farming (as laid down in Regulation (EC) No 834/2007) or that have been awarded a national or regional ISO Type I ecolabels shall be used (1 point).

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

Relevant stakeholder comments and further research after AHWG1

Stakeholder feedback was positive as to whether mosquito nets should be provided in all the rooms, but only if this is the appropriate action necessary to ensure that the use of chemical based insect and pest repellents are minimised (see stakeholder comments received during and after the first AHWG in Annex III). Furthermore, a stakeholder highlighted the difficulty of defining “*strict*” with reference to the minimum use of repellents

Proposed update:

It is proposed that “*strict*” is removed.

Current proposal for revised criterion:

Criterion 53: Insect and pest repellents (up to 2 points)

Architectural design of the accommodation and hygiene practices (such as building on stilts to prevent rats entering premises, use of mosquito nets and coils) shall ensure that the use of insect and pest repellents in the tourist accommodation is kept to a minimum (1 point).

If insect and pest repellents are used, only substances which are allowed for organic farming (as laid down in Regulation (EC) No 834/2007) or that have been awarded a national or regional ISO Type I ecolabels shall be used (1 point).

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

Discussion points

With the aim to simplify the criteria, stakeholders are invited to provide their opinion on the possibility to keep or remove the criterion “*Insect and pest repellents (up to 2 points)*” according to the environmental benefit of the proposed criterion.

2.1.10 Optional criteria related to waste

2.1.10.1 Criterion 72: Composting

Current criterion:

Composting (up to 2 points)

The tourist accommodation shall separate relevant organic waste (garden waste 1 point; kitchen waste 1 point) and shall ensure that it is composted according to local authority guidelines (e.g. by the local administration, in-house or by a private agency).

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

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Very little stakeholder feedback was received regarding this criterion; the only suggestion was that the criterion should specify that composting should be carried out on site. However, this may be impractical for many sites – this is reflected currently by the criterion which allows composting through a number of routes.
2. BEMP highlights the importance of properly managing food waste by first minimising avoidable waste. In addition, by ensuring “all organic waste is separated and sent for anaerobic digestion where available, or alternatively incineration with energy recovery or local/on-site composting.” This corresponds with the current EU Ecolabel criterion.

The criterion will therefore remain as:

First proposal for revised criterion:

Composting (up to 2 points)

The tourist accommodation shall separate relevant organic waste (garden waste 1 point; kitchen waste 1 point) and shall ensure that it is composted according to local authority guidelines (e.g. by the local administration, in-house or by a private agency).

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

Relevant stakeholder comments and further research after AHWG1

All received comments during and after AHWG1 and responses are noted in Annex. IV. Limited stakeholder feedback was received regarding this criterion.

BEMP highlights the importance of properly managing food waste by first minimising avoidable waste. In addition, by ensuring “all organic waste is separated and sent for anaerobic digestion where available, or alternatively incineration with energy recovery or local/on-site composting.” Furthermore, the LCA review revealed that one of the authors reviewed suggested that the introduction of domestic solid waste composting would contribute to a reduction in the quantity of waste produced in this particular hotel. It is a simple activity and the necessary investment is low.

The Tripadvisor Greenleaders scheme [Tripadvisor Greenleaders (2013)] awards points for each of the following materials which are composted:

Food waste which is compostable includes vegetable and fruit waste, anything made out of flour, grains, coffee grounds, and eggshells.

Yard waste includes leaves, grass clippings, and dead plants.

Biodegradable products include disposable food service items and packaging, such as corn-based materials. Always double check that something is compostable before attempting to compost it.

Additional information concerning composting methods is provided at the above mentioned scheme:

Composting On-site & Composting Off-site

- Composting turns organic matter such as food and yard waste into nutrient-rich fertilizer. This can be done on-site or taken off-site for processing by a compost hauler. Composting reduces the amount of waste sent to landfills, and instead re-purposes it to be used to improve soil and garden quality.
- To compost, organic matter such as food waste and yard waste is gathered and placed inside a compost bin. Two types of waste input are necessary for successful composting: 'green stuff' (e.g., fruit, vegetables, grass clippings), which is high in nitrogen and which activates the heat for the process, and 'brown stuff' (e.g., dead plants, old flowers), which is high in carbon and keeps everything firm. Other variables such as air, temperature, water and starter compost (this helps to start the compost cycle more quickly) also need to be controlled.

Bio-mass Digestors breakdown biodegradable material through anaerobic digestion. This manages waste efficiently and can also be used as an energy source.

Proposed updates:

It is proposed to keep the revised criteria. It is suggested that the criterion is aligned to Trip advisor Greenleaders and to award an extra point to those applicants that compost biodegradable materials and that compost the waste produced by guests. Information related to composting methods and relevant material waste could be included at the User Manual in order to reduce complexity.

Current proposal for revised criterion:

Criterion 54: Composting (up to 4 points)

The tourist accommodation shall separate following relevant waste:

- yard waste (1 point)
- food waste from restoration service (1 point),
- biodegradable products (e.g. disposable items made of corn-based materials) (1 point),
- waste produced by guests ate their room/accommodation (1 point),

and shall ensure that it is composted according to local authority guidelines (e.g. by the local administration, in-house or by a private agency).

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

2.1.10.2 **Criterion 73: Disposable drink containers**

Current criterion:

Disposable drink containers (2 points)

Disposable drink containers shall not be offered in the areas under the ownership or the direct management of the tourist accommodation.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with an indication of which such disposable products are used, if any, and the legislation requiring this.

Feedback:

There were no specific comments on this criterion. However, Criterion 20: Disposable products, refers to drinks containers, and a number of stakeholders commented on this. Overall, there was a conflicting view on whether or not there should be a total ban on all disposable drinks containers (i.e. should Criterion 73 be made mandatory?). However, this was not a widely discussed point and so no conclusions can be easily drawn from this.

BEMP:

BEMP does not relate specifically to disposable drinks containers, but does recommend avoiding procurement of single-use items.

Other updates:

Criterion 19: Disposable products, states that “Disposable drinking systems (cups and glasses), plates and cutlery shall only be used if they made out of renewable raw materials and are biodegradable and compostable according to EN 13432.” This criterion is mandatory and so all tourist accommodation sites will adhere to this as a minimum.

Proposed update:

The current criterion awards points to tourist accommodation site who take no action at all, i.e. those who do not offer any drinks to guests.

Relevant stakeholder comments and further research after AHWG1

All received comments during and after AHWG1 and responses are noted in Annex III. A stakeholder (CB) suggested keeping this criterion as the real scope of this criterion is to ban plastic bottles drink containers, cans, etc... A stakeholder claimed that as currently worded the current criterion awards points to tourist accommodation sites that take no action at all and this cannot be compared to the one who makes an effort to buy appropriate drinks.

Proposed update:

The proposal is to merge this criterion, that addresses disposable drink containers, with the criterion that encourages the tourist accommodation to offer beverages in returnable/refillable bottles (Criterion 86: Returnable or refillable bottles).The criterion has been renamed ‘Beverages provision’.

Current proposal for revised criterion:

Criterion 55: Beverages provision (3 points)

If beverages are offered under the ownership or the direct management of the tourist accommodation:

disposable drink containers shall not be offered in the areas under the ownership or the direct management of the tourist accommodation. Instead, the tourist accommodation shall offer beverages in returnable/refillable bottles: soft drinks (1 point), beer (1 point), wine (1 point) and water (1 point).

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

2.1.10.3 **Criterion 74: Fat/oil disposal**

Current criterion:**Fat/oil disposal (up to 2 points)**

Fat separators shall be installed and pan fat/oils and deep-frying fat/oils shall be collected and disposed of appropriately (1 point). Proper disposal of own fat/oil is offered to guests (1 point).

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

Feedback:

No feedback was received for this criterion.

BEMP:

BEMP does not provide specific guidance on fat/oil disposal, but does indicate that “*separated waste collection facilities [should be available] throughout the establishment, to ensure that there is a clear procedure for staff waste separation, and to contract relevant recycling services at least for glass, paper and cardboard, plastics, metals and organic waste.*”

Other updates:

This criterion exceeds that which is outlined as best practice. However, mandatory Criterion 19: Waste separation, states that waste (including fats/oils) shall be separated into categories that can be “handled separately by the local or national waste management facilities”. This suggests that it is mandatory for fat/oil to be collected and disposed of appropriately, where facilities are available.

It is therefore suggested that Criterion 74: Fat/oil disposal is removed.

Relevant stakeholder comments and further research after AHWG1

Stakeholder feedback agreed that the criterion should be removed (see stakeholder comments received during and after the first AHWG in Annex III).

2.1.10.4 Criterion 75: Run-off from car parks**Current criterion:****Run-off from car parks (1 point)**

Oil and similar run-off from vehicles on the car park shall be collected and correctly disposed of.

Assessment and verification: The applicant shall provide a detailed explanation on how the camp site fulfils this criterion, together with appropriate supporting documentation.

This content of this criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received regarding this criterion.
2. BEMP does not provide any updates for guidance regarding car park run-off, but specifies that this should be correctly managed. This suggests no update to the criterion is required.

However, the existing criterion is only applicable to camp sites – it is suggested that car park run-off could also be relevant other types of tourist accommodation and so the criterion should be expanded to reflect this.

The following is therefore proposed:

First proposal for revised criterion:

Run-off from car parks (1 point)

Oil and similar run-off from vehicles on the car park shall be collected and correctly disposed of.

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

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received regarding this criterion.

Proposed update:

With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement.

2.1.10.5 **Criterion 76: Used textiles, furniture and other products**

Current criterion:

Used textiles, furniture and other products (up to 3 points)

Used furniture, textiles and other products such as electronic equipment, shall be given to charity according to the tourist accommodation's policy (2 points) or sold (1 point) to other associations which collect and redistribute such goods.

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

This criterion does not require major updating, and so it is proposed that the only changes that are made relate to clarifications. This is based on the following:

1. Very little stakeholder feedback was received regarding this criterion; the only suggestions being that perhaps more information could be provided as to how this criterion can be verified – often charitable organisation may not provide receipts when items are donated. It is suggested that this is clarified
2. BEMP has not been updated since the previous TAS and CSS criteria revision, and still promotes the importance of the waste hierarchy as follows:

Reduce: Create as little waste as possible by not producing it to begin with – implement green procurement, do not over-order, select products with little packaging or returnable packaging.

Re-use: Consider where certain items can be re-used, sold or donated to others that can use them.

Sort: Have a system in place for sorting everyday waste items such as bottles, cans, cardboard and paper for recycling. Consider what else might be recycled, taking into account local disposal possibilities.

Recycle: Send sorted waste for recycling.

The EU Ecolabel criterion promotes re-use of used textiles, furniture and other products in line with this waste management hierarchy.

First proposal for revised criterion:

Used textiles, furniture and other products (up to 3 points)

Used furniture, textiles and other products such as electronic equipment, shall be given to charity according to the tourist accommodation's policy (2 points) or sold (1 point) to other associations which collect and redistribute such goods.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation e.g. receipts etc. Where evidence (such as a receipt) is not given to tourist accommodations' upon donation of goods, the tourist accommodation should keep a record of the goods donated, where and when they were donated, and the person responsible for this.

Relevant stakeholder comments and further research after AHWG1

See stakeholder comments received during and after the first AHWG in Annex III. Limited stakeholder feedback was received regarding this criterion. A licence holder mentioned that they give a second life to furniture (after their usable life within the TAS). They give to employees that may need them.

Proposed update:

It is proposed that the criterion is clarified to specify that only furniture, textiles and other products *that are capable of reuse* should be given to charity and the possibility to give the items to the employees have been included.

Current proposal for revised criterion:

Criterion 56: Used textiles, furniture and other products (up to 3 points)

All furniture, textiles and other products such as electronic equipment, that have reached the end of their usable life within the tourist accommodation, shall be given to charity and/or employees (2 points) or sold (1 point) to other associations which collect and redistribute such goods.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation e.g. receipts etc. Where evidence (such as a receipt) is not given to tourist accommodations' upon donation of goods, the tourist accommodation should keep a record of the goods donated, where and when they were donated, and the person responsible for this.

Discussion points

With the aim to simplify the criteria, stakeholders are invited to provide their opinion on the possibility to keep or remove the criterion "Used textiles, furniture and other products (up to 3 points)" according to the environmental benefit of the proposed criterion.

2.1.11 Optional criteria related to other services

2.1.11.1 Criterion 77 (campsite only): Regulation of traffic

Current criterion:

Regulation of campsite traffic (1 point) (campsites only)

All traffic (guests and maintenance/transport) inside the camp ground shall be limited to defined hours and areas.

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

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Only one comment was received for this criterion, suggesting that it could be tightened to further restrict traffic. However, this is problematic across different types of sites and so it is suggested that the criterion is maintained.
2. BEMP has not been updated since the previous CSS criterion revision – the focus is still on regulating traffic effectively to ensure minimisation of emissions.

Note that this criterion only applies to campsites.

The criterion will therefore remain as:

First proposal for revised criterion:

Regulation of campsite traffic (1 point) (campsites only)

All traffic (guests and maintenance/transport) inside the camp ground shall be limited to defined hours and areas.

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

Relevant stakeholder comments and further research after AHWG1

See stakeholder comments received during and after the first AHWG in Annex III.

Proposed update:

Following stakeholder feedback, it is proposed that Criterion 77: Regulation of campsite traffic and Criterion 78: Campsite generated traffic, are made applicable to all tourist accommodation services and not “*campsites only*”. Criteria 77 and 78 have been merged as both criteria address the same and name has been reworded accordingly.

Current proposal for revised criterion:

Criterion 57: Tourist accommodation traffic management (up to 2 points)

All traffic (guests and maintenance/transport) on the tourist accommodation site shall be limited to defined hours and areas. (1 point)

The tourist accommodation shall not use combustion motor vehicles for transport and maintenance on site. (1 point)

Assessment and verification: The applicant shall provide an explanation of how the tourist

accommodation fulfils this criterion, together with appropriate supporting documentation.

2.1.11.2 **Criterion 78 (campsite only): Campsite generated traffic**

Current criterion:

Campsite generated traffic (1 point) (campsites only)

The campsite shall not use combustion motor vehicles for transport and maintenance on the camp ground.

Assessment and verification: The applicant shall provide an explanation of how the campsite fulfils this criterion, together with appropriate supporting documentation.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received for this criterion.
2. There is no specific BEMP relating to the types of traffic used on the campsite grounds – the current criterion is therefore still relevant.

Note that this criterion only applies to campsites.

The criterion will remain as:

First proposal for revised criterion:

Campsite generated traffic (1 point) (campsites only)

The campsite shall not use combustion motor vehicles for transport and maintenance on the camp ground.

Assessment and verification: The applicant shall provide an explanation of how the campsite fulfils this criterion, together with appropriate supporting documentation.

Relevant stakeholder comments and further research after AHWG1

See stakeholder comments received during and after the first AHWG in Annex III.

Proposed update:

The criterion is proposed to be open to all kind of accommodation and to be merged with criterion 77. (See above)

2.1.11.3 **Criterion 79 (campsite only): Trolleys for guests on the campsite**

Current criterion:

Trolleys for guests on the campsite (1 point) (campsites only)

For transportation of luggage and shopping on the site, trolleys or other non-motorised means of transport shall be at guests' disposal free of charge.

Assessment and verification: The applicant shall provide an explanation of how the campsite fulfils this criterion, together with appropriate supporting documentation.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received regarding this criterion.
2. BEMP has not been updated since the previous CSS criterion revision – therefore no update to the criterion is required.

Note that this criterion only applies to campsites.

The criterion will remain as:

First proposal for revised criterion:

Trolleys for guests on the campsite (1 point) (campsites only)

For transportation of luggage and shopping on the site, trolleys or other non-motorised means of transport shall be at guests' disposal free of charge.

Assessment and verification: The applicant shall provide an explanation of how the campsite fulfils this criterion, together with appropriate supporting documentation.

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received regarding this criterion.

Proposed update:

With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement.

2.1.11.4 **Criterion 80 (campsite only): Unsealed surfaces**

Current criterion:

Unsealed surfaces (1 point) (campsites only)

At least 90% of the campsite area surface is not covered with asphalt/cement or other sealing materials, which hinder proper drainage and airing of the soil.

Assessment and verification: The applicant shall provide an explanation of how the campsite fulfils this criterion, together with appropriate supporting documentation.

This criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. No stakeholder feedback was received regarding this criterion.
2. BEMP has not been updated since the previous criterion revision of TAS and CSS criteria – therefore no update is required. Current BEMP references EU Ecolabel requirements as good practice in management of outside areas, including Criterion 80: Unsealed surfaces.

Note that this criterion only applies to campsites.

The criterion will therefore remain as:

Proposal for revised criterion:

Unsealed surfaces (1 point) (campsites only)

At least 90% of the campsite area surface is not covered with asphalt/cement or other sealing materials, which hinder proper drainage and airing of the soil.

Assessment and verification: The applicant shall provide an explanation of how the campsite fulfils this criterion, together with appropriate supporting documentation.

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received for this criterion. No updates are proposed. (Criterion 58)

2.1.11.5 Criterion 81: Roof landscaping

Current criterion:

Roof landscaping (2 points)

At least 50% of tourist accommodation buildings which have suitable roofs (flat roofs or roofs with a small angle of inclination) and are not used for other purposes shall be grassed or planted.

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

Feedback:

Feedback on this criterion was limited, although several stakeholders highlighted that meeting this criterion can be expensive and can be very difficult to achieve. One respondent did, however, suggest that 'façade greening' should also be considered.

BEMP:

BEMP suggests that "To maximise on-site biodiversity through planting of native species, installation of green or brown roofs and walls, and to minimise water consumption for irrigation and light pollution arising from outdoor lighting (e.g. through use of correctly-angled low-pressure sodium lamps)."

This is in line with the stakeholder feedback which suggests that both roof and façade greening should be considered in a criterion update.

Proposed updates:

Façade greening can provide the same benefits as roof landscaping and can be a good option where roofing is not suitable for planting. It is therefore suggested that the criterion be updated to include both roof and façade landscaping.

Proposal for revised criterion:

Roof and façade landscaping (2 points)

At least 50% of the tourist accommodation building(s) which have suitable roofs (flat roofs or roofs with a small angle of inclination) and/or façades and are not used for other purposes shall be grassed or planted.

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

Relevant stakeholder comments and further research after AHWG1

Stakeholder feedback received for this criterion requested clarification on the allocation of points

Proposed update:

The criterion has been amended.

Current proposal for revised criterion:**Criterion 59: Roof and façade landscaping (up to 2 points)**

At least 50% of the tourist accommodation building(s) which have suitable roofs (flat roofs or roofs with a small angle of inclination) (1 point) and façades (1 point) and are not used for other purposes shall be grassed or planted.

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

Discussion points

With the aim to simplify the criteria, stakeholders are invited to provide their opinion on the possibility to keep or remove the criterion "Roof and façade landscaping" according to the environmental benefit of the proposed criterion.

2.1.11.6 Criterion 82: Environmental communication and education**Current criterion:****Environmental communication and education (up to 3 points)**

The tourist accommodation shall provide environmental communication and education notices on local biodiversity, landscape and nature conservation measures to guests (1.5 points). Guest entertainment includes elements of environmental education (1.5 points).

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

Feedback:

Limited feedback was received for this criterion – where comments were made, these suggested that this criterion could be simplified. However, it was also suggested that any environmental education should be carried out in coordination with the public body who is dealing with, and that “constant and effective interaction” with the guest should be encouraged. Despite this comment, it is suggested the criterion remains the same, to avoid further complications.

BEMP:

BEMP is to “provide guests with interactive on-site education of environmental issues, including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles)”. This is in line with the current EU Ecolabel criterion for environmental communication and education.

Proposed update:

Other comparable labels for tourist accommodation include criteria on promoting local goods and services, including providing guests with information on “*guides, restaurants, markets and craft centres*” [Travelife criteria (2012)]. It is suggested that this criterion is updated to

encourage tourist accommodation sites to make this information available to guests. This criterion will remain optional.

The proposed criterion is therefore:

First proposal for revised criterion:

Environmental communication and education (up to 3 points)

The tourist accommodation shall provide environmental communication and education notices on local biodiversity, landscape and nature conservation measures to guests (1 point).

The tourist accommodation shall provide communication on local guides, restaurants, markets, craft centres to guests (1 point).

Guest entertainment includes elements of environmental education (1 point).

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

Relevant stakeholder comments and further research after AHWG1

All received comments during and after AHWG1 and responses are noted in Annex. IV. Limited stakeholder feedback was received regarding this criterion.

Proposed update:

Minor amendments are proposed in the title in order to reflect the inclusion of the social requirements in the criterion.

Current proposal for revised criterion:

Criterion 60: Environmental and social communication and education (up to 3 points)

The tourist accommodation shall provide environmental communication and education notices on local biodiversity, landscape and nature conservation measures to guests (1 point).

The tourist accommodation shall provide communication on local guides, restaurants, markets, craft centres to guests (1 point).

Guest entertainment includes elements of environmental education (1 point).

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

2.1.11.7 **Criterion 83: No smoking in common areas and rooms**

Current criterion:

No smoking in common areas and rooms (up to 1.5 points)

Smoking shall not be allowed in 100% of indoor common areas and at least 70% (1 point) or at least 95% (1.5 points) of guests' rooms or rental accommodation.

Assessment and verification: The applicant shall indicate the number and nature of the areas and shall indicate which of these are non-smoking.

Feedback:

A number of comments were received regarding smoking in tourist accommodation – the majority of which suggested that all EU Ecolabelled tourist accommodation should be no-smoking throughout. However, outside of Europe where restrictions on smoking are more lax, a total ban on smoking throughout the tourist accommodation may be difficult to comply with.

In Europe, stringent anti-smoking laws mean that tourist accommodation sites typically have to comply with the first part of this criterion; no smoking in common areas. However, there is often an exemption in place which means some allocated rooms allow smoking.

BEMP:

BEMP does not provide any updates for smoking in tourist accommodation, but does suggest that air quality should be considered. This does not require an update to the existing criterion.

Proposed update:

Due to conflicting feedback from stakeholders, two options will be proposed for this criterion.

These options will be dependent on the agreed changes made to Criterion 22: No smoking in common areas.

Option 1:

This criterion could be maintained.

Proposal for revised criterion, Option 1:**Option 1: No smoking in common areas and rooms (up to 1.5 points)**

Smoking shall not be allowed in 100% of indoor common areas and at least 70% (1 point) or at least 95% (1.5 points) of guests' rooms or rental accommodation.

Assessment and verification: The applicant shall indicate the number and nature of the areas and shall indicate which of these are non-smoking.

Option 2:

This criterion could be tightened to a complete ban in all indoor areas, including guest rooms.

Proposal for revised criterion, Option 2:**Option 2: No smoking in common areas and rooms (up to 1.5 points)**

Smoking shall not be allowed in 100% of indoor common areas and guest accommodation.

Assessment and verification: The applicant shall provide a declaration to state that the tourist accommodation meets this criterion.

Relevant stakeholder comments and further research after AHWG1

See stakeholder comments received during and after the first AHWG in Annex III. Following stakeholder feedback, Option 1 was preferred.

Proposed update:

It is therefore proposed that the criterion is specified as in Option 1. Taking into account that mandatory criterion bans smoking in all indoor common areas, the option 1 is proposed to be modified to address the guest rooms.

Current proposal for revised criterion:**Criterion 61: No smoking in rooms (up to 1.5 points)**

Option 1: No smoking in common areas and rooms (up to 1.5 points)

Smoking shall not be allowed in at least 70% (1 point) or at least 95% (1.5 points) of guests' rooms or rental accommodation.

Assessment and verification: The applicant shall indicate the number and nature of the areas and shall indicate which of these are non-smoking.

2.1.11.8 Criterion 84: Bicycles**Current criterion:****Bicycles (1.5 points)**

Bicycles shall be made available to guests. (At least three bikes for every 50 rooms)

Assessment and verification: The applicant shall provide an explanation of how the tourist accommodation fulfils this criterion.

Feedback:

There was a wide range of feedback on this criterion, ranging from suggestions to increase the number of bikes required (to at least 6 for every room) to reducing the number required (as, for campsites in particular, guests may bring bikes with them) and suggesting that bikes should be made available to staff.

In addition, several comments suggested that points should be obtained through having a 'real local and close partnership' with bike hire companies in the area; this would require that this offer is actively communicated to guests.

BEMP:

BEMP does not specify best practice for the number of bikes which should be provided to guests in tourist accommodation. However, low-carbon forms of transport (including bikes) should be encouraged.

This suggests that encouragement of the use of bikes by guests is important, whether these are offered directly by the tourist accommodation or not.

Proposed updates:

It is suggested that this criterion be updated so that points are awarded to tourist accommodation sites which have active links with bicycle hire companies and communicate this clearly to guests. It is also important that the meaning of 'active links' is clear.

The following update is suggested:

First proposal for revised criterion:**Bicycles (1.5 points)**

Bicycles shall be made available to guests. (At least three bikes for every 50 pitches and/or rental accommodation units and/or rooms) (1.5 points)

Or

The tourist accommodation shall have active links with bicycle hire companies; access to these shall be clearly communicated to guests (1 point).

Assessment and verification: The applicant shall provide an explanation of how the tourist accommodation fulfils this criterion along with any information to be provided to guests. 'Active links' between tourist accommodation and a bicycle hire company should be visible on site. For example, the tourist accommodation should be actively promoting the hire company to guests and there should be evidence to show this e.g. promotional information. Where the hire company is not based on the site of the tourist accommodation, some practical considerations should be made. For example, the bicycle hire company may deliver bikes to the tourist accommodation service.

Relevant stakeholder comments and further research after AHWG1

See stakeholder comments received during and after the first AHWG in Annex III. A stakeholder requested clarification of the word “links”, which refers to the relationship a tourist accommodation is required to have with bicycle hire companies. A stakeholder mentioned that 3 bike for every 50 pitches means 3 bikes for 200 people. They proposed to increase the number to 10.

Proposed update:

Following stakeholder feedback it is proposed that “links” is replaced with “partnerships” and the number of minimum bikes has been increased.

Current proposal for revised criterion:

Criterion 62: Bicycles (1.5 points)

Bicycles shall be made available to guests. (At least ten bikes for every 50 pitches and/or rental accommodation units and/or rooms) (1.5 points)

Or

The tourist accommodation shall have active partnerships with bicycle hire companies; access to these shall be clearly communicated to guests (1 point).

Assessment and verification: The applicant shall provide an explanation of how the tourist accommodation fulfils this criterion along with any information to be provided to guests. 'Active partnerships' between tourist accommodation and a bicycle hire company should be visible on site. For example, the tourist accommodation should be actively promoting the hire company to guests and there should be evidence to show this e.g. promotional information. Where the hire company is not based on the site of the tourist accommodation, some practical considerations should be made. For example, the bicycle hire company may deliver bikes to the tourist accommodation service.

2.1.11.9 Criterion 85: Pick up service

Current criterion:

Pick up service (1 point)

The tourist accommodation shall offer guests travelling with public transport pick up service at arrival with environmentally friendly means of transportation such as electric cars or horse sleds.

Assessment and verification: The applicant shall provide an explanation on how the tourist accommodation fulfils this criterion and an example how it is communicated to guests.

Feedback:

The comments on this criterion suggested that points should be awarded to tourist accommodation sites if they are actively communication and operating a pick-up service at

arrival, not limiting this to only the use of 'environmentally friendly means of transportation'. A number of respondents suggested that the use of 'electric cars or horse sleds' is not very common, but perhaps car sharing or collective transport could be considered.

BEMP:

No specific BEMP is outlined for the use of a pick-up service, although the use of public transport and 'environmentally friendly' transport is to be encouraged. This suggests that the criterion should not be so restrictive, and that the main focus should be to encourage the use of public transport for arrival by providing a pick-up service.

Other updates:

A number of the LCA studies which were reviewed, revealed that transport to and from the tourist accommodation can have a significant environmental impact; the mode of transport is therefore important.

However (as outlined in the Stakeholder feedback), electric cars and horse sleds are not very common. In addition, the environmental impact of electric cars is dependent on the carbon intensity of the grid. It is collective transport that has been shown to have the greatest effect in reducing the environmental impact of transportation. The criterion should therefore focus on the promotion of this.

Proposed update:

It is therefore proposed that this criterion be updated to include collective transport, and better reflect common practice.

First proposal for revised criterion:

Pick up service (1 point)

The tourist accommodation shall offer guests travelling with transport a pick up service at arrival via a car sharing or a collective transport scheme (1 point)

Assessment and verification: The applicant shall provide an explanation on how the tourist accommodation fulfils this criterion and an example how it is communicated to guests. A collective transport scheme may, for example, include sharing transport (such as a minibus) between hotels. Guests booked in at different tourist accommodation sites may be picked up from public transport points in the same vehicle, and dropped off at the appropriate accommodation.

Relevant stakeholder comments and further research after AHWG1

All comments received during and after AHWG1 and responses are noted in Annex. IV. Limited stakeholder feedback was received regarding this criterion.

Several stakeholders expressed an issue with collective transport organized by the accommodation as customers tend to arrive at different times. Another stakeholder claimed that the focus must be on public transportation, so the criterion should specify: environmentally friendly means of transportation, such as public transport, electric cars or horse sleds (1 point) or Via a car sharing scheme (½ point)

Proposed update:

Public transportation is considered a best practice compared to the use of pick up service. As public transportation is promoted in the mandatory Criterion 23 which is proposed to be more comprehensive, it is suggested to remove this criterion.

Current criterion:

Returnable or refillable bottles (up to 3 points)

The tourist accommodation shall offer beverages in returnable/refillable bottles: soft drinks (1 point), beer (1 point), water (1 point).

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

This content of this criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Very few comments were received related to this criterion; no specific recommendations were made, but it was suggested that an indication of quantity could be added for returnable and refillable bottles. However, this is likely to be impractical for a number of tourist accommodation sites.
2. BEMP has not been updated since the previous TAS and CSS criteria revision, and still promotes the importance re-using products, as outlined in the waste hierarchy:
 - a. **Reduce:** Create as little waste as possible by not producing it to begin with – implement green procurement, do not over-order, select products with little packaging or returnable packaging.
 - b. **Re-use:** Consider where certain items can be re-used, sold or donated to others that can use them.
 - c. **Sort:** Have a system in place for sorting everyday waste items such as bottles, cans, cardboard and paper for recycling. Consider what else might be recycled, taking into account local disposal possibilities.
 - d. **Recycle:** Send sorted waste for recycling.

Through promoting this re-use, the EU Ecolabel criterion is in line with BEMP. The following will therefore be maintained:

Proposal for revised criterion:

Returnable or refillable bottles (up to 3 points)

The tourist accommodation shall offer beverages in returnable/refillable bottles: soft drinks (1 point), beer (1 point), water (1 point).

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

Relevant stakeholder comments and further research after AHWG1

A stakeholder requested that “wine” is added to the list of beverages that the tourist accommodation is required to provide in returnable/refillable bottles (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update:

This is practicable and therefore it is proposed that the revised criterion is amended to include *wine* for the award of an additional 1 point. The criterion is proposed to be merged with Criterion 73: Disposable drink containers. (See section 2.1.10.2).

2.1.11.11 **Criterion 87: Use of rechargeable products**

Current criterion:

Use of rechargeable products (up to 2 points)

The tourist accommodation shall use only rechargeable batteries for TV remote controls (1 point), and/or rechargeable cartridges for toner for printers and photocopiers (1 point).

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation from the suppliers of the batteries and/or the refillers of the toner cartridges.

Feedback:

No stakeholder feedback was received for this criterion.

BEMP:

BEMP outlines that “Single-use disposable items are avoided where possible (e.g. plastic bin liners are avoided, toner/ink cartridges are refilled and rechargeable batteries are selected).”

This is in line with the current EU Ecolabel criterion (for batteries and printer cartridges), although it is suggested that the criterion is updated to require that all consumables use rechargeable batteries, not just TV remotes. In addition, it is suggested that a point is added for tourist accommodation sites which don't use plastic bin liners – this should be clearly outlined in any User Manual, as follows:

One point is available where tourist accommodations' do not use single-use, disposable bin liners. For example, no points can be given where bin liners in guests' rooms and/or common areas are disposed of each day when rooms are cleaned.

Proposed update:

It is suggested that the criterion is updated to better fit with BEMP. These changes are reflected in the criterion below:

First proposal for revised criterion:

Reusable and rechargeable products (up to 3 points)

The tourist accommodation shall use only rechargeable batteries for all consumables (1 point), and/or rechargeable cartridges for toner for printers and photocopiers (1 point) and/or no bins in guest rooms or common areas shall use single-use (i.e. not reused) disposable plastic bin liners (1 point).

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation from the suppliers of the batteries and/or the refillers of the toner cartridges.

Relevant stakeholder comments and further research after AHWG1

All comments received during and after AHWG1 and responses are noted in Annex. IV. Limited stakeholder feedback was received regarding this criterion.

Proposed update:

It was suggested by a stakeholder not to include the ban on using single use bin liners for sanitary and quality reasons as bins might get dirty if a bin liner is not used. The criterion text and title have been modified and points have been amended accordingly.

Current proposal for revised criterion:

Criterion 63: Rechargeable products (up to 2 points)

The tourist accommodation shall use only rechargeable batteries for all consumables (1 point), and/or rechargeable cartridges for toner for printers and photocopiers (1 point).

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation from the suppliers of the batteries and/or the refillers of the toner cartridges.

Discussion points

With the aim to simplify the criteria, stakeholders are invited to provide their opinion on the possibility to keep or remove the criterion "Rechargeable products (up to 2 points)" according to the environmental benefit of the proposed criterion.

2.1.11.12 **Criterion 88: Paper products**

Current criterion:

Paper products (up to 3 points)

At least 80% of toilet/tissue paper and/or office paper and/or printed paper used shall have been awarded the Community eco-label or other national or regional ISO Type I eco-labels (1 point for each of these three categories of paper products).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

Feedback:

There was no stakeholder feedback on this criterion, and so it is assumed that this criterion should be maintained.

BEMP:

BEMP encouraged minimisation of the use of resources, "especially paper and ink" and to "select environmentally certified materials and services (e.g. printing services)" where possible. Again, this is in line with the current EU Ecolabel criteria for paper products.

Other updates:

Although this criterion does currently reflect best practice, it is suggested that the percentage of paper product required to obtain point is increased. There is now a very high market availability of these products and this should be reflected in the criteria update.

Proposed update:

This criterion is significant in reducing the amount of paper used on site – this is especially relevant as conference centres will now be explicitly included as 'in scope' for tourist accommodation. It is suggested that the percentage of paper products required to have the Ecolabel (or equivalent) be increased to reflect this.

First proposal for revised criterion:**Paper Products (up to 3 points)**

90% of toilet/tissue paper and/or office paper and/or printed paper used shall have been awarded the EU eco-label or other national or regional ISO Type I eco-labels (1 point for each of these three categories of paper products).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

Relevant stakeholder comments and further research after AHWG1

All comments received during and after AHWG1 and responses are noted in Annex. IV. One stakeholder requested that “*envelopes*” are included in the list of products that are required to have been awarded the EU Ecolabel or other national ISO Type 1 ecolabels.

Proposed update:

This is practicable and it is proposed that the revised criterion is amended to include envelopes. It is proposed to reduce the awarded points according to the environmental benefit compared to other criteria.

Current proposal for revised criterion:**Criterion 64: Paper Products (up to 2 points)**

90% of the following categories of paper products used shall have been awarded the EU Ecolabel:

- Toilet and/or tissue paper (1 point)
- Office paper (1 point)
- Printed paper (1 point)
- Envelopes (1 point)

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

Discussion points

With the aim to simplify the criteria, stakeholders are invited to provide their opinion on the possibility to keep or remove the criterion “*Paper Products (up to 3 points)*” according to the environmental benefit of the proposed criterion.

2.1.11.13 Criterion 89: Durable goods**Current criterion:****Durable goods (up to 3 points)**

At least 30% of any category of durable goods (such as bed-linen, towels, table linen, PCs, portables, TVs, mattresses, furniture, washing machines, dishwashers, refrigerators, vacuum cleaners, floor coverings, light bulbs) present in the tourist accommodation, including rental accommodation, shall have been awarded the Community eco-label or other national or regional ISO Type I eco-labels (1 point for each of up to three categories of durable goods).

Assessment and verification: The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label.

Feedback:

No feedback was received on this criterion.

BEMP:

In general, BEMP specifies that eco-labelled products (those certified to Type I schemes such as the EU Ecolabel) are preferable - environmental impacts have been considered and are minimised compared to other products on the market.

Other updates:

This criterion can be updated to include any new EU Ecolabelled product groups which have become available since the previous revision of the TAS and CSS criteria. These products include:

- Tapware
- Flushing toilets and urinals

Proposed update:

The criterion should be updated to include tapware and flushing toilets and urinals. No other changes are proposed.

First proposal for revised criterion:

Durable goods (up to 3 points)

At least 30% of any category of durable goods (such as bed-linen, towels, table linen, PCs, portables, TVs, mattresses, furniture, washing machines, dishwashers, refrigerators, vacuum cleaners, floor coverings, light bulbs) present in the tourist accommodation, including rental accommodation, shall have been awarded the EU ecolabel or other national or regional ISO Type I eco-labels (1 point for each of up to three categories of durable goods).

Assessment and verification: The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label.

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received for this criterion. It is proposed to delete the reference to EU Ecolabel for sanitary tapware, urinals and WCs as they are covered in other revised optional criteria. And it is proposed to add extra points in order to promote the use of certified goods which are identified as a best practice. The percentage has been however increased in order to increase the ambition level.

Current proposal for revised criterion:

Criterion 65: Durable goods (up to 5 points)

At least 50% of any category of durable goods (such as bed-linen, towels, table linen, PCs, portables, TVs, mattresses, furniture, washing machines, dishwashers, refrigerators, vacuum cleaners, floor coverings, light bulbs) present in the tourist accommodation, including rental accommodation, shall have been awarded the EU ecolabel or other national or regional ISO Type I eco-labels (1 point for each of up to three categories of durable goods).

Assessment and verification: The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label. The

applicant shall provide a copy of the ISO Type I eco-labels certificate.

2.1.11.14 **Criterion 90: Local food products**

Current criterion:

Local food products (up to 3 points)

At least two locally sourced and not out of season (for fresh fruit and vegetables) food products shall be offered at each meal, including breakfast (1.5 points).

Where applicable, consumption of local endangered species such as specific fish and crustacean species and 'bushmeat' and shrimps from mangrove forest endangering cultivation shall be forbidden in the food outlets (1.5 points) and in the shops (1.5 points).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.

Feedback:

There was limited feedback on this criterion specifically, but there were a number of comments highlighting the importance of encouraging use of local goods, not just food products. More detail on this can be found in section 4.5.1 of the Preliminary Report which discusses social criteria, such as impact on local community.

BEMP:

BEMP for kitchens in tourist accommodation is to "assess food and drink supply chains to identify environmental hotspots and key control points, including choice editing of menus to avoid particularly damaging ingredients (e.g. some out-of-season fruit), and selection of environmentally-certified products." In general, it is considered best practice to source all products locally where possible.

Proposed update:

In addition (as with Criterion 82, above) many comparable labels for tourist accommodation include criteria on procuring local goods and services. Although the EU Ecolabel criterion does specific local food products, it is proposed that this criterion could be broadened to include other local goods. This criterion will remain optional.

To bring this criterion into line with other environmental and sustainability labels for tourism, it is suggested that the second paragraph of the criterion is made mandatory.

The following (optional) criterion is therefore proposed:

First proposal for revised criterion:

Local products (up to 3 points)

At least two locally sourced and not out of season (for fresh fruit and vegetables) food products shall be offered at each meal including breakfast (1.5 points).

The tourist accommodation actively chooses local suppliers of other goods and services (1.5 points).

Assessment and verification: the applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.

Relevant stakeholder comments and further research after AHWG1

Stakeholders requested that the criterion remains optional (see stakeholder comments received during and after the first AHWG in Annex III). No updates are proposed to the revised criterion. (Criterion 66)

Discussion points

With the aim to simplify the criteria, stakeholders are invited to provide their opinion on the possibility to keep or remove the criterion "*Local products (up to 3 points)*" according to the environmental benefit of the proposed criterion.

2.1.11.15 **Criterion 91: Organic food**

Current criterion:

Organic food (up to 3 points)

The main ingredients of at least two dishes (1 point) or the whole menu including breakfast (2 points) and at least 4 products sold in the shop (1 point) shall have been produced by organic farming methods, as laid down in Regulation (EC) No 834/2007 or produced according to an ISO Type I eco-label.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.

Regulation:

There has been no change or update to Regulation (EC) No 834/2007 which might affect this criterion. However, it should be recognised that organic food produced according to an ISO Type I eco-label will have to comply with this regulation.

Feedback:

Several comments were received from Austria and Germany. In these countries it is possible for restaurants and hotels to become certified for the use of only organic products, and several respondents suggested that additional points should be awarded where this is the case. However, as these schemes are not available across Europe (or globally) it is suggested that the criterion should not be changed to reflect this but the assessment and verification section should note that these schemes may be used as supporting documentation of compliance.

BEMP:

BEMP for food provision refers to "choice editing of menus to avoid particularly damaging ingredients (e.g. some out of season fruit), and selection of environmentally-certified products." This is in line with Criterion 91: Organic food. This BEMP is also supported by Criterion 90: Local products.

Proposed update:

No change is proposed as a result of stakeholder feedback or the BEMP. Regulation (EC) No 834/2007 is also still in place. However, it is suggested that mention of ISO Type I eco-labels is removed as product containing these labels will themselves meet (EC) No 834/2007.

The following is therefore proposed:

First proposal for revised criterion:**Organic food (up to 3 points)**

The main ingredients of at least two dishes (1 point) or the whole menu including breakfast (2 points) and at least 4 products sold in the shop (1 point) shall have been produced by organic farming methods, as laid down in Regulation (EC) No 834/2007.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. In some countries, it is possible for restaurants and hotels to become certified when they use only organic products. Where a tourist accommodation is certified to this type of scheme (or similar) this information could be provided as evidence of compliance with this criterion.

Relevant stakeholder comments and further research after AHWG1

One stakeholder comment was received for this criterion requesting that 3 points are awarded for a full organic menu (see stakeholder comments received during and after the first AHWG in Annex III). Since this proposal was not supported, no change to the allocation of points is currently proposed. No updates to the revised criterion are proposed (Criterion 67).

2.1.11.16 Criterion 92: Indoor air quality**Current criterion:****Indoor air quality (up to 4 points)**

The tourist accommodation shall provide an optimal indoor air quality through one or both of the following measures:

- the rooms, rental accommodation and common areas shall correspond to the requirements laid down in point 3 of Annex I to Council Directive 89/106/EEC and shall contain only painting, decorating, furniture and other materials certified with the Community eco-label or another equivalent low emission ISO Type I environmental label (2 points);
- the rooms, rental accommodation and common areas shall be fragrance free, the sheets, towels and textiles shall be washed with fragrance free detergents (1 point) and cleaning shall be carried out with fragrance free means (1 point).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. As regards the fragrance free requirement, a list of components/ingredients of fragrance free washing and cleaning shall be considered as sufficient.

Regulation:

Council Directive 89/106/EEC was repealed by Regulation (EU) No 305/2011 [OJ L 88, 4.4.2011, p.5]. Point 3 of Annex I remains unchanged except the addition of one condition: *‘the release of dangerous substances into drinking water or substances which have an otherwise negative impact on drinking water’*

Feedback:

The difficulty in achieving this criterion is highlighted by a number of stakeholders. The most common suggestion is that “only [painting, decorating, furniture...]” is too strict and not practical to achieve. A number of stakeholders also wanted clarification about how this criterion could be achieved – in particular about how air quality can be “proved”.

BEMP:

There is no BEMP specific to indoor air quality for tourist accommodation.

Proposed update:

It is suggested that this criterion remains unchanged. Although this may be difficult to achieve, this criterion is optional and reflects best practice. The regulation outlined in the criterion does, however, require updating.

The following is therefore proposed:

Proposal for revised criterion:**Indoor air quality (up to 4 points)**

The tourist accommodation shall provide an optimal indoor air quality through one or both of the following measures:

- the rooms, rental accommodation and common areas shall correspond to the requirements laid down in point 3 of Annex I to [Regulation \(EU\) No 305/2011](#) and shall contain only painting, decorating, furniture and other materials certified with the [EU eco-label](#) or another equivalent low emission ISO Type I environmental label (2 points);
- the rooms, rental accommodation and common areas shall be fragrance free, the sheets, towels and textiles shall be washed with fragrance free detergents (1 point) and cleaning shall be carried out with fragrance free means (1 point).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. As regards the fragrance free requirement, a list of components/ingredients of fragrance free washing and cleaning shall be considered as sufficient.

Relevant stakeholder comments and further research after AHWG1

No stakeholder feedback was received regarding this criterion.

Proposed update:

With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement. Furthermore, there could be an overlap between criteria as EU Ecolabelled detergents, all purpose cleaners, paints etc... are already addressed in other criteria.

2.1.12 Optional criteria related to general management**2.1.12.1 Criterion 93: EMAS registration, ISO certification of the tourist accommodation****Current criterion:****EMAS registration (3 points), ISO certification (2 points) of the tourist accommodation**

The tourist accommodation shall be registered under the Community eco-management and audit scheme (EMAS) (3 points) or certified according to ISO 14001 standard (2 points).

Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification.

This content of this criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. EMAS registration and ISO 14001 certification are still in force and so no update is required.
2. No comments were received regarding this criterion.
3. BEMP encourages the formulation of an environmental management plan – as is encouraged through this existing criterion.

The following will therefore be maintained:

First proposal for revised criterion:

EMAS registration (3 points), ISO certification (2 points) of the tourist accommodation

The tourist accommodation shall be registered under the Community eco-management and audit scheme (EMAS) (3 points) or certified according to SO 14001 standard (2 points).

Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification.

Relevant stakeholder comments and further research after AHWG1

All comments received during and after AHWG1 and responses are noted in Annex. IV. Limited stakeholder feedback was received regarding this criterion.

Proposed update:

Mandatory criterion on environmental policy has been proposed to be deleted. On this basis it is proposed to promote optional criterion on ISO14001 and EMAS CERTIFICATION by adding extra points at optional criteria.

Current proposal for revised criterion:

Criterion 68: EMAS registration (4 points), ISO certification (3 points) of the tourist accommodation (up to 7)

The tourist accommodation shall be registered under the Community eco-management and audit scheme (EMAS) (4 points) or certified according to SO 14001 standard (3 points).

Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification.

2.1.12.2 **Criterion 94: EMAS registration, ISO certification of suppliers**

Current criterion:

EMAS registration (1.5 points) or ISO certification (1 point) of suppliers

At least one of the main suppliers or service providers of the tourist accommodation shall be registered with EMAS (1.5 points) or certified according to ISO 14001 (1 point).

Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification by at least one of his main suppliers.

This content of this criterion does not require updating, and so it is proposed that no changes are made. This is based on the following (identical to the rational for maintaining Criterion 93, above):

1. EMAS registration and ISO 14001 certification are still in force and so no update is required.
2. No comments were received regarding this criterion.
3. BEMP encourages the formulation of an environmental management plan – as is encouraged through this existing criterion.

The following will therefore be maintained:

Proposal for revised criterion:

EMAS registration (1.5 points) or ISO certification (1 point) of suppliers

At least one of the main suppliers or service providers of the tourist accommodation shall be registered with EMAS (1.5 points) or certified according to ISO 14001 (1 point).

Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification by at least one of his main suppliers.

Relevant stakeholder comments and further research after AHWG1

A stakeholder proposed changing the number of suppliers that are required to be EMAS or ISO 14001 registered from one to four. However, it is possible that this change would favour larger tourist accommodation services and make the criterion difficult for smaller tourist accommodation services to comply with (see stakeholder comments received during and after the first AHWG in Annex III).

Proposed update:

It is proposed that the criterion is revised to require two of the suppliers to be registered/certified as per the criterion. As several criteria have been removed in order to simplify the criteria set, some points should be reallocated in other criteria in order to retain the scoring rules of the points system. It is suggested to allocate extra points to this criterion as this is an environmental hot spot highlighted by BEMP.

Second proposal for revised criterion:

Criterion 69: EMAS registration (3 points) or ISO certification (2 points) of suppliers

At least two of the main suppliers or service providers of the tourist accommodation shall be registered with EMAS (3 points) or certified according to ISO 14001 (2 points).

Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification by at least two of his main suppliers.

2.1.12.3 Criterion 95: Compliance by subcontractors with mandatory criteria

Current criterion:

Compliance by subcontractors with mandatory criteria (up to 4 points)

Where additional services of food or leisure/fitness activities are subcontracted, those services shall comply with all the mandatory criteria of this Annex that apply to those specific services (2 point for each service of food and beverage and/or leisure facilities which is present on the tourist accommodation).

Assessment and verification: The applicant shall provide appropriate documentation of contractual agreements with his subcontractors regarding their compliance with the mandatory criteria.

Feedback:

No stakeholder feedback was received for this criterion.

BEMP:

In addition to the provision of food and leisure activities (including saunas and swimming pools), BEMP includes provisions for effective management of laundry services.

Proposed update:

It is suggested that reference is made to laundry services, in line with BEMP. This results in the following update:

First proposal for revised criterion:

Compliance by subcontractors with mandatory criteria (up to 4.5 points)

Where additional services of food, laundry or leisure/fitness activities are subcontracted, those services shall comply with all the mandatory criteria of this Annex that apply to those specific services (1.5 points for each service of food and beverage and/or laundry and/or leisure facilities which is present on the tourist accommodation).

Assessment and verification: The applicant shall provide appropriate documentation of contractual agreements with his subcontractors regarding their compliance with the mandatory criteria.

Relevant stakeholder comments and further research after AHWG1

A stakeholder suggested that points are allocated to each subcontractor that complies with all the mandatory criteria up to a maximum of 5 points (see stakeholder comments received during and after the first AHWG in Annex III). It is proposed that the level of investment required by the tourist accommodation does not justify an allocation of additional points and therefore the revised criterion remains the same. (Criterion 70)

2.1.12.4 **Criterion 96: Energy and water meters**

Current criterion:

Energy and water meters (up to 2 points)

The tourist accommodation shall have additional energy and water meters installed so as to allow data collection on consumption of different activities and/or machines, such as rooms, laundry and kitchen service and/or specific machines like refrigerators, washing machines, etc. (1 point). Every pitch has its own energy and/or water meter (1 point).

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with an analysis of the data collected (if already available).

This content of this criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Stakeholder opinions on this criterion were conflicting; suggestions included either removing this criterion or making this mandatory. On balance, it is suggested that

this criterion is maintained as optional to consider both sides of this argument. In addition, this criterion is not unachievable – tourist accommodation sites must already collect mandatory data on energy and water consumption within the site as a whole (Criterion 27: Energy and water consumption data). This option criterion awards points for further investment in monitoring activities.

2. BEMP encourages the use of meters to best identify possible efficiency improvements – this is reflected in the current EU Ecolabel criterion and so no update is required.

The following will therefore be maintained:

First proposal for revised criterion:

Energy and water meters (up to 2 points)

The tourist accommodation shall have additional energy and water meters installed so as to allow data collection on consumption of different activities and/or machines, such as rooms, laundry and kitchen service and/or specific machines like refrigerators, washing machines, etc. (1 point). Every pitch has its own energy and/or water meter (1 point).

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with an analysis of the data collected (if already available).

Relevant stakeholder comments and further research after AHWG1

No stakeholder comments were received at AHWG for this criterion. No updates are proposed to the revised criterion. (Criterion 71).

2.1.12.5 Criterion 97: Additional environmental actions

Current criterion:

Additional environmental actions (maximum 3 points)

Either:

(a) Additional environmental actions (up to 1.5 points each, to a maximum of 3 points): The management of the tourist accommodation shall take actions, additional to those provided for by way of criteria in this Section or in Section A, to improve the environmental performance of the tourist accommodation. The Competent Body assessing the application shall attribute a score to these actions not exceeding 1.5 points per action.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a full description of each additional action the applicant wishes to be taken into account.

Or:

(b) Eco-label award (3 points): The tourist accommodation shall be awarded one of the national or regional ISO Type I eco-labels.

Assessment and verification: The applicant shall provide appropriate evidence of having been awarded an eco-label.

This content of this criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:

1. Only a few comments were received for this criterion. Stakeholders mainly suggested that social measures could be added here – however, social aspects have been included in Criterion 27: Information to guests and with the development of a new criterion, Fundamental principles and rights at work (see Section 0). It was also suggested that this criterion may be too rigid and that it can be difficult for smaller sites to plan these additional environmental actions. It is suggested, however, that the criterion remains; this is an optional criterion and so does not restrict smaller sites from achieving the EU Ecolabel.
2. BEMP encourages the installation of an environmental management plan, in line with the current EU Ecolabel criterion.

The existing criterion will therefore be maintained. However, it is suggested that User Manuals clarify this criterion by providing the following information:

Additional environmental actions should be those which have a significant effect in reducing one or all of the following: energy consumption, water consumption, chemical substance use and/or waste production.

First proposal for revised criterion:

Additional environmental actions (maximum 3 points)

Either:

(a) Additional environmental actions (up to 1.5 points each, to a maximum of 3 points): The management of the tourist accommodation shall take actions, additional to those provided for by way of criteria in this Section or in Section A, to improve the environmental performance of the tourist accommodation. The Competent Body assessing the application shall attribute a score to these actions not exceeding 1.5 points per action.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a full description of each additional action the applicant wishes to be taken into account.

Or:

(b) Eco-label award (3 points): The tourist accommodation shall be awarded one of the national or regional ISO Type I eco-labels.

Assessment and verification: The applicant shall provide appropriate evidence of having been awarded an eco-label.

Relevant stakeholder comments and further research after AHWG1

A stakeholder suggested the criterion is further specified to avoid the risk of double counting environmental initiatives that may have already been scored against previous criteria (see stakeholder comments received during and after the first AHWG in Annex III).

Examples provided by stakeholders for social and environmental actions:

- *Applicants that go beyond the national legal requirement on the accessibility of the tourist accommodation for disabled people;*
- *Implementation of a shuttle in the late hours for the staff;*
- *Promotion of visits to local natural parks/organic farms, sponsorship of biodiversity protection activities/ historic and cultural initiatives;*
- *Provision of charging infrastructures for electric vehicles.*

Proposed update:

With the aim to simplify the criteria set, this criterion is suggested to be removed. It is considered too open and vague. We consider that the environmental hotspots are already covered and if environmental hotspot is identified during this revision should be covered as specific criteria.

DRAFT

2.2 Impact of changes to criteria after AHWG1

In general the ambition level of the revised criteria has been increased, especially for electricity procurement, water, waste environmental hot spots and social criteria. This may result in some additional burden on the tourist accommodation in terms of achieving some of the mandatory criteria and scoring some points in the optional criteria. This will primarily require a need for improved administrative and operating practices (for example, through the introduction of the new criterion, 'Fundamental principles and rights at work' or through the need for improved staff training). It should be noted, however, that since the updates are aligned, in most cases, to other environmental labels and/or reflect market availability of certain products, many tourist accommodation services will already be operating to these environmental practices and social standards and the updated criterion will simply reflect this.

With regards to the optional criteria, it is proposed that the less relevant criteria are removed with the aim to simplify the criteria set. This may result in reducing the burden on applicants and competent bodies. This change has resulted in a reallocation of points among other hot spot criteria in order to keep the same structure and scoring rules of the points system.

Table 15 outlines the number of points available in the current criteria set, compared with the points available after the proposed updates have been considered. A full table showing each criterion can be found in Annex III.

Table 15: Maximum number of points achievable for current and updated optional criteria

Criteria category	Tourist accommodation service		Campsites service	
	Current - maximum points achievable	Update - maximum points achievable	Current - maximum points achievable	Update - maximum points achievable
Energy	36.5	36	36.5	36
Water	20	20.5	20	20.5
Detergents and Disinfectants	12	9	13	9
Waste	9	10	10	10
Other Services	30	25	34	26
General Management	13.5	17.5	13.5	17.5
Total score	121	118	127	119

The table shows that although several of the criteria have been updated, the overall impact of a change in points is limited.

There are two criteria which relate specifically to campsites, and so the maximum number of point achievable is higher. This is also reflected in the number of points which the applicant must reach to quality for the award of the EU Ecolabel.

The EU Ecolabel criteria for tourist accommodation services and campsite services require a certain number of points to be achieved from optional criterion. Current criteria for tourist accommodation services require the following number of points:

Current tourist accommodation services points allocation:

In order to qualify for award of the eco-label, tourist accommodations must score a minimum of 20 points.

The total score required shall be increased by 3 points for each of the following additional

services which are offered that are under the management or ownership of the tourist accommodation:

- Food services (including breakfast),
- Leisure/fitness activities, which include saunas, swimming pools and all other such facilities which are within the tourist accommodation grounds. If the leisure/fitness activities consist in a wellness centre, the score required shall be increased by 5 points instead of 3,
- Green/outside areas, including parks and gardens which are open to guests.

Current criteria for campsites require the following number of points:

Current campsite services points allocation:

If the campsite does not offer other accommodations suitable for the provision of shelter to lodgers as part of its services, the minimum score required is 20; if it does, the minimum score required is 24.

The total score required shall be increased by 3 points for each of the following additional services which are offered that are under the management or ownership of the campsite:

- Food services (including breakfast);
- Leisure/fitness activities, which include saunas, swimming pools and all other such facilities which are within the campsite grounds. If the leisure/fitness activities consist in a wellness centre, the score required shall be increased by 5 points, instead of 3;
- Green areas which are not part of the campsite structure, such as parks, woods and gardens which are open to guests.

The update has resulted in fewer points being available. It is therefore necessary to consider whether or not the number of points required to award the EU Ecolabel should be altered to reflect this.

For a tourist accommodation or campsite **without** food services, outside areas and a fitness/wellness centre, the minimum required points are:

- 20 for tourist accommodation (16.5% of the total current available)
- 24 for campsites (18.9% of the total current available)

Keeping the same scoring rules but taking into account the new allocation of points, the minimum required points would be:

- 20 for tourist accommodation (16.9% of the total current available)
- 24 for campsites (20.1% of the total current available)

The reallocation of points does not impact significantly on the minimum percentage needed to award the label. It is therefore proposed that the scoring rules remain the same. The following is suggested. However stakeholders are invited to give their opinion on the validity of the current scoring rules (see consultation below):

Proposed update:

In order to qualify for award of the EU Ecolabel, tourist accommodations must score a minimum of 20 points. Where a campsite offers other accommodations suitable for the provision of shelter to lodgers as part of its service, the minimum score required is 24.

The total score required shall be increased by 3 points for each of the following additional services which are offered that are under the management or ownership of the tourist accommodation:

- *Food services (including breakfast);*
- *Leisure/fitness activities, which include saunas, swimming pools and all other such facilities which are within the tourist accommodation grounds. If the leisure/fitness activities consist in a wellness centre, the score required shall be increased by 5 points, instead of 3;*
- *Green/ outside areas, including parks and gardens which are open to guests. For campsites, this includes green areas which are not part of the campsite structure, such as parks, woods and gardens which are open to guests.*

In addition to the text, above, several stakeholders suggested that that the definitions of 'food service' and 'wellness centres' should be further defined. These definitions could be included in any supplementary User Manual for tourist accommodation:

Food services (including breakfast): *this includes the provision of either hot or cold food to guests, made or prepared on site. This may include, for example: an on-site restaurant which is operated by the tourist accommodation, a breakfast buffet, a bar serving food or providing room service to guests.*

Wellness Centre: *this includes any on-site establishment which offers health services for the body and mind- in addition to leisure/fitness activities including saunas, swimming pools and other similar facilities. A wellness centre may include, for example: a spa offering massages/aromatherapy etc. or a yoga centre.*

Although it is proposed to keep the current scoring rule it is suggested to introduce a minor modification in order to assure that applicants choose optional criteria among all the six sections covered (Energy, Water, Detergents, Waste, Other services and General management). It could be proposed to score a minimum of **4 points for energy section**, the main environmental hot spot and the section which has more optional criteria: **and 2 or 3 points for each of the other sections**. However feedback form stakeholders would be needed to before set a final proposal.

Consultation comments and discussion points:

Discussion points	
With the aim to assure that optional criteria for each area are used it could be proposed the need to score a minimum of <u>4 points for energy section</u> and <u>2 or 3 points for each of the other sections</u> .	Stakeholders, especially current licence holders are invited to provide additional feedback on this possibility.

Discussion points	
The reallocation of points does not impact significantly on the minimum percentage needed to award the label. It is therefore proposed that the scoring rules remain the same. However as mentioned before, there is a general increased level of stringency for the updated criteria and this may lead to difficulties to achieve optional points.	Current licence holders are invited to provide additional feedback on the difficulties to achieve the minimum points needed for the revised criteria.

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Acronyms

AA	Automobile Association
AHWG	Ad Hoc Working Group
ANPA	Italian Environment Protection Agency
AWC	annual water consumption
BEMP	Best environmental management practice
CB	Competent Body
CDP	chemical toilet disposal point
CSR	corporate social responsibility
CSS	camp site services
EDEN	European Destinations of Excellence
EEl	Energy Efficiency Index
EEIG EU	Hotel Standard Quality Seal
EMAS	Environmental Management and Audit Scheme
ERDF	European Regional Development Fund
ESF	European Social Fund
EUEB	European Union Ecolabelling Board
EuQSCS	European Quality Standard for Camping Sites
FEE	Foundation for Environmental Education
GCV	gross calorific value (energy input)
GDP	gross domestic product
GSTC	Global sustainable tourism council
GTBS	Green Tourism Business Scheme
GWD	Groundwater Directive (2006/118/EC)
HCMI	Hotel Carbon Measurement Initiative
HDD/CDD	Heating degree day/Cooling degree day
HES	Hotel Energy Solutions
HOTREC	Hotels, Restaurants and Cafes (the European Umbrella organisations for national associations representing hotels, restaurants, cafes and similar organisations)
HVAC	Heating, ventilation and air conditioning
IHG	InterContinental Hotels Group

ILO	International Labour Organisation
ISO	International Organization for Standardization
ITP	International Tourism Partnership
LCA	life cycle assessment
LED	light-emitting diode (lamp)
NACE	Nomenclature of Economic Activities
NECSTouR	Network of European regions committed to the issue of sustainable and competitive tourism
NOx	Nitrogen Oxides
SBS	Structural Business Statistics
TAS	tourist accommodation services
UHT	Ultra-heat treated (milk)
UNEP	United Nations Environment Programme
UNWTO	UN World Tourism Organization
WEEE	Waste Electrical and Electronic Equipment
WTTC	World Travel and Tourism Council

Annex I BEMP comparison with EU Ecolabel criteria

The table below lists the most important environmental aspects (or hotspots) for tourism, as identified in the 2013 report *Best environmental management practice in the tourism sector* (JRC). This is cross referenced against the current EU Ecolabel criteria to demonstrate that all of the significant environmental hotspots identified are already considered in existing criteria – a significant update of the criteria is therefore not required.

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
The most important actors and environmental aspects identified for the tourism sector.	Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).
Cross-cutting	
1. Undertake an assessment of the most important direct and indirect environmental aspects associated with the enterprise, and to apply relevant performance indicators and compare with relevant benchmarks of excellence as described in this document.	The EU Ecolabel includes criteria for: Developing an environmental management plan including environmental targets and monitoring (criteria 24, 27 and 28). Considering the impact of purchases of goods and services and green procurement, specifically encouraging the use of other EU Ecolabelled products (criteria 63, 64, 81 and 82). Ensuring efficient use of products, purchasing durable goods, maximising the period of use and minimising waste (criteria 5, 6, 7, 8, 14, 19, 20, 41, 42, 43, 71, 73, 79, 80, 82). Supply chain management including green sourcing of food (criteria 83, 84).
2. Identify supply chain environmental hotspots, considering the entire value chain, and to identify relevant control points (e.g. product selection, avoidance, green procurement, supplier criteria) that can be used to minimise the environmental impact over the value chain.	
Destination managers	
1. Establish a unit or organisation responsible for the strategic sustainable development of the destination that coordinates relevant departments to implement specific actions within the framework of a Destination Plan.	M General requirements In order to apply for the eco-label, the applicant must comply with Community, national and local legal requirements. In particular, it shall be guaranteed that: 1. The physical structure is built legally and respects all relevant laws or regulations of the area on which it is built, especially any related to landscape and biodiversity conservation. 2. The physical structure respects Community, national and local laws and regulations regarding energy conservation, water sources, water treatment and disposal, waste collection and disposal, maintenance and servicing of equipment, safety and health dispositions. 3. The enterprise is operational and registered, as required by national and/or local laws and its staff are legally employed and insured. M 24. Policy setting and environmental program The management shall have an environmental policy and shall draw up a simple environmental policy statement and a precise action program to ensure the application of the environmental policy. The action program shall identify targets on environmental performance regarding energy, water, chemicals and waste, which shall be set every two years, taking into consideration the optional criteria and the data collected where available. It shall identify the person who will act as the environmental manager of the tourist
2. Monitor the state of biodiversity within the destination, and to implement a biodiversity conservation and management plan that protects and enhances total biodiversity within the destination through, for example, development restrictions and compensation measures.	
3. Ensure that environment-related services within the destination, especially water supply, wastewater treatment, waste management (especially recycling measures) and public transport/traffic management, are sufficient to cope with peak demand during tourism high season in a sustainable manner.	
4. Monitor the environmental impact of large events, and environmental management plans for such events that avoid and mitigate impacts, such as the provision of additional public transport to the event, the provision of good waste management facilities, and the offsetting of carbon and biodiversity impacts.	

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
The most important actors and environmental aspects identified for the tourism sector.	Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).
	<p>accommodation and who is in charge of taking the necessary actions and reaching the targets. The environmental policy shall be available for consultation by the public. Comments and feedback from guests collected by means of a questionnaire or check list shall be taken into account.</p> <p>M 25. Staff training The tourist accommodation shall provide information and training to the staff, including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour.</p>
Tour operators	
BEMP for tour operators	<p>This is outside the scope of the EU Ecolabel criteria which is for TAS/CSS rather than for tour operators. However, the Ecolabel criteria does cover the following aspects which look at travel options and other wider environmental impacts:</p> <p>M 22. Public transportation Information shall be made easily available to the guests and staff on how to use public transportation to and from the tourist accommodation through its main means of communication.</p> <p>O 77. Bicycles (1,5 points) Bicycles shall be made available to guests.</p> <p>O 78. Pick up service (1 point) The tourist accommodation shall offer guests travelling with public transport pick up service at arrival with environmentally friendly means of transportation such as electric cars or horse sleds.</p>
Accommodation water consumption	
<p>1. Undertake a water consumption audit and monitor water consumption across key water-consuming processes and areas (i.e. sub-metering) in order to identify efficiency improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection, including during housekeeping.</p>	<p>M 27. Energy and water consumption data The tourist accommodation shall have procedures for collecting and monitoring data on overall energy consumption (kWh), electricity and other energy sources consumption (kWh), and water consumption (litres). Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as consumption per overnight stay and per m² of indoor area. The tourist accommodation shall report the results yearly to the Competent Body that assessed the application.</p> <p>O 89. Energy and water meters (1 point)</p>
<p>2. Install efficient water-fittings, including low-flow spray taps and low-flow thermostatic-controlled showers, low- and dual-flush WCs, and waterless urinals. In the interim, aerators may be retro-fitted to existing fittings.</p>	<p>M 11. Water flow from taps and showers The average water flow of the taps and shower heads, excluding kitchen and bath tub taps, shall not exceed 9 litres/ minute.</p> <p>M 13. Urinal flushing</p>

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
The most important actors and environmental aspects identified for the tourism sector.	Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).
	<p>All urinals shall be fitted with either automatic (timed) or manual flushing systems so that there is no continuous flushing.</p> <p>O 52. Water flow from taps and shower heads (1,5 points) Not exceed 8litres/minute</p> <p>O 53. WC flushing (1,5 points) Consume 6 litres/full flush, or less</p> <p>O 61. Water saving urinals (1,5 points)</p>
3. Minimise laundry requirements through green procurement of bedclothes and towels (in terms of size, density, colour, material), and by requesting or encouraging guests to reuse bedclothes and towels. Best practice is also to train staff on the implementation of water- and chemical-efficient cleaning methods, and to procure environmentally certified consumables for bedrooms and bathrooms.	<p>M 14. Changing towels and sheets</p> <p>Guests shall be informed of the environmental policy of the tourist accommodation on their arrival. This information shall explain that sheets and towels in the rooms shall be changed on their request, or by default at the frequency established by the environmental policy of the tourist accommodation or requested by law and/or national regulations. This applies only to tourist accommodations where the service includes the provision of towels and/or sheets.</p>
4. Procure the most water- (and thus energy-) efficient washing extractors and the most energy efficient driers (e.g. heat-pump driers) and ironers, to reuse rinse water and, in high-water-stress areas, main wash water following micro-filtration. Best practice is also to recover heat from waste water and exhaust ventilation air.	<p>O 43. Energy efficient appliances</p> <p>(d) (1 point): All household washing machines shall be of class A energy efficiency as laid down in Commission Directive 95/12/EC (3).</p> <p>(f) (1 point): All electric tumble driers shall be class A energy efficiency as laid down in Commission Directive 95/13/EC (6).</p> <p>←O 55. Washing machine water consumption (1 point)</p>
5. Select an efficient laundry service provider that is certified by an ISO Type-1 ecolabel or that complies with criteria in such labels (e.g. Nordic Ecolabelling, 2009), or to ensure that on-site large-scale laundry operations comply with such criteria.	<p>Currently there are no EU Ecolabel criteria for laundry services, although this is a possible future candidate for criteria development. However, the EU Ecolabel does consider on-site laundry, which is covered by the following criteria:</p> <p>O 55. Washing machine water consumption (1 point)</p> <p>O 60. Indications on water hardness (up to 2 points) In laundry areas to allow better use of detergents by guests</p> <p>O 63. Detergents (up to 3 points) At least 80% by weight of hand dishwashing detergents and/or detergents for dishwashers and/or laundry detergent and/or all-purpose cleaners and/or sanitary detergents and/or soaps and shampoos used by the tourist accommodation shall have been awarded the Community eco-label or other national or regional ISO Type I eco-labels.</p>
6. Optimise the frequency and timing of backwashing based on pressure drop rather than fixed schedules, to use ozonation or UV treatment and careful dosing control to minimise chlorination, and to recover heat from exhaust ventilation air.	<p>O 37. Heat recovery (up to 1,5 points) The tourist accommodation shall have a heat recovery system for 1 (1 point) or 2 (1,5 points) of the following categories: refrigeration systems, ventilators, washing machines, dishwashers, swimming pool(s), and sanitary waste water.</p> <p>O 66. Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (1 point)</p>

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
The most important actors and environmental aspects identified for the tourism sector.	Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).
	The swimming pool shall have an automatic dosage system that uses the minimum amount of disinfectant for the appropriate hygienic result (1 point). Or The swimming pool shall be of the ecological/natural type (1 point).
7. Install a grey water recovery system that recovers grey water for use in indoor processes (e.g. toilet flushing) following treatment or exterior processes (e.g. irrigation), or a rainwater collection system that uses rainwater for indoor purposes.	O 50. Use of rainwater (2 points) and recycled water (2 points)
Waste management	
1. Prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps, shampoos) and by buying cleaning agents in concentrated and bulk form – and by careful management of procurement volumes.	M 19. Disposable products Unless required by law, disposable toiletries (not refillable) such as shampoo and soap, and other products (not reusable), such as shower caps, brushes, nail files, etc. shall not be used. Where such disposable products are requested by law the applicant shall offer to guests both solutions and encourage them with appropriate communication to use the non-disposable products. Disposable drinking systems (cups and glasses), plates and cutlery shall only be used if they made out of renewable raw materials and are biodegradable and compostable according to EN 13432. M 20. Breakfast Packaging Except where required by law, no single dose packages shall be used for breakfast or other food service, with the exception of dairy fat spreads (such as butter, margarine and soft cheese), chocolate and peanut butter spreads, and diet or diabetic jams and preserves. O 71. Disposable drink containers (2 points)
2. Provide separated waste collection facilities throughout the establishment, to ensure that there is a clear procedure for staff waste separation, and to contract relevant recycling services at least for glass, paper and cardboard, plastics, metals and organic waste.	M 17. Waste separation by guests Guests shall be informed how and where they can separate waste according to the best local or national systems within the areas to which the tourist accommodation belongs. Adequate containers for waste separation shall be available in the rooms or in easily reachable distance. M 18. Waste separation Waste shall be separated into the categories that can be handled separately by the local or national waste management facilities, with particular care regarding hazardous waste, which shall be separated, collected and disposed of as listed in Commission Decision 2000/532/EC (1) and appropriate disposal shall be sought. This list includes toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances as specified in Directive 2002/96/EC (2) and Directive 2002/95/EC of the European Parliament and of the Council (3).
3. Where wastewater is not sent to a centralised wastewater treatment plant is to install an on-site wastewater treatment system that treats wastewater at least to secondary, and preferably to tertiary, level.	M 15. Correct waste water disposal The tourist accommodation shall inform guests and staff on the correct use of the waste water discharge, in order to avoid the disposal of substances that might prevent waste water treatment in accordance with the

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
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	municipal waste water plan and Community regulations. Where a waste water plan from the Municipality is not available, the tourist accommodation shall provide a general list of substances that shall not be disposed of with the waste water according to the Directive 2006/118/EC of the European Parliament and of the Council (1).
Accommodation energy	
1. Undertaken an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficient improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection.	<p>M 27. Energy and water consumption data The tourist accommodation shall have procedures for collecting and monitoring data on overall energy consumption (kWh), electricity and other energy sources consumption (kWh), and water consumption (litres). Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as consumption per overnight stay and per m² of indoor area. The tourist accommodation shall report the results yearly to the Competent Body that assessed the application.</p> <p>M 23. Maintenance and servicing of boilers and air conditioning systems Maintenance and servicing of boilers and air conditioning systems shall be carried out at least yearly, or more often if so required by law or need, by appropriately qualified professionals, following CEI and national standards where these apply, or according to the manufacturer's instructions.</p> <p>O 89. Energy and water meters (1 point)</p>
2. Ensure that new buildings are compliant with the highest achievable energy ratings, as indicated by conformance with PassiveHouse and Minergie P standards, and that existing buildings are retrofitted to minimise heating and cooling energy requirements.	<p>M 5. Energy efficiency of buildings The tourist accommodation shall comply with the national legislation and local building codes related to energy efficiency and the energy performance of buildings.</p> <p>O 39. Energy performance audits for buildings (1,5 points)</p>
3. To minimise energy consumption from HVAC systems by installing zoned temperature control and controlled ventilation with heat recovery (ideally controlled by CO ₂ sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics.	<p>M 3. Efficiency and heat generation If a new heat generating capacity is installed within the duration of the eco-label award, it shall be a high efficiency cogeneration unit (as defined by Article 3 and Annex III of Directive 2004/8/EC of the European Parliament and of the Council (1), a heat pump or an efficient boiler. In the latter case, the efficiency of such a boiler shall be of 4 stars (ca. 92% at 50 °C and 95% at 70 °C), measured according to Council Directive 92/42/EEC (2), or according to relevant product norms and regulations for those boilers not covered by this Directive.</p> <p>M 4. Air conditioning Any household air conditioner bought within the duration of the eco-label award shall have at least Class A energy efficiency as laid down in Commission Directive 2002/31/EC (4), or have corresponding energy efficiency.</p> <p>O 41. Automatic switching-off of air conditioning and heating systems (1,5 points) ← O 42. Bioclimatic</p>

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
The most important actors and environmental aspects identified for the tourism sector.	Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O). architecture (3 points)
4. To install efficient (e.g. ecolabelled) heat pumps for heating and cooling, or where possible ground water cooling.	O 36. Heat pump (up to 2 points)
5. To install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural-light and time.	M 9. Energy efficient light bulbs (a) At least 80% of all light bulbs in the tourist accommodation shall have an energy efficiency of Class A as defined in Commission Directive 98/11/EC (3). This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs. (b) 100% of light bulbs that are situated where they are likely to be turned on for more than five hours a day shall have an energy efficiency of Class A as defined by Directive 98/11/EC. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.
6. To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier.	M 1. Electricity from renewable sources At least 50% of the electricity used for all purposes shall come from renewable energy sources, as defined in Directive 2001/77/EC of the European Parliament and of the Council (1). O 30. Generation of electricity through renewable energy sources (up to 4 points) O 31. Energy from renewable energy sources (up to 2 points)
Kitchens	
1. Assess food and drink supply chains to identify environmental hotspots and key control points, including choice editing of menus to avoid particularly damaging ingredients (e.g. some out of season fruit), and selection of environmentally-certified products.	O 83. Local food products (up to 3 points) O 84. Organic food (up to 2 points)
2. To minimise avoidable food waste by careful menu development and portion sizing, and to ensure that all organic waste is separated and send for anaerobic digestion where available, or alternatively incineration with energy recovery or local/on-site composting.	O 70. Composting (up to 2 points)
3. To select efficient washing equipment, including trigger-operated low-flow pre-rinse spray valves, efficient dishwashers and connectionless steamers, and to monitor and benchmark water consumption in kitchen/restaurant areas.	O 43. Energy efficient refrigerators (1 point), ovens (1 point) dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (1 point) – (maximum of 3 points) O 54. Dishwasher water consumption (1 point) O 55. Washing machine water consumption (1 point)
4. To select efficient cooking equipment, including induction-hob or pot-sensor-controlled gas ovens, efficient refrigeration equipment that uses a natural refrigerant such as ammonia or carbon dioxide, and to control ventilation according to demand.	O 43. Energy efficient refrigerators (1 point), ovens (1 point) dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (1 point) – (maximum of 3 points) O 45. Refrigerator positioning (1 point) To reduce energy waste
Campsites (EU Ecolabel criteria for Camp site services)	
1. To provide guests with interactive on-site education of environmental issues,	M 27. Information to guests

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
<p>The most important actors and environmental aspects identified for the tourism sector.</p> <p>including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles).</p>	<p>Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).</p> <p>The campsite shall provide information to the guests, including conference participants, on its environmental policy, including safety and fire safety aspects, inviting them to contribute to its implementation. The information conveyed to the guests shall refer to the actions taken on behalf of its environmental policy and provide information about the Community eco-label. This information shall be actively given to the guests at the reception, together with a questionnaire covering their views about the environmental aspects of the campsite. Notices inviting guests to support the environmental objectives shall be visible to the guests, especially in the common areas and the rental accommodation.</p> <p>O 82. Environmental communication and education (up to 3 points)</p>
<p>2. To maximise on-site biodiversity through planting of native species, installation of green or brown roofs and walls, and to minimise water consumption for irrigation and light pollution arising from outdoor lighting (e.g. through use of correctly-angled low-pressure sodium lamps).</p>	<p>O 81. Roof landscaping (2 points)</p> <p>O 71. Insect and pest repellents (up to 2 points)</p> <p>Kept to a strict minimum or not used</p> <p>O 70. Organic gardening (2 points)</p> <p>O 63. Indigenous species used for new outdoor planting (1 point)</p> <p>O 50. Automatic switching off outside lights (1,5 points)</p> <p>O 51. Use of rainwater (2 points) and recycled water (2 points)</p> <p>O 52. Automatic watering systems for outside areas (1,5 points)</p> <p>To optimise watering times and water consumption</p>
<p>3. To minimise energy consumption for water-heating, HVAC and lighting through installation of low-flow fittings, good building insulation, and fluorescent or LED lighting, and also to install on-site renewable energy generating capacity (e.g. solar water heating).</p>	<p>M 5. Energy efficiency of buildings</p> <p>The campsite shall comply with the national legislation and local building codes related to energy efficiency and the energy performance of buildings</p> <p>M 6. Window insulation</p> <p>All windows in heated and/or air conditioned rooms and common areas shall have appropriate degree of thermal insulation according to the local regulations and climatic conditions and shall provide an appropriate degree of acoustic insulation.</p> <p>M 9. Energy efficient light bulbs</p> <p>M 11. Water flow from taps and showers</p> <p>The average water flow of the taps and shower heads excluding bath tub taps, kitchen taps and filling stations shall not exceed 9 litres/minute.</p> <p>O 31. Generation of electricity through renewable energy sources (up to 4 points)</p> <p>O 42. Automatic switching-off of air conditioning and heating systems (1,5 points)</p>
<p>4. To minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs.</p>	<p>O 57. Tap water temperature and flow (1 point)</p> <p>O 56. Washing machine water consumption (1 point)</p> <p>O 55. Dishwasher water consumption (1 point)</p> <p>O 54. WC flushing (1,5 points)</p> <p>O 53. Water flow from taps and shower heads (1,5 points)</p>

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
The most important actors and environmental aspects identified for the tourism sector.	Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).
5. To minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting water recycling services.	<p>M 18. Waste separation by guests - Guests shall be informed how and where they can separate waste according to the best local or national systems within the areas to which the campsite belongs. Adequate containers for waste separation shall be as easily reachable as general waste bins.</p> <p>M 19. Waste separation - Waste shall be separated into the categories that can be handled separately by the local or national waste management facilities, with particular care regarding hazardous waste, which shall be separated, collected and disposed of as listed in Commission Decision 2000/532/EC (1) and appropriate disposal shall be sought. This list includes toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances as specified in Directive 2002/96/EC of the European Parliament and of the Council (2) and Directive 2002/95/EC of the European Parliament and of the Council (3).</p> <p>M 15. Correct waste water disposal - The campsite shall inform guests and staff on the correct use of the waste water discharge, in order to avoid the disposal of substances that might prevent waste water treatment in accordance with the municipal waste water plan and Community regulations. Where a waste water plan from the Municipality is not available, the campsite shall provide a general list of substances that shall not be disposed of with the waste water according to the Groundwater Directive 2006/118/EC of the European Parliament and of the Council (1).</p>
6. The installation of, or conversion of an existing pool to, a natural pool.	O 68. Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (1 point)

Annex II Points allocation for current and updated criteria

Criterion Reference	Criterion Description	CURRENT	Updated criterion reference	Updated criterion	UPDATED	
Energy	31	Renewable electricity generation	4	26	On site self-generation of electricity through renewable energy sources	4
	32	Energy from renewable sources	2	27	Heating energy from renewable energy sources	2
				28	Procurement of labelled electricity	2
	33	Boiler energy efficiency	1.5	29	Efficient space and water heating appliances	1.5
	34	Boiler NOx	1.5	30	Water Based Space Heater NOx emissions	1.5
	35	District heating	1.5	31	Efficient heating generation	4
	36	Cogeneration	1.5			
	37	Heat pump	2	32	Heat pump	3
	38	Heat recovery	1.5	33	Heat recovery	3
	39	Thermoregulation	1.5	34	Thermoregulation	3
	40	Energy performance audit	1.5		-----	-
	41	Air conditioning	2	35	Efficient air conditioning appliances	2
	42	Automatic switching-off of air conditioning and heating systems	1.5	36	Automatic switching-off of air conditioning and heating systems	1.5
	43	Bioclimatic architecture	3		-----	-
	44	Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumbler and office equipment	3	37	Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumbler and office equipment	4
	45	Hand driers with sensors	2		-----	-
	46	Refrigerator positioning	1		-----	-
	47	Automatic switching off lights in tourist accommodation	1.5	38	Automatic switching off lights and household air conditioners in tourist accommodation	1.5
	48	Sauna timer control	1		-----	
	49	Swimming pool heating with renewable energy sources	1.5	39	Swimming pool heating with on-site renewable energy sources	1.5
50	Automatic switching off outside lights	1.5	40	Automatic switching off outside lights	1.5	
	Total energy	36.5			36	
Water	51	Use of rainwater and recycled	4	41	Use of alternative water sources	4
	52	Automatic watering systems for outside areas	1.5	42	Efficient irrigation	1.5
	53	Water flow from taps and showerheads	1.5	43	Water flow from taps and shower heads	3
	54	WC flushing	1.5	-	-----	-
	55	Dishwasher water consumption	1	44	Dishwasher water consumption	2
	56	Washing machine water consumption	1	45	Washing machine water consumption	2
	57	Tap water temperature and flow	1		-----	-
	58	Shower timers	1.5		-----	-
	59	Swimming pool cover	1	46	Swimming pool cover	1
	60	de-icing	1.5		-----	-
	61	Indication on water hardness	2	47	Indication on water hardness	2

Criterion Reference		Criterion Description	CURRENT	Updated criterion reference	Updated criterion	UPDATED
	62	Water saving urinals	1.5	48	Water saving urinals and toilets	3
	63	Indigenous species outdoor planting	1		-----	-
	-	-----	-	49	Swimming pool backwashing	2
	Total water		20			20.5
Detergents and disinfectants	64	Detergents	3	50	Detergents and toiletries	3
	65	Indoor and outdoor paints and varnishes	2	-	-----	-
	66	Car washing in special areas (campsite only)	1*	-	-----	-
	67	Alternative BBQ lighters	1	-	-----	-
	68	Swimming pools: Dosage of disinfectants or natural/ecological swimming pools	1	51	Swimming pools: Dosage of disinfectants or natural/ecological swimming pools	2
	69	mechanical cleaning	1		-----	-
	70	Organic gardening	2	52	Organic gardening	2
	71	Insect and pest repellents	2	53	Insect and pest repellents	2
	detergents and disinfectants		12 (13)			9
Waste	72	Composting	2	54	Composting	4
	73	Disposable drinks containers	2	55	Beverage provision	3
	74	Fat/oil disposal	2		-----	-
	75	Run-off from car parks (campsite only)	1*		-----	-
	76	Used textiles, furniture and other products	3	56	Used textiles, furniture and other products	3
	Total waste		9 (10)			10
Other services	77	Regulation of campsite traffic (campsite only)	1*	57	tourist accommodation traffic management	2
	78	Campsite generated traffic (campsite only)	1*			
	79	Trolleys for guests (campsite only)	1*		-----	-
	80	Unsealed surfaces (campsite only)	1*	58	Unsealed surfaces (campsite only)	1*
	81	Roof landscaping	2	59	Roof and façade landscaping	2
	82	Environmental communication and education	3	60	Environmental and social communication and education	3
	83	No smoking	1.5	61	No smoking in rooms	1.5
	84	Bicycles	1.5	62	Bicycles	1.5
	85	Pick up service	1		-----	-
	86	refillable bottles	3		-----	-
	87	Use of rechargeable products	2	63	Rechargeable products	2
	88	Paper products	3	64	Paper products	2
	89	Durable goods	3	65	Durable goods	5
	90	Local food products	3	66	Local products	3
	91	Organic food	3	67	Organic food	3
92	indoor air quality	4		-----	-	
Total other services		30 (34)			25 (26)	

Criterion Reference		Criterion Description	CURRENT	Updated criterion reference	Updated criterion	UPDATED
General Management	93	EMAS or ISO registration	3	68	EMAS or ISO registration of the tourist accommodation	7
	94	Suppliers EMAS or ISO registered	1.5	69	EMAS registration or ISO certification of suppliers	4
	95	Subcontractors comply with mandatory criteria	4	70	Compliance by subcontractors with mandatory criteria	4.5
	96	Energy and water meters	2	71	Energy and water meters	2
	97	Additional environmental actions	3		-----	
	Total general management			13.5		
Total Campsite			127			119
Total Tourist Accommodation			121			118

*exclusive criteria for campsite services.

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Annex III Stakeholder comments during and after First Ad Hoc Working Group

Criterion	Stakeholder Comment	JRC IPTS response
Mandatory criteria related to energy	<p><i>We see that Energy criteria are not stringent enough and Energy is the most important environmental hot spot. We think to set thresholds on the overall energy consumption is very important.</i></p>	<p>No change Energy consumption gives rise to one of the key environmental impacts of Tourist Accommodation. Our approach has been to focus on obtaining energy from renewable sources as far as possible, use of energy efficient appliances and encourage energy management practices. It would be difficult to set thresholds per guest night because of a) the varying climatic conditions across Europe and beyond, b) variations according to seasons, c) the different facilities offered e.g. swimming pools etc. and d) the age of the building structures. Looking at other labels e.g. Travelife, the approach is to benchmark similar hotels located in the same geographic area and offering the same facilities. Further, the level of ambition has been raised by requesting high percentage of green electricity procurement among other updates. (See section 2.1.1)</p>
	<p><i>Text says: "General feedback suggests that this criterion can be difficult to achieve, especially for small businesses which tend to be sensitive to energy price changes."</i></p> <p><i>We think that this reaction is related to a slow implementation of the European directives with regard the electricity market. It is true that in many countries, 'switching' (both to another supplier and to another electricity product) is still a rather unknown concept. As a result there is little competition. And special products offered by the de facto monopolist can be considered as 'expensive'.</i></p> <p><i>The European ecolabel cannot take the incomplete implementation of the market as a starting point. Rather contrarily, has to activate consumers to make use of their rights.</i></p> <p><i>About the prices: At international level, Guarantees of Origin of green electricity are traded for prices 05 cents to about 1 euro (for quality products). This is between 1 promille and 1 percent of the electricity price. Arguing that this brings 'companies sensitive to energy price changes in trouble' is very questionable</i></p> <p><i>In the tourist accommodation sector, the costs for electricity are relatively low as compared to total turnover. For that reason, the hotel sector is often amongst the first movers when it is about green electricity.</i></p> <p><i>Hotels also actively communicate about their use of green energy. We have to use this dynamics to set a next step.</i></p>	<p>Updated criteria See rationale and updated criteria</p> <p>1. Procurement of electricity from a renewable electricity supplier (section 2.1.1.1).</p> <p>31. On site self-generation of electricity through renewable energy sources (section 2.1.7.1).</p> <p>32. Procurement of labelled electricity (section 2.1.7.2).</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<p>"The best environmental practice for electricity from renewable sources is "To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier."</p> <p>In this instance, the EU Ecolabel refers directly to procuring green electricity (from a genuine renewable electricity supplier). The current EU Ecolabel criterion is therefore in line with this best practice guidance.</p> <p>We agree with the starting point (install onsite generation capacity, and procurement from genuine (verifiable additional) renewable electricity supplier).</p> <p>We do not agree with the second sentence. The current EU ecolabel does not refer to 'genuine renewable electricity supplier'. This word has no legal meaning. It definitely does not refer to additional' elements, a word which is used in the first sentence. Currently, only ecolabels are a way to prove additionality.</p> <p>Please, do not hesitate contacting us for further clarifications on our comments on green electricity.</p>	
Criterion 1: Electricity from renewable sources	<p>It should be discussed to remove the derogation for TAS which does not have access to renewable electricity. The conclusion in the BEMP is that best practice is to install "on-site" installations and since this is available to all, no derogation is needed.</p>	<p>No change</p> <p>See further research on 'Derogation "no access" to a market that offers electricity generated from renewable energy sources' under the section 2.1.1.1.</p>
	<p>A stakeholder expressed that is the most difficult criterion and that applicants pay more electricity.</p>	<p>No change</p> <p>See further research on 'Price of 100% green electricity' under the section 2.1.1.1.</p>
	<p>A stakeholder (Tourist Accommodation) claimed that there is an issue on the assessment as Competent Bodies ask for only one contract and there are applicants that have two contracts, one for the habitual supplier and another for the green electricity supplier.</p>	<p>We suggest that the User Manual accepts that electricity may be supplied by more than one company and therefore all contracts should be provided.</p>
	<p>A stakeholder stated the European ecolabel cannot take the incomplete implementation of the market as a starting point but it has to go ahead and to activate consumers. Concerning the cost issue, they mentioned that difference average is less than 1%. They support 100% content as there are many suppliers on the market that can provide 100% with guarantee of origin. Concerning the reference to ecolabelled electricity, they remarked that this electricity brings additional value e.g. use of pesticides. They remarked that ecolabelled electricity is accessible to all European countries.</p>	<p>Updated criteria</p> <p>See rationale and updated criteria</p> <p>1. Procurement of electricity from a renewable electricity supplier (section 2.1.1.1).</p> <p>31. On site self-generation of electricity through renewable energy sources (section 2.1.7.1).</p> <p>32. Procurement of labelled electricity (section 2.1.7.2).</p>
	<p>A stakeholder (Competent Body) proposes the removal of the derogation (criterion exemption where Not availability on the market) and if not possible to set a mandatory on site generation requirement.</p>	<p>No change</p> <p>See further research on 'Derogation "no access" to a market that offers electricity generated from renewable energy sources' under the section 2.1.1.1.</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<i>One stakeholder (Competent Body) remarked that Not access to market derogation is very important for hotels outside EU; however other CB expressed that in this case we should also consider they are the best, and not stating that something is not available.</i>	No change See further research on 'Derogation "no access" to a market that offers electricity generated from renewable energy sources' under the section 2.1.1.1.
	<i>Stakeholder from consumer organisation supports the removal of the derogation and they advocate for 100% renewable energy. They mentioned that the added value of Ecolabelled electricity. They would appreciate further information on this.</i>	Updated criteria See rationale and updated criteria 1. Procurement of electricity from a renewable electricity supplier (section 2.1.1.1). 31. On site self-generation of electricity through renewable energy sources (section 2.1.7.1). 32. Procurement of labelled electricity (section 2.1.7.2).
	<i>A stakeholder claimed that stringency levels will be dependent on how green we want the Ecolabel to be. If is something to only the very greenest hotels or we want to encourage as many as possible. In this issue JRC stated that normally 10-20% is targeted as a general philosophy of the EU Ecolabel.</i>	In general the ambition level of the revised criteria has been increased, especially for electricity procurement, water environmental hot spots and social criteria.(See section 2.2)
	<i>It was remarked that it will be important defining if the percentage is in relation to rooms or to units. If is by rooms, 100% green energy is probably not an option. When targeting a percentage it will be important to specify if we speak about the number of hotels or the proportion of room spaces.</i>	It is proposed that this is clarified at the User Manual. Criterion relates to the total electricity consumption over a period of 12 months, so that consumption across all the seasons of the year is captured.
	<i>In Bulgaria there is not access to green electricity providers.</i>	No change See further research on 'Derogation "no access" to a market that offers electricity generated from renewable energy sources' under the section 2.1.1.1.
	<i>We have to be very careful with this point, because the TA has to buy the renewable energy source certificates. And sometimes, we have complaints with that, because there is no return on investment. It is consider as a merchant point.</i>	No change See further research on 'Price of 100% green electricity' under the section 2.1.1.1.
	<i>Should it be possible (or be encouraged) to refer to ecolabelled electricity?</i> <i>Only to refer, but not to oblige. It's too restrictive.</i>	Updated criteria See rationale and updated criteria 32. Procurement of labelled electricity (section 2.1.7.2).
	<i>Renewable energy sources shall mean renewable non-fossil sources namely wind, solar, aero thermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.</i> <i>Are the coming energies from waste reception centre and hydro dam accepted?</i>	No change Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources only covers electricity generated from organic, non-fossil material of biological origin and which comprises wood and wood waste, municipal solid waste and the renewable part of industrial waste. Therefore not all energy from waste. 'Hydro dam' sounds like

Criterion	Stakeholder Comment	JRC IPTS response
		hydroelectricity, which is within the scope of this definition.
	<p><i>How should 'no access to a market' be defined?</i></p> <p><i>If there's a national market but physically the electricity cannot be brought to the accommodation grounds, there it means that there no access.</i></p>	<p>Updated criteria</p> <p>The criterion has been reworded to be more specific: '...no access to a national supplier that offers electricity generated from renewable energy sources.'</p> <p><i>Assessment and verification: ...In case the tourist accommodation have no access to a national supplier that offers electricity from renewable energy sources, documentation on the domestic suppliers operating at national level has to be supplied</i></p> <p>[See further research on 'Derogation "no access" to a market that offers electricity generated from renewable energy sources' under the section 2.1.1.1.]</p>
	<p><i>Should it be possible (or be encouraged) to refer to ecolabelled electricity?</i></p> <p><i>Yes it would be advisable to encourage it.</i></p>	<p>Updated criteria</p> <p>See rationale and updated criteria 32. Procurement of labelled electricity (section 2.1.7.2).</p>
	<p><i>Should the self-generation of energy be addressed in mandatory criteria 1: Electricity from renewable sources?</i></p> <p><i>Not necessary; Criterion 1 is fulfilled and so is Criterion 31.</i></p>	<p>Updated criteria</p> <p>See rationale and updated criteria 1. Procurement of electricity from a renewable electricity supplier (section 2.1.1.1). 31. On site self-generation of electricity through renewable energy sources (section 2.1.7.1). 32. Procurement of labelled electricity (section 2.1.7.2).</p>
	<p><i>"At least 50 % of the electricity used for all purposes shall come from renewable energy sources, as defined in Directive 2009/28/EC [OJ L 140, 5.6.2009, p.16] of the European Parliament and of the Council."</i></p> <p><i>In my view, this is quite unfair that companies engaged in environment have to pay more for green electricity. They already pay to get certified, it is like a double punishment.</i></p>	<p>Updated criteria</p> <p>See rationale and updated criteria 1. Procurement of electricity from a renewable electricity supplier (section 2.1.1.1). 31. On site self-generation of electricity through renewable energy sources (section 2.1.7.1). 32. Procurement of labelled electricity (section 2.1.7.2).</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>"At least 50 %"</i></p> <p><i>Too low - should be at least 80%</i></p>	<p>Updated criteria</p> <p>See rationale and updated criteria</p> <p>1. Procurement of electricity from a renewable electricity supplier (section 2.1.1.1).</p> <p>31. On site self-generation of electricity through renewable energy sources (section 2.1.7.1).</p> <p>32. Procurement of labelled electricity (section 2.1.7.2).</p>
	<p><i>Main suggestion: refer ecolabelled renewable electricity: We suggest to reformulate the first line to at least 100% of the electricity used should be renewable and certified by an independent third party certification scheme. The origin of the electricity has to be proven by renewable energy sources, as defined in Directive 2009/28/EC of the European Parliament and of the Council. OR, alternatively at least 100% of the electricity used should be renewable and certified by an independent third party certification scheme. The origin of the electricity has to be proven by renewable energy sources, as defined in Directive 2009/28/EC of the European Parliament and of the Council.</i></p>	<p>Updated criteria</p> <p>See rationale and updated criteria</p> <p>1. Procurement of electricity from a renewable electricity supplier (section 2.1.1.1).</p> <p>31. On site self-generation of electricity through renewable energy sources (section 2.1.7.1).</p> <p>32. Procurement of labelled electricity (section 2.1.7.2).</p>
	<p><i>e.g. In the ecological criteria for the award of the EU Ecolabel for copying and graphic paper: Where virgin fibres are used, the product shall be covered by valid forest management and chain of custody certificates issued by an independent third party certification scheme, such as PEFC, FSC or equivalent. If the product or product line includes uncertified material, proof should be provided that the uncertified material is less than 50% and is covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.</i></p>	<p>Updated criteria</p> <p>See rationale and updated criteria</p> <p>32. Procurement of labelled electricity (section 2.1.7.2).</p>
	<p><i>1. There is no reason to limit the green electricity consumption to 50%. This should be 100%: On all European markets where suppliers are offering green electricity, they can easily offer 100% green electricity. The 50% limit does not make sense. We hardly know examples of companies selling 50% green electricity contracts. It is either 100%, or unspecified.</i></p> <p><i>2. (i.e. the exception for accommodation that have no access to markets): We understand the reasoning behind this rule, but for background information: if the territory scope of the European ecolabel is the EEA, this shouldn't be an issue. All European suppliers are able to supply green electricity. If not from own production, via the Guarantees of Origin system. (Yes, even in Malta they can do that! If Iceland is allowed to export its GO's, Malta is allowed import them). There may be a problem on overseas territories or in neighbouring countries willing to use the European ecolabel. But the problem is not unovercomable. e.g. The Greenhouse Gas Protocol accepts on such markets other tracking instruments, if the seller can prove that double counting is avoided. E.g. I-REC certificates (International RECs).</i></p> <p><i>3. The exception is also formulated very general. In practice there several ways to 'get around' a fixed</i></p>	<p>Responded above</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<i>term contract. Suppliers can upgrade existing contracts, sellers can go for an unbundled purchase,... Maybe changing this text is not a priority. And it may become difficult to distinguish cases in which there is an alternative from cases in which there are no alternatives. However, we wanted to report this comment too.</i>	
	<i>The word "contract" without the terminal "s" can let understand that only one only contract is taken into consideration. In the Directive 2009/28/EC, chapter 52, it's clearly noted that some warranties of origin can be provided. If we both have one contract which provide (for example in France) 12% of "green" energy and 88% of "non-green" energy", It can be economically interesting to be able to by "38% with the warranties of origin.</i>	We suggest that the User Manual accepts that electricity may be supplied by more than one company and therefore all contracts should be provided.
	<i>How should 'no access to a market' be defined?</i>	Responded above
	<i>To my opinion the market should be the "European" market. If we consider the "ShMile" project, it could be hard to understand that a Mediterranean country can comply with this criterion because of the national market. My point of view is the same for the island : they can by warranties of origin on the European market</i>	
	<i>Should it be possible (or be encouraged) to refer to ecolabelled electricity?</i>	Responded above
	<i>No because the criterion is not "fair" since the beginning if we can prove that we by some warranties of origin or some specific contract providing green electricity, it is IMPOSSIBLE for our provider to prove we receive only "green electron". Since it is not fair, we must allow EE TAS to choose their own way to comply the criterion</i>	
	<i>Should the self-generation of energy be addressed in mandatory criteria 1: Electricity from renewable sources?</i>	No change
	<i>No. If I imagine an island or a Mediterranean country which hasn't access to a national market...If this TAS is a hotel, located in a building in the centre of a capital city. It's impossible to set up solar panels if the hotel has no roof (sometimes, the hotel only owns some floors). It's also impossible to use wind energy or biomass...So as I said before, the best would be to speak about "European market"</i>	Self-generation remains as optional requirement.
Criterion 2: Coal and heavy oils	<i>Stakeholders are invited to provide additional information concerning to the access to low sulphur grade heating oil supply.</i>	No change
	<i>We have to be careful with asking for technical information, because it's not always easy to obtain for the TA</i>	There was little stakeholder feedback before and after the meeting. The proposal was to leave the criterion unchanged and there is no reason to alter it.
Criterion 3: Efficiency and	<i>Should wood boilers be included in this criterion?</i>	Updated criteria
	<i>Yes, we should</i>	Proposed criterion cover wood boilers.

Criterion	Stakeholder Comment	JRC IPTS response
heat generation	<i>How should the criterion be updated to reflect this change?</i>	See rationale and updated criteria 3. Efficiency and heat generation (section 2.1.1.3)
	<i>It's necessary to take into account the changes, but Both systems should be accepted.</i>	
	<i>Should wood boilers be included in this criterion?</i>	
	<i>No</i>	
	<i>How should existing licence holders (with 3 Star boilers or equivalent) - be treated when a change in regulation which means all new boilers are letter rated (A+ to F) and a higher efficiency is expected?</i>	
	<i>May be we should write an equivalence table (in the user manual)</i>	
	<i>Yes we need heating with wood , is important in the rural zone</i>	
	<i>A stakeholder (Competent Body) claimed that wood boilers are more environmentally friendly than others. However an efficiency rate on 98% might be too demanding for wood boilers. Another CB expressed to be in favour to use the whole ecolabel criteria set for heating systems for new appliances instead of pick 1 or two criteria form the Ecolabel for heaters.</i>	No change The criterion could be modified to require only EU Ecolabelled water based space heating systems. This may have a positive "demand pull" effect for those heating systems, however this is a mandatory criterion and there are currently none available on the market. We need to recognise that all the tourist accommodation mandatory criteria have to be met before the award of an EU Ecolabel can be made.
	<i>The criteria document for Water based heating system should be regarded as a whole – one cannot take only one parameter to determine the best technology. Some technologies have a good performance when considering the seasonal space heating efficiency but not when considering for example GWP. We suggest including all relevant parameters from the criteria document. And perhaps add a criterion and give point if the installation is Ecolabelled.</i>	
Criterion 4: Air conditioning	<i>For clarity, please make a table listing the classes required for each type of air conditioner.</i>	Updated criteria Table included. See updated criteria 4. Air conditioning (section 2.1.1.4)
	<i>We can use the energy efficiency coefficient (COP) of cooling devices to define a compliance threshold for Air to water devices, or appliances with a greater power than 12kW, which are very common in the hotel industry. Such a threshold is for example found in the attribution rules of CEE in France (see attachment).</i>	In order to avoid difficulties, especially on verification, it is proposed to harmonise this criterion with the scope of Commission Delegated Regulation (EU) No 626/2011 of 4 May 2011 supplementing Directive 2010/30/EU of European Parliament and of the Council with regard to energy labelling of air conditioners.
Criterion 5: Energy efficiency	<i>Since the Ecolabel does not ask for anything more stringent than the law, maybe it is better to remove this criterion.</i>	Updated criteria Energy audits are environmental hotspot. Internal audits are

Criterion	Stakeholder Comment	JRC IPTS response
of buildings	<i>Concern was raised regarding the cost of certification. By industry was seen as a big issue since it can cost 5.000-10 000 € per building (TA might have a several buildings). Several stakeholders (Tourist Accommodation) expressed that to comply with current criteria they have technical explanation and certification from architect. They remarked that there might be problems with old buildings. They claimed that if certification is finally requested, many licences will be lost due to increase on cost.</i>	<p>proposed to circumvent the high costs associated to third party audits. See rationale and updated criteria 5. Energy performance internal audits for buildings(section 2.1.1.5)</p>
	<i>A stakeholder (Competent Body) highlighted that there is a contradiction between criteria text and the assessment and verification. 'The text of the criterion: comply with national legislation and local building codes related to energy efficiency. Verification: says something completely different meaning that energy certification has to be carried out, it is not easy understandable which text you have to follow'.</i>	
	<i>A stakeholder (consumer organisation) claimed that if there is no certification or audit, but only has compliance with national legislation, what is the purpose of the criterion then. Especially considering that energy efficiency this is one of the main aspects identified.</i>	
	<i>A stakeholder (Competent Body) expressed that in some countries is a legal obligation that all public building need to have certification and hotels might be considered public. However other CBs stated that in their countries there is not a legal obligation for hotels.</i>	
	<i>The results of an energy audit</i>	
	<i>An energy audit is a far more important investment and involvement than a simple regulation compliance. The old buildings will be greatly disadvantaged by this criterion. It will participate to the idea a lot of hotels have: old buildings cannot obtain the label without heavy investments.</i>	
	<i>Should this criterion require energy certification under Directive 2010/31/EU or the results of an energy audit?</i>	
	<i>IMPOSSIBLE to comply for a campsite... on my campsite... we would have to perform... 250 diagnostics (one for each building/Mobil home or chalet). If you consider 1000€ for each diagnostic... think about the global price...</i>	
<i>Should this criterion require energy certification under Directive 2010/31/EU or the results of an energy audit?</i>	<p>With the aim to simplify the criteria and due to the difficulty to specify appropriate degree of insulation or equivalent to double glazing it is proposed to remove this criterion. However, in the proposed criterion 5 which is proposed to be more stringent proposes the use of EN 16247-2:2014 Energy</p>	
<i>No because to ask for an audit is too expensive for a TA. And the TA already have to check and "follow" its energy consumption</i>		
Criterion 6: Window insulation	<i>"All windows in heated and/or air conditioned rooms and common areas shall have appropriate degree of thermal insulation according to the local regulations and climatic conditions and shall provide an appropriate degree of acoustic insulation. (This does not apply to rental caravans/mobile homes where these are not owned by the tourist accommodation management.)"</i>	

Criterion	Stakeholder Comment	JRC IPTS response
	<i>Be careful, the TA will no ask for a thermal study. It's too expensive.</i>	audits - Part 2: Buildings which cover the building envelope aspects (renovation of windows, added insulation, etc.). These aspects shall be checked annually and a recommendation has to be implemented depending on the results obtained.
	<i>We agree with the proposed changes. Just to clarify, what would be an example for "equivalent"?</i>	
	<i>It is suggested to have the User manual to define appropriate degree of thermal insulation. This should done in the criteria document since the UM does not have any legal status. Perhaps a combination of climate zone and U-value could be used?</i>	
Criterion 8: Switching off lights	<i>A stakeholder (association) made a general comment related to criteria on automatic switching off. They expressed that there is a lot about automated switching off devices and these devices are expensive to install. They find that staff training (having standardized procedures) often is good or more efficient than asking guests to switching off lights.</i>	Updated criteria See rationale and updated criteria 7. Switching off lights (section 2.1.1.8)
	<i>This criterion can become mandatory for new rooms added after the acquisition of the label. Because it's not very expensive to set up (whereas the n°7 is very expensive and mustn't become mandatory).</i>	No change The criterion is mandatory for all rooms in the accommodation.
Criterion 9: Energy efficient light bulbs	<i>Is it a requirement that Competent Bodies verify compliance with this criterion after two years or is the declaration of conformity sufficient?</i> <i>The TAS shall be asked by the Competent body to prove his compliance with the criterion</i>	Updated criteria Text: <i>The tourist accommodation shall provide to the competent body a two written reports ... First and second reports shall be provided within a maximum of 1 and 2 years respectively from the date of the award.</i> See rationale and updated criteria 8. Energy efficient light bulbs (section 2.1.1.9)
	<i>"At least 80%"</i> <i>Too low? - at least 90%</i>	No change See rationale and updated criteria 8. Energy efficient light bulbs (section 2.1.1.9)
	<i>This proposal is mixing up a request for LED lamps and energy efficient lamps. We suggest only requesting energy efficient lamps and hence leaving it up to applicant to choose which technology is being used. Referring to the table below (taken from the latest technical document in the revision of Lamps) we suggest setting the level to minimum A+ (which de facto is asking for LED lamps). The transition time should also be revised to be no longer than one year.</i>	Updated criteria According to Lighting Europe, A+ non-directional lamps will include the best LEDs, compact and linear fluorescent lamps and for directional lamps only LEDs. If we do increase the requirement from A to A+ then we may be creating a significant amount of waste and we should not lower the transition period from 2 years. Specific mention of LED is omitted as LED lamps are included on the scope of the Regulation (EU) No 874/2012. It is

Criterion	Stakeholder Comment	JRC IPTS response
		proposed to require at least class A instead of a prescriptive class A, this would allow higher efficient classes to be used. See rationale and updated criteria 9. Energy efficient light bulbs (section 2.1.1.9)
	<p><i>How is it possible to be sure that energy efficiency class is A when the label is not available anymore?</i></p> <p><i>We would change the criterion allowing in general low impact bulbs and class A when substituting exhausted lamps</i></p>	<p>Updated criteria</p> <p>Specific mention of LED is omitted as LED lamps are included on the scope of the Regulation (EU) No 874/2012. It is proposed to require at least class A instead of a prescriptive class A, this would allow higher efficient classes to be used. See rationale and updated criteria 8. Energy efficient light bulbs (section 2.1.1.9)</p>
	<p><i>Is it a requirement that Competent Bodies verify compliance with this criterion after two years or is the declaration of conformity sufficient?</i></p> <p><i>If CB need to verify after 2 years it would be impossible for us.</i></p>	<p>Responded above.</p>
	<p><i>A stakeholder (Competent Body) expressed their aim to provide further written comments concerning this criterion. They remarked that 2 years phase in period is reasonable; however after first proposal stakeholders may know what the proposal is going to be so they can start changing light bulbs now. So they will end up having 4 years transitional period which the stakeholder thinks is very much. They suggested reducing the transition period or to reword criteria by adding 'all new installations should fulfil this requirement'. They highlighted that if there is a criteria which sets some kind of documentation after two years it is important to specify when the two years starts, if it is from the adoption of criteria document on when the licence is given. They mentioned that if it is the second option, there will be differences from some applicants to others posing an extra burden on CBs.</i></p> <p><i>The documented plan shall also be provided.</i></p>	<p>Responded above.</p>
	<p><i>We think that the declaration of conformity should be sufficient. It's very difficult for the CB to control that at the end of both years.</i></p>	<p>Updated criteria</p> <p>It is proposed to include the documented plan at the verification section. See rationale and updated criteria 8. Energy efficient light bulbs (section 2.1.1.9)</p>
	<p><i>Stakeholder from consumer organisation stated that it is not clear if this criterion will oblige to change for example CFL before the end of life. They support the LED but they expressed concern related to the change of lamps before it reach the end of life.</i></p>	<p>Updated criteria</p> <p>It is proposed to require at least class A, this would allow higher efficient classes to be used. To have a progressive implementation would allow to not wasting a lot lamps before they reach their end of life.</p>

Criterion	Stakeholder Comment	JRC IPTS response
		See rationale and updated criteria 8. Energy efficient light bulbs (section 2.1.1.9)
	<p><i>Is it a requirement that Competent Bodies verify compliance with this criterion after two years or is the declaration of conformity sufficient?</i></p> <p><i>Yes, we control that point every two years during the audit or we ask to the TA to provide us the updated information</i></p>	Responded above.
	<p><i>I think that we need no inspection but declaration</i></p>	Responded above.
	<p><i>"At least 50%"</i></p> <p><i>Can we put a little bit more?? Like 75%? These bulbs are a huge source of consumption ... so maybe on the part of the criterion we need to be stricter.</i></p>	<p>Updated criteria</p> <p>It is proposed to require at least class A, this would allow higher efficient classes to be used. To have a progressive implementation would allow to not wasting a lot lamps before they reach their end of life.</p> <p>See rationale and updated criteria 9. Energy efficient light bulbs (section 2.1.1.9)</p>
Criterion 10: Outside heating appliances	<p><i>Which option is preferred? (note that 4 stakeholders have commented on this – 2 favour Option 1, and 2 favour Option 2.)</i></p>	<p>Option 2 Accepted</p> <p>The opinion of stakeholders was evenly divided before the technical background report was published (2 vs 2) but no arguments have been advanced in favour of Option 1 in these comments.</p> <p>The arguments in favour of Option 2 are based on a) a waste of energy b) alternatives being available e.g. blankets and c) image incongruence - how do you explain to guests that it is sustainable to use outside heating appliances.</p>
	<p><i>Option 2 please... the 1st one is amazing on an environmentally friendly TAS</i></p>	
	<p><i>Which option is preferred</i></p>	
	<p><i>Option 2</i></p>	
	<p><i>No outside heating appliances shall be used by the tourist accommodation.</i></p>	
<p><i>We prefer option 2.</i></p>		
<p><i>I Prefer option one</i></p>		
<p><i>I am in favour of option 2. This might just be a minor point looking at the overall issue of sustainability in tourism accommodation, however having an outside heating system, for me, does not present a picture of a sustainable tourist accommodation. (On many terraces of hotels and cafés one can find blankets during the periods of the year where the weather is colder - this is already a very ecological alternative).</i></p>		

Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>Which option is preferred? (note that 4 stakeholders have commented on this – 2 favour Option 1, and 2 favour Option 2.)</i></p> <p><i>Option 1 : we never met this case</i> <i>Option 2 : we support this idea of recommending not outside heating</i></p> <p><i>Two stakeholders (Tourist Accommodation) expressed their preference for option 2. No outside heating appliances shall be used by the tourist accommodation.</i></p> <p><i>Outside heating is a waste of energy – also if the energy is coming from renewable energy sources. We strongly support alternative 2.</i></p>	
	<p><i>An onsite visit shall be made mandatory within the life time of the license. We would prefer this will take place before a license is given but for practical reasons this is not always possible. Many of the criteria is only possible to verify by such an audit.</i></p>	<p>Updated criteria Text: <i>This will be checked during the on-site visit.</i></p>
Criterion 11: Water flow from taps and showers	<p><i>Do you agree that an average maximum water flow for taps and showers be set (as for the existing criterion)?</i></p> <p><i>Yes</i></p>	<p>Updated criteria Several licence holders highlighted the impracticalities considering the proposed wording and that the values are very stringent especially if it are not considered in average form. It is then proposed to keep the current criterion wording. However the limit has been decreased to 8 litres/minute in order to increase the ambition level compare to current requirement and reflecting best practices. See rationale and updated criterion: 10. Water flow from taps and showers (section 2.1.2.1)</p>
	<p><i>The limit of 8 litres is not suitable for showers and taps. For the taps, we can limit the flow to 4 or 5 litres per minutes without compromising the customer comfort. For the showerheads : we already tried to limit it to 8 or 9 litres per minutes, but with equipment like rain showers (very large showerheads) the flow cannot be less than 10 to 12 litres to function properly.</i></p>	
	<p><i>We think the explicit values should be included in the criterion.</i></p>	
	<p><i>We think the explicit values should be included in the criterion</i></p>	
	<p><i>We support completely this comment. Required flows should be clearly stated in the criteria description. Distinct limitations for taps and showerheads would be more appropriate. We advise hotels to use 4-5 litres for taps, between 8 and 12 litres/mins for showerheads according to their equipment.</i></p>	
	<p><i>Do you agree that the maxima and minima be explicitly quoted in the criterion?</i></p> <p><i>YES. In general we would set the average value at 8 l/min.</i></p>	
	<p><i>With regard to criterion 11: Water flow from taps and showers and 13: Urinal flushing, several stakeholders (TA) expressed concern related to the thresholds. They need higher values in order to reach the average due to problems with pressure of the water. They claimed that guests complaint for that there is not water pressure enough for shower. For the urinal flushing they expressed that cleaning lady will flush double if the water is not enough.</i></p>	

Criterion	Stakeholder Comment	JRC IPTS response
	<p>A stakeholder (association) mentioned that they did a survey of 50 hostels in Europe and the average they found for those who had water saving devices on their shower was 10 litres. They suggested that 8L is perhaps too low. Concerning urinal flushing they expressed the need to think how many litres the urinal should flush and the frequency of timing devices rather than just specify timers. They remarked that staff training is important for compliance.</p>	<p>Responded above A licence holder mentioned that 8 litres/minute threshold could be reachable if considered in average form.</p>
	<p>Several CBs suggested consider two parts; a maximum limit for existing devices and requiring that new ones should comply with EU ecolabel criteria. Regarding satisfaction surveys they claimed that customers that have to understand that they are in ecolabelled accommodation.</p>	
	<p>We would like to underline the problems raised when discussing the final criteria on sanitary tap ware (November 2012, EUEB): "potential difficulties linked with the limited water flow rates raised by several MS: as regards hygiene, water stagnation (FR, ES), the overall functioning of the sewage system (FR), consumer comfort and possible costs for tourist accommodations in case of an integration of these criteria in the tourist accommodation criteria (AT)"</p>	
	<p>Besides the current proposal for revised criterion is too complex to understand for TA</p>	
	<p>I added that we have a maximum capacity</p>	
	<p>We agree that an average maximum of 8l/min water flow should be set.</p>	
	<p>Do you agree that an average maximum water flow for taps and showers be set (as for the existing criterion)?</p>	
	<p>No, too difficult to measure.</p>	<p>Updated criteria It is proposed to revert to current wording.</p>
	<p>Do you agree that the maxima and minima be explicitly quoted in the criterion?</p>	
	<p>Yes, so is much clearer.</p>	<p>Updated criteria For the current criterion the information on flow measuring is included on the user manual. It is suggested to do the same</p>
	<p>It's IMPOSSIBLE to comply this maxima and minima for 2 reasons :1/ If you have a huge campsite (of an hotel located on higher floors) you need the have a more important flow next to the water source in order to have a correct (only "correct") flow at the end of the TAS. 2/ When on a campsite you use individual gas boiler, under a certain flow, the boiler doesn't start... so we need to have a more important flow at the end of the campsite to comply it. For example, you will find attached my personal data showing that we must have some high values</p>	
	<p>"Relevant documentation including an explanation on how the tourist accommodation fulfils the criterion."</p>	<p>Updated criteria For the current criterion the information on flow measuring is included on the user manual. It is suggested to do the same</p>
	<p>Could you explain how to evaluate the flow? See the file attached. If I evaluate the flow considering</p>	

Criterion	Stakeholder Comment	JRC IPTS response
	<i>my tap on "hot water" position, my flow is 7.45L/min. If I evaluate the flow considering my tap on "cold water" position, my flow is 10.53L/min. If I evaluate the flow considering the average of these 2 values... I have 8.99L/min. If I evaluate the flow considering my tap on the middle position you will find another value...</i>	for this revised proposal.
Criterion 12: Waste bins in toilets	<i>Title: Waste Bins in toilets and bathroom. Text of the criterion Each toilet and each bathroom have an appropriate waste bin and the guest shall be invited to use the waste bin instead of the toilet / bath for the appropriate waste=> If the bathroom is separate from the toilet; a waste bin needs to be installed in each one! Most of the guests take the waste bin in the toilet to put it in the bathroom...</i>	No change We understand that to use the bath as a waste receptacle is not a common practice.
	<i>It should be stated that the waste bin should not be used for waste that can be differentiated, but only for non- differentiated In many accommodations, guests throw differentiated waste in the bins of the bathroom.</i>	Reword Assessment and verification section: <i>"Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate documentation regarding the information to the guests. <u>"Appropriate waste" is non-recyclable waste. If the waste can be recycled it should be placed in the appropriate container in the main room or as directed by the accommodation provider.</u>"</i>
	<i>Several stakeholders (TA) mentioned that they have separate toilets/bathrooms and that many customers take the bins from toilet to bathroom. They suggested that could be a solution to put in both places.</i>	See above We think it is not needed to have more than one bin for the appropriate waste. The important thing here is that wastes are not inappropriately flushed down the toilet and that any recyclable waste is disposed of in the correct receptacle.
Criterion 13: Urinal flushing	<i>We suggest rewording the criterion to only allow urinals which are either EU Ecolabelled or water free.</i>	No change The tourism criteria could be used as a means to generate demand for EU Ecolabelled products. However this would be suitable for optional criteria as for mandatory would be very restrictive. There are no EU Ecolabelled urinals on the market.
Criterion 14: Changing towels and sheets	<i>"Criterion 14 (update): New proposal: Changing towels and sheets. Guests shall be informed of the environmental policy of the tourist accommodation on their arrival. This information shall explain that washing sheets and towels gives rise to a significant environmental burden due to use of energy, water and detergents, and that sheets and towels will only be changed in the rooms on their request, or by default at the frequency established by the environmental policy of the tourist accommodation or requested by law and/or national regulations. " <i>This applies only to tourist accommodations where the service includes the provision of towels and/or sheets.</i></i>	Updated criteria The text related to guest/staff information the requirement has been added in mandatory criteria for staff training (see section 2.1.6.3) and information to guests (see section 2.1.6.4).

Criterion	Stakeholder Comment	JRC IPTS response
	<i>"On their request" is misleading; someone can interpret it as a call to ask for a change. We propose "will not be changed unless specifically requested".</i>	
Criterion 15: Correct waste water disposal	<i>No because it is an important step of the compliance to the label: TAS need to be informed about the environmental procedures around him.</i>	Updated criteria It is proposed that the criterion should remain, but be simplified by removing reference to a municipal waste water plan which, in many parts of Europe, is not available. Furthermore, the criterion should aim to educate guests and staff. However, with the aim being to simplify the criteria set, the requirement has been merged in mandatory criteria for Waste bins in toilets. The merged revised criterion has been renamed as Waste water management. (See section 2.1.2.2)
	<i>This criterion could be merged with criterion 16.</i>	
	<i>"If available, waste water plan and copies of the communication to guests and staff."</i>	
	<i>We suggest simplifying this criterion and consider only the communication to guests and staff.</i>	
	<i>Should this criterion be removed?</i>	
	<i>No, but it could be more useful to indicate a list of common substances that can't be thrown in sinks and toilets.</i>	
	<i>Municipalities willing to answer are very rare and often do not understand the requirement.</i>	
	<i>A stakeholder mentioned that the water directive is non familiar to customers. They suggested including a kind of guidance to make guests aware on what they should not dispose in toilet.</i>	
<i>OK to remove this criterion</i>		
<i>This criterion is technical but compels to get in touch with the local councillor in charge of water quality and thus raises awareness on the issue</i>		
Criterion 16: Chemical toilet disposal point (CDP) (campsites only)	<i>Applicable to campsites, a stakeholder (TA) suggested opening it to all types of TA.</i>	Updated criteria See rationale and updated criterion: 14. Chemical toilet disposal point (section 2.1.3.1)
	<i>Some resorts (actually qualified as a "TAS" and not a campsites) can host campers and campervans so it important no to limit the criterion for campsites.</i>	
Criterion 18: Waste separation by guests	<i>A stakeholder (TA) claimed that guests bring food and produce waste so their parameters are not right since is not their waste.</i>	Updated criteria and merged with criterion 19. <i>"Guests shall be informed how and where they can separate waste according to the best local or national systems within the geographic area in which the tourist accommodation is</i>

Criterion	Stakeholder Comment	JRC IPTS response
	<p>Another stakeholder asked to better reword the following text 'as minimum container in each floor-block' and claimed that for campsites where circulation is regulated there is an issue because waste truck cannot enter to the campsite.</p> <p>I'm OK for this criteria BUT if we cumulate this criteria with number 77 (optional) it is difficult for a campsite to have containers in "each block". In fact many campsites don't allow circulation into the camp... circulation including waste trucks. Can we imagine a criteria modification like "as a minimum, containers should be available on each floor and/or in each block of the tourist accommodation except if guest are invite to bring their waste on a single point according to traffic regulation rules"? (or something like that).</p> <p>"Guests shall be informed how and where they can separate waste according to the best local or national systems within the geographic area in which the tourist accommodation is situated. Adequate containers for waste separation shall be available in the rooms or within easy reach; as a minimum, containers should be available on each floor and/or in each block of the tourist accommodation."</p> <p>This criterion should be merged with criterion 19; it would simplify the application form.</p>	<p>situated. Adequate containers for waste separation shall be available in the rooms <u>or on each floor of the tourist accommodation</u>. <u>In the case of camp sites a container should be available at a single central point on the site.</u>"</p> <p>Updated criteria and merged with criterion 19.</p>
Criterion 19: Waste separation	<p>There was a general agreement on the fact that there is no sense to do waste separation in places where there is not a local waste management system.</p> <p>For locations where there is a local system a stakeholder (CB) claimed that adding a reference to the directive is not helping the CBs and applicants. They suggested that waste should be sorted in the fractions that are going to be demanded by the local authorities. Directive is implemented in the national system in different ways. CBs can check only what local authorities are asking. They suggested including extra information in an appendix in the user manual if necessary.</p>	<p>Updated criteria and merged with criterion 18</p> <p>"Waste shall be separated into the categories <u>as required by the local or national waste management facilities, with particular care regarding hazardous waste e.g. toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances.</u>" - improves clarity as national and local authorities have different ways of implementing the Directive.</p>
Criterion 20: Disposable products	<p>A stakeholder claimed that general exclusion of disposable products is not science based. They mentioned that TNO study compares porcelain and polystyrene cups and it concludes that disposable cups for drinking have the least environmental burdening.</p> <p>A stakeholder (TA) asked clarification on single use product definition (product one use or bottles that can be used 2 or 3 days?). They mentioned that in campsite there are special groups that ask to have those products. They provide bottles a bit bigger for few days.</p> <p>A stakeholder from consumer organization claimed that criteria takes BEMP scientific assessments as reference and ecolabel is not only science based but also expectation from consumers.</p>	<p>No change The BEMP indicates that the avoidance of single use products can reduce waste generation by tourist establishments.</p> <p>No change Single use refers to use by one or a number of guests sharing the same accommodation for a specified period i.e. a room, a tent, a caravan etc. Once used during a stay, the product has to be disposed of. This could be introduced at the User Manual.</p> <p>No change</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<p>Are the standard operations of private chains included in the term 'quality rating scheme'?</p> <p>We support the fact that quality rating scheme of hotel chains and brands should be included as they represent the global image and regulation of a network of hotels. EU Ecolabel and hotel chains won't benefit in being opposed on subjects as quality which is one of the most sensitive subject for hoteliers.</p>	<p>No change</p> <p>Further information can be provided in the User Manual but when "quality rating" systems are referred to in the draft criterion, we mean an independent third party accreditation scheme.</p>
	<p>We agree with this proposal. Disposable products should be available at the reception if not in the rooms.</p>	<p>No change</p>
	<p>We think this criterion should specify: 'on request at reception'. Do you agree with this proposal?</p> <p>YES. In addition, the reception should explain to guest why these items are on request</p>	<p>Updated criteria:</p> <p><u>"Guests should be informed of the environmental benefits of providing refillable/reusable products and reducing the use of disposable products"</u>. This addition then matches the Assessment & Verification requirement.</p>
	<p>Disposable towels in cartoon box should be excluded from the definition.</p>	<p>Updated criteria:</p> <p>It is proposed a partial alignment to Tripadvisor greenleaders scheme including the requirement on banning disposable food service items and removing the reference of renewable raw materials/biodegradable and compostable. Further, requirement on <u>disposable towels and disposable bedding</u> have been included as some hotel might use disposable towel and bedding items as mattresses protectors and this is not a best practice.</p> <p>See rationale and proposed criteria: 16. Single-use products (section 2.1.4.3)</p>
	<p>The following exceptions apply: 1. If there is a legal obligation to provide single use toiletries in the room. 2. Where it is a requirement of a quality rating scheme to provide single use toiletries i.e. to achieve or maintain a star rating.</p> <p>So point 2 means that a 4 stars hotel can decide whether to keep single use toiletries and another one not? Better to keep the availability on request and inform guests.</p>	<p>No change</p> <p>The BEMP indicates that the avoidance of single use products can reduce waste generation by tourist establishments.</p>
	<p>Products like shower caps can be used several times during a stay. It should be considered as a re-usable product. It is the same for a nail file, tooth brush kit, shoe shine, comb and so on.</p>	<p>No change</p> <p>Single use refers to use by one or a number of guests sharing the same accommodation for a specified period i.e. a room, a tent, a caravan etc. Once used during a stay, the product has to be disposed of.</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>Do you agree with this proposal?</i></p> <p><i>We agree to specify "on request at reception but with exceptions that should be justified by the TA</i></p> <p><i>What about automatic vending machines</i></p>	No change
	<p><i>"May be available on request"</i></p> <p><i>In my opinion, this is a step back. Leave as today</i></p> <p><i>Are the standard operations of private chains included in the term 'quality rating scheme'?</i></p> <p><i>No: legal obligations are enough.</i></p>	No change
	<p><i>"Single use products"</i></p> <p><i>Does "single use" mean "used only once"? This need to be clarified as "little bottles" of soap can stay in a room for 2 or 3 days</i></p>	Proposed rewording of criterion: <i>"Guests should be informed of the environmental benefits of providing refillable/reusable products and reducing the use of disposable products". This addition then matches the Assessment & Verification requirement.</i>
	<p><i>"The following exceptions apply"</i></p> <p><i>We can have a little problem on campsites in France. When we rent Mobil homes they are usually provided empty "no soap, no shampoos..." and there is no requirement of that on the star rating system. As we host most of the time families, they don't need this kind of product because they come for a week with their own toiletries. I have 2 kinds of problems with that : we sometimes host groups for 1 or 2 nights : coming with a bus (like a tour operator) or a group composed of many families coming for an event (like a festival or a fair nearby)... This kind of people CAN'T provide their own product because they expect for us the same kind of service they could find in an hotel... Could we introduce a special exception for groups (coming all together or coming for a special event?)</i></p>	Responded above
	<p><i>"The following exceptions apply"</i></p> <p><i>Can we introduce a comment like : "When an Ecolabelled (ISO Type 1) product exist on the national market on single use products, TAS need to use it"</i></p>	No change This is correct.
	<p><i>"The following exceptions apply:"</i></p> <p><i>The HUGE majority of the campsite use disposable drawsheets. It is important not to forbid this kind of drawsheets because when you have 150 or 200 check-in/check-out on the same day... it would be</i></p>	Updated criteria: Disposable items for food, towels and bedding would be allowed if are recycled by the service provider. This is to reflect that compostable or biodegradable are not greener per

Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>impossible to use washable drawsheets...(and that would use A LOT of water... and sometime need some chemicals like bleach to white is...) BUT can we add : If the TAS use disposable drawsheets, it must use valorisable material, follow an appropriate network for the valorisation and follow the consumption.</i></p>	<p>se unless they are connected to a treatment system. The applicant will ensure like this that the material is recycled.</p>
	<p><i>Are the standard operations of private chains included in the term 'quality rating scheme'?</i></p> <p><i>NO ! Because if you accept the standards operations of private chains... chains only have to write that disposable product are mandatory to be able to use it. If you decide to accept it, you also need to accept "standards operations of local associations" (like we can have in France on some areas (see... in French :</i></p>	<p>No change</p> <p>Further information can be provided in the User Manual but when "quality rating" systems are referred to in the draft criterion, we mean an independent third party accreditation scheme.</p>
Criterion 21: Breakfast packaging	<p><i>"The tourist accommodation shall manage the provision of food to guests to minimise both food and packaging waste."</i></p>	<p>Updated criteria</p> <p>It is proposed to keep the proposed criteria. The title has been modified to better reflect that the aim is to manage the waste derived from the food services. In order to reduce complexity concerning the verification, indicative examples of non-perishable or long life food products (e.g. condiments, seasoning, sugar, UHT milk) and perishable foods (e.g. yoghurt) could be included at the user manual. See rationale and proposed criteria: 17. Food service waste management (section 2.1.4.4)</p>
	<p><i>If you really want to change as proposed, the structure has to explain to the auditor and the client, and clearly on the basis of empirical data collected using scientific criteria, as is stated that eliminate the single-dose leads to increased food waste. Otherwise, best to leave it as is. Need to avoid giving a bad image, making believe that Ecolabel has gone back admitting the single-doses.</i></p>	
	<p><i>If yes, what would an appropriate measurement be?</i></p>	
	<p><i>LCA studies?</i></p>	
	<p><i>Perishable food is defined as being subject to decay or destruction, usually food that has been, for example minimally processed or not otherwise preserved and which relies on refrigerated storage in order to reduce the rate of decay and loss of quality (Codex Alimentarius).</i></p>	
	<p><i>In some TA there is no restaurant so the TA proposes automatic vending machines as a service.</i></p>	
	<p><i>What about automatic vending machines?</i></p>	
	<p><i>Several stakeholders welcomed the proposal however clarification between perishable and non-perishable was requested. However CBs see an issue on the assessment as most applicants can convince them of what they are doing. However they welcomed the idea behind and do not see other way to do it.</i></p>	
<p><i>An association stakeholder highlighted that limiting packaging can lead to a migration to the buffet which have much more of impact because of food waste.</i></p>		
<p><i>Change of name from breakfast packaging to food packaging?</i></p>		
	<p>Yes</p>	

Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>How should 'perishable food' be defined? Do you agree on the proposed definitions of perishable food?</i></p> <p><i>Yes, but tea bags and cocoa bags should be allowed.</i></p>	
	<p><i>How will Competent Authorities verify 'the documented procedure which outlines how both food and packaging waste are minimized? + How can we judge if the tourist accommodation has minimized both food and packaging waste in an acceptable way?' Is additional guidance required to explain this? If yes, what would an appropriate measurement be?</i></p> <p><i>Yes, it would be difficult for CB to verify this criterion. Maybe it is better to define a minimum number of guests below which yogurt or jam in single dose can be used.</i></p>	
	<p><i>"The tourist accommodation shall manage the provision of food to guests to minimise both food and packaging waste. To achieve this, the tourist accommodation shall follow a documented procedure which specifies how the food waste/packaging waste balance is optimised, dependent on the offer of the tourist accommodation"</i></p> <p><i>We agree with the perishable food definition from the "Codex Alimentarius". Concerning assessment and verification we don't see the need for such document procedure as we consider a detailed declaration of compliance enough.</i></p>	
	<p><i>How should 'perishable food' be defined? Do you agree on the proposed definitions of perishable food?</i></p> <p><i>The definition needs to be more precise. Maybe set a limit duration of conservation to separate clearly perishable and non-perishable because all products present a date of consumption. Or a classification by type of products in two categories perishables and non-perishables.</i></p>	
	<p><i>If yes, what would an appropriate measurement be?</i></p> <p><i>Yes it needs more guidance.</i></p> <p><i>Best practice examples, examples of quantities per day that allows bulk packaging or the number of breakfast served allowing bulk packaging... But it may differ according to the countries, because the products the most consumed won't be the same.</i></p>	
	<p><i>The in-room breakfast should allow some individual packaging because hygiene problems hotels can encounter when transporting the breakfast through the corridors. Customers often don't appreciate the breakfast being brought with an open bowl of soft white cheese for example, or mashed apples.</i></p>	
	<p><i>Yogurt is a very complicated product to get in bulk packaging in France. References are from Ukraine or Bulgaria, and very few farms propose it, because culturally, French don't eat yogurt in that kind of packaging. Plus, it is a very fragile fermented dairy product.</i></p> <p><i>Our hotels are very frightened to use yogurt in bulk conditioning even with a large number of</i></p>	

Criterion	Stakeholder Comment	JRC IPTS response
	<i>breakfast served.</i>	
	<i>We acknowledge the difficulty to find a compromise between packaging waste and food waste. But the suggested proposal is impossible to verify in a consistent manner. We should either stick with the old criteria to hinder the use of single packaging or we should reword the criteria and have a criteria that minimizes food waste.</i>	The proposed draft criterion will result in different outcomes in different establishments but that is acceptable because each provider's circumstances are different. Our overall aim is to reduce packaging waste but without at the same time creating food waste. This outcome will be achieved in different ways in different countries and in different tourist establishments.
Criterion 22: No smoking in common areas	<i>Which is the preferred option?</i>	Accept Option 3 Main support is for Option 3
	<i>Criteria tightened, we may even forbid smoking in all common areas and 50% of the rooms.</i>	
	<i>DK in favour of updating Criterion 22 (option 3) and option 2 of Criterion 83: No smoking in common areas and rooms</i>	
	<i>Which is the preferred option?</i>	
	<i>3. In case, allow the contrary; a smoking section shall be available in the premises.</i>	
	<i>A consumer organization stakeholder claimed that national regulation could be insufficient and they suggested amending option 3 to include some designated rooms for smoking or areas with appropriate ventilation.</i>	
	<i>No smoking in common areas</i>	
	<i>I Prefer number 2</i>	
	<i>No smoking in common areas</i>	
	<i>We prefer the second option.</i>	
<i>Which is the preferred option?</i>		
<i>Option 3: step forward</i>		
<i>Option 3 for me :)</i>		
Criterion 23: Public transportation	<i>Should the current criteria be modified by adding additional requirements for the provision of information regarding preferable means of transport from home to home? Why not... maybe it's not necessary to be as precise as the LCA literature. But I think it can be interesting to add a section about training the reception employees. Something like "the reception</i>	Updated criteria The criteria and title has been reworded to address several preferable means of transports including public

Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>employees can be able to provide information about home to home transportation".</i></p> <p><i>Should the current criteria be modified by adding additional requirements for the provision of information regarding preferable means of transport from home to home?</i></p> <p><i>Yes!</i></p> <p><i>Several stakeholders (TA) agree to present the different means of transportation to come/leave the hotel. They expressed that bike could be an option (in France there are public bikes everywhere). However they see an issue with car sharing. A consumer organization stakeholder supported criterion 23. They suggested making mandatory a shuttle service to the closest public transport or reduced transport price included taxi.</i></p> <p><i>Should the current criteria be modified by adding additional requirements for the provision of information regarding preferable means of transport from home to home?</i></p> <p><i>We don't agree. To inform is important, but It's not necessary to add more obligations</i></p>	<p>transportation. Additionally, it is proposed to request the provision of information of preferable means of transport from home to home which has been pointed out as an environmental hot spot by the LCA review.</p> <p>See rationale and proposed criteria: 19. Environmentally preferable means of transport (section 2.1.5.2)</p>
Criterion 24: Maintenance and servicing of boilers and air conditioning systems	<p><i>Can we include in the scope of this criterion the maintenance of devices which include frigorigen gas (like refrigerated storage areas)?</i></p>	<p>Updated criteria</p> <p>Regulation No 517/2014 applies to commercial refrigeration systems too.</p> <p><i>"Maintenance and servicing of boilers, air conditioning <u>and refrigeration systems</u> shall be carried out at least yearly, or more often if so required by law or need, by appropriately qualified professionals, following CEI and national standards where these apply, or according to the manufacturer's instructions. For air conditioning, refrigeration systems and heat pumps, the maintenance (check for leakage and repair) has to be carried out according Regulation (EU) No 517/2014 of the European Parliament and of the Council of 16 April 2014 on fluorinated greenhouse gases and repealing Regulation (EC) No 842/2006.</i></p> <p><i>For air conditioning systems, <u>refrigeration systems</u> and heat pumps, the maintenance (check for leakage and repair) has to be carried out according Regulation (EU) No 517/2014 of the European Parliament and of the Council of 16 April 2014 on</i></p>

Criterion	Stakeholder Comment	JRC IPTS response
		<i>fluorinated greenhouse gases and repealing Regulation (EC) No 842/2006”</i>
Criterion 25: Policy setting and environmental programme	<p><i>“The action programme shall identify targets on environmental and social performance.”</i></p> <p><i>So, many Tourist Accommodations get a target about the access for people who have different sorts of impairments (visual, physical, hearing or mental handicap). So they set up many facilities for these customers.</i></p> <p><i>It would be important to value these facilities because now all these people can get their vacation on these Tourist Accommodations.</i></p>	<p>No change</p> <p>Although the EU Ecolabel regulation allows for the introduction of social criteria where relevant, adding targets would seem to be going much further than required. Further, social policy against exploitation is proposed to be included at the social criteria. (see 2.1.5.4)</p> <p>With the aim to simplify the criteria set and that there is optional criterion on ISO14001 and EMAS CERTIFICATION it is proposed to delete this mandatory criterion and promote third party certification adding extra points at optional criteria.</p>
	<p><i>“Comments and feedback from guests collected by means of a questionnaire or check list shall be taken into account.”</i></p> <p><i>This sentence here is not relevant and should be moved to the end of the criterion “information to guests”.</i></p>	<p>No change</p> <p>This sentence is relevant as there may well be suggestions from guests about changes to environmental policies, their implementation and any improvements that may be required</p>
Criterion 26: Staff training	<p><i>Several TA stakeholders claimed that the training of housekeepers which are subcontracted is a problem. They said that they give to the subcontracted company a work process. They also mentioned that some employees are only few hours a week that might be difficult to complete the training.</i></p>	<p>No change</p> <p>Other stakeholder comments indicated how important staff training is in terms of implementing the policies and actions required by the EU Ecolabel criteria. However, it is proposed that the proposed criterion is not changed as it currently allows staff training to be carried out in varying degrees of detail as appropriate and encourages the use of manuals and documented procedures for part-time staff</p>
	<p><i>what this means for the operations of the tourist “accommodation”</i></p> <p><i>It can be really difficult for a TAS to train all the staff about all the aspects of the EU-E. I think about housekeeping staff in the campsites who are only working on Saturday or Sunday during the high season. For seasonal employees, it could be interesting to control maybe that every employee has been trained about what are the main lines of the E.E. on the TAS and what are the consequences of this label on THEIR job</i></p>	<p>No change</p> <p>The training areas set out in the proposed criterion can be carried out in varying degrees of detail. Part time staff can have less detailed training and greater reliance may be placed on procedures and manuals.</p>
	<p><i>A TA underlines that he is not authorized to train the staff of external companies</i></p>	<p>No change</p> <p>Where staff of external contracted companies are involved in the implementation and maintenance of the requirements of the EU Ecolabel criteria, their competence must be ensured via those same contracts. This should include some training,</p>

Criterion	Stakeholder Comment	JRC IPTS response
		whether by the TA provider or the external contractor.
Criterion 27: Information to guests	<i>Several TA stakeholders agreed that it is a good idea and some of the TA stakeholders are already doing these types of questionnaires</i>	No change
	<i>"Guests shall be given a questionnaire asking about (1) their views on these environmental aspects of the tourist accommodation and (2) general customer satisfaction with the facilities and services of the tourist accommodation."</i> <i>The questionnaire should be based on a set of formalized mandatory questions in order to provide data on a national and European scale, that can allow quantitative and qualitative analysis. I recommend that 3 to 5 questions, similar in all country with cautious tradition, should be asked by all stake holders to their clients (awareness of the label, sensitivity to the environmental issues, satisfaction on these environmental aspects of the tourism accommodation</i> <i>These questions should be included in any automatic electronic questionnaire sent to the client after his stay in order to measure his satisfaction.</i>	No change Not sure that this is necessary or possible. Each TA provider will have their own environmental policies and actions to implement them. These will reflect their unique circumstances. Further, we think it is not clear who will be responsible for collation of the quantitative data at the national and international level.
	<i>"Guests shall be given a questionnaire asking about (1) their views on these environmental aspects of the tourist accommodation and (2) general customer satisfaction with the facilities and services of the tourist accommodation. Notices inviting guests to support the environmental objectives and encouraging feedback on all aspects of the tourist accommodation shall be visible to the guests, especially in the common areas and the rooms. A clear procedure which records customer comments, complaints and corrective actions shall be in place. "</i> <i>Insert here the phrase "Comments and feedback from guests collected by means clustering of a questionnaire or check list Shall be taken into account", which is now included in the criterion "Environmental Policy".</i>	No change See comment above
	<i>Is this criterion really useful? Since it gathers others criteria like number 7, number 8, number 25... It could be included in number 25.</i>	No change Several TA stakeholders agreed that it is a good idea and some of the TA stakeholders are already doing these types of questionnaires
Criterion 28: Energy and water consumption	<i>"Per m²"</i> <i>Is this really relevant? For an accommodation, to know how much water, how much energy per guest night they use is interesting and relevant but not if it is calculated related to the surface, it doesn't mean anything.</i>	Reword and Merge Criteria 28 and 29: See rationale and updated criteria: 24. Data collection (see section 2.1.6.5)

Criterion	Stakeholder Comment	JRC IPTS response
data	<p><i>"The tourist accommodation shall report the results yearly to the Competent Body that assessed the application. "</i></p> <p><i>This criterion could be merged with number 29.</i></p> <p><i>How should 'indoor area' be defined for this criterion?</i></p> <p><i>It should be the heated or cooled indoor surface of the building.</i></p>	<p><i>"The tourist accommodation shall have procedures for collecting and monitoring data on overall energy consumption (kWh), electricity and other energy sources consumption (kWh), and water consumption (litres).</i></p> <p><i>Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as <u>consumption per overnight stay</u>.</i></p> <p><i>The tourist accommodation shall report the results yearly to the Competent Body that assessed the application."</i></p> <p>The point made is reflected in many other stakeholders' comments including the fact that it is not relevant for campsites.</p>
	<p><i>It could be interesting to create a specific tool (maybe linked to the helpdesk) to make mandatory for holders to report the 2 following data :</i></p> <ul style="list-style-type: none"> <i>- Consumption in kw/h and per m²</i> <i>- Consumption in litter and per m²</i> <p><i>That would be a great opportunity to realise statistics over holders all around Europe</i></p>	<p>No change</p> <p>This would require investment and is outside scope of the criteria revision.</p>
	<p><i>"and per m2 of indoor area."</i></p> <p><i>It can be difficult to realize the scope of the "indoor area" : does it include only the accommodation surface ? All the surface? If we consider the idea of making comparisons between all TAS, the definition should be clarified OR this information shouldn't be asked. Many of my colleagues don't understand it...</i></p>	<p>Responded above</p>
	<p><i>"Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as consumption per overnight stay and per m2 of indoor area."</i></p> <p><i>Data should be compiled on the helpdesk in order to provide national and European benchmarks. The figures of renewable energy produced, used or sold, should be also registered. It could be interesting to ask the accommodation to define annual targets of reduction in order to reach European energetic transition scheme.</i></p>	<p>No change</p> <p>This may be considered as part of the User Manual but is about the management of the help desk not the criterion.</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<p>To my opinion, this idea of indoor area needs to be deleted. Ex: on a campsite, if you change some mobile homes during winter... your indoor area can be modified whereas you still have the same hosting capacity...</p> <p>"Energy and water consumption data"</p> <p>Should be optional for small businesses or make it more friendly compiling with simpler interfaces. In the inspections, small businesses fail to put together the data except in a fictional way.</p>	<p>Responded above</p> <p>No change Although there may be some experience of difficulty in obtaining this data, most businesses will collect at least annual data. This is the way that costs are incurred and all businesses closely monitor their costs.</p>
Criterion 29: Other data collection	<p>"Other data collection "</p> <p>Should be optional for small businesses or make it more friendly compiling with simpler interfaces</p> <p>Several TA stakeholders welcomed the proposal on sorted waste measurement however they claimed that it might be difficult to measure in Kg and they normally count number of bins.</p>	<p>No change – See response above</p> <p>No change The UM could set out a means of converting bins to kg. Measuring one and multiplying that by the number of bins would seem to be a reasonable approach.</p>
	<p>An association stakeholder claimed that if measure is consistent then the unit used is not too important. They highlighted that what is important is that the business measures and compares week to week, year to year, etc...</p>	<p>No change Supported comment. The objective is to quantify the amount and encourage continuous improvement i.e. reduction in waste generated</p>
	<p>However a stakeholder (CB) claimed that unsorted waste is more important. In different countries you can get a bill for it and TA are able to show compliance any time. They expressed that unsorted waste is most important 'because it has not been reused and is where we have to take actions and thus this is where to focus'. They suggested having more flexible wording for the units.</p>	<p>Reword and Merge Criteria 28 and 29: See rationale and updated criteria: 24. Data collection (see section 2.1.6.5)</p>
	<p>"Sorted waste "</p> <p>The monitoring of sorted waste only is not coherent with our objective of reducing the environmental impact. Indeed, the unsorted wastes are the ones with the greater impact on the environment. The objective is to reduce that part of waste, by either better purchases, either better sorting. For us, it's more logical to measure the unsorted, or both unsorted and sorted.</p>	<p><u>"...consumption of chemicals expressed in kg and/or litres specifying if the product is concentrated or not and the quantity of all waste produced (litres and/or kg)."</u></p> <p>All waste has to be sorted as per previous criteria. Therefore there needs to be no reference to 'sorted' waste. The stakeholder comment refers to unrecyclable waste.</p>
		<p>"This tourist accommodation is actively taking measures to use renewable energy sources, save energy and water, to reduce waste, to improve the local environment. "</p> <p>This should not be a criterion, there is no point in keeping this here; it should be at the beginning or at the end but not in the environmental criteria to achieve the certification.</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<i>By this criterion, also require the use of the logo in the accommodation clearly visible on the website, on the letterhead and on any medium for information and communication with the outside. In the accommodation facilities, the possession of the Ecolabel is often too difficult to know because the logo is not used enough</i>	No change We want to encourage promotion but we do not require promotion for any other product group.
	<i>The internet site of the stakeholders should figure the European logo on the first page of the site and/or on the reservation page.</i>	No change See above
	<i>The stakeholder should promote the Ecolabel at the entrance (outside) or/and at the reception (inside) in order to inform the prospects / clients of the specific environmental engagement of the place.</i>	No change See above
	<i>The label should be next to the door or at least beyond the other labels visible outside and at reception.</i>	
Criterion 31: Generation of electricity through renewable energy sources	<i>Should the points allocation for the proposed criterion be adjusted?</i>	Updated criteria
	<i>Modify as follows: b) at least 20% of the overall electricity consumption per year (3 points) c) at least 40% of the overall electricity consumption per year (4 points).</i>	It is proposed to keep the criterion optional. Hopefully, the mandatory criterion will encourage some 'demand pull' for the generation of electricity from renewable sources and the optional criteria will reward those applicants who have invested in on-site generation. Further, the criteria title has been renamed in order to clarify that the aim of the criteria is to self-generate electricity from renewable energy, no matter if it is directly consumed or put into the grid that might be a usual practice in several countries. At the assessment and verification part it has been allowed that at the application date the data for the previous year might be valid for the calculation as this is a forecasting criterion. See rationale and updated criteria: 26. On site self-generation of electricity through renewable energy sources (section 2.1.7.1)
	<i>A stakeholder (TA) expressed that they implement solar panel in the hotel to heat the water. They proposed reflecting this in Criterion 31. JRC highlighted that this practice might be awarded in Criterion 32. Energy from renewable energy sources.</i>	
	<i>A stakeholder clarified that the current mandatory criterion (1) is about generation of electricity or buying, while additional criteria are about self-production of electricity (using and/or selling) (31) and thermal uses of energy that is completely different (32).</i>	
	<i>-JRC clarified that energy from renewable energy sources (32) has been widened to all purposes not only thermal to align to Criterion 1. It was remarked that threshold for the optional criterion are higher.</i>	
	<i>A stakeholder claimed that most hotels talk about energy in general what is electricity and the fuels. Criterion 31 refers to generation of electricity and then 32 is about energy. They asked to clarify that it refers to other type of energy to make absolutely clear that it is separated electricity and heating sources.</i>	
	<i>Confusion on the Criterion 31 regarding the possibilities of using or selling the energy. It was remarked and agreed by several stakeholders that the importance here is the production. Doesn't matter if it is sold or directly used once it is produced.</i>	
	<i>A Competent Body suggested addition buying 100% electricity from renewable sources. JRC claimed that the aim was to cover it on Criterion 32. If not reflected will be added.</i>	

Criterion	Stakeholder Comment	JRC IPTS response
	<p>A stakeholder (Tourist Accommodation) asked clarification on all purposes 'Is energy used to run cars, tracks included the scope?'</p> <p>"The tourist accommodation shall have on site renewable energy generation, which may include: photovoltaic (solar panel) or local hydroelectric system, geothermal, biomass or wind power electricity generation, that supplies or will supply."</p> <p>So, with the new criteria is that possible that the TAS "introduce into the grid a net amount of electrical energy produced from renewable energy sources", or is it for his own consumption only?</p> <p>Should this criterion be measured in terms of 'net amount of electrical energy produced from renewable energy sources?'</p> <p>No, we agree with the proposed changes</p>	
Criterion 32: Energy from renewable energy sources	<p>I don't like the wording "for all purposes". As we are not on a section about electricity, this wording imply to calculation ALL THE ENERGY used on the TAS (energy can be gas, electricity, gasoline...). How would you calculate your 70% if (for example): - I use gas to heat my swimming pool;</p> <ul style="list-style-type: none"> - I use 100% renewable electricity on the camp; - I have 3 diesel cars... As my criterion is "for all purposes" you will have to determine if I have enough "percentage" with my electricity to reach the 70%... Strange... What would be the common unity? If the problem is the compatibility with Criterion 49...then merge the 2 items :) 	<p>Updated criteria</p> <p>See rationale and updated criteria (section 2.1.7.2)</p>
Criterion 34: Boiler NOx emissions	<p>Water Based Space Heater NOx emissions: to measure the emission NOX is very difficult because it concerns only recent boilers and it's necessary to have specific equipment to measure it. We only have one licensee being able to measure and prove it.</p>	<p>Updated criteria</p> <p>It is proposed to introduce a table to guide on the emissions calculation for solid heaters.</p> <p>See rationale and updated criteria:</p> <p>30. Water Based Space Heater NOx emissions (section 2.1.7.4)</p>
Criterion 35: District heating	<p>A stakeholder (CB) expressed that in this criterion 2nd and 3rd points refer to directive and to the pipes. They suggested only awarding 1.5 points if applicant is using district heating and not considering the two other points which are difficult to verify. They suggested keeping criterion 38. Heat pumps but make it clear that is an EU Ecolabel heat pump.</p> <p>Should the points allocation for the proposed criteria be adjusted?</p> <p>2 points</p>	<p>Updated criteria</p> <p>It is then proposed to reallocate 0.5 point as suggested by stakeholders in this criterion in accordance to the difficulties and cost associated.</p> <p>Additionally, the text related to pipes connection has been deleted regarding the difficulties on verification.</p> <p>The criterion has been merged with current criterion 36.</p>

Criterion	Stakeholder Comment	JRC IPTS response
Criterion 36: Combined heat and power-cogeneration	<i>Should the point allocation for the proposed criteria be adjusted?</i>	Updated criteria Having into account that several optional criteria are proposed to be deleted in order to simplify a large criteria set and to focus in environmental hot spot a reallocation of a number of points is needed. It is then proposed to reallocate 0.5 point as there is a potential saving on primary energy consumption. The criterion has been merged with current criterion 35.
	<i>2 points for 2 categories</i>	
	<i>Should the point allocation for the proposed criteria be adjusted?</i>	
	<i>In favour of adding more points, in accordance to the cost of this type of equipment</i>	
Criterion 38: Heat recovery	<i>Should the point allocation for the proposed criteria be adjusted? In favour of adding more points, as we suggested, because is very difficult to fulfil it.</i>	Updated criteria The criterion shall remain as current requirement. Points awarded have been increased in order to recognise the relative high investment required to introduce heat recovery system and as it is a hot spot identified in BEMP.
	<i>Yes</i>	
Criterion 40: Energy performance audits for buildings	<i>Several stakeholders proposed to link it to mandatory criteria to have at least 1 auditing identifying energy savings.</i>	It is proposed to remove this criterion on the basis that its current formulation is not practical and it is felt that the revised proposed mandatory criterion to be ambitious enough.
	<i>A stakeholder (TA) claimed that they use a software which measure consumption and identifies the possible improvement potential. They do not see the need to have an audit to identify something they have already identified. It is an internal energy audit.</i>	
	<i>A CB suggested to award less points for internal and more for external.</i>	
	<i>A stakeholder (association) claimed that the Leadership in Energy and Environmental Design (LEED) system is much more widely used than Passivehaus. They expressed that is not that important to have or not an energy audit. Knowing how much tourist accommodation consumes and having a plan to know how they can improve the energy consumption is of higher relevance. Therefore, the critical thing is not an audit itself. They mention availability of software on the market.</i>	
	<i>Several CBs see a problem on forward looking assessment that always is going to be predictive. They mentioned that they never have seen applicants going for this criterion. 'It is always looking here for a forward commitment or are we looking backward, they have had audit on the past and they have acted on the recommended improvements'. They asked to clarify this.</i>	
	<i>Should the point allocation for the proposed criteria be adjusted?</i>	
	<i>3 points: big effort to reward</i>	

Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>It is suggested to award more points, as the audit can be costly: Should the point allocation for the proposed criteria be adjusted?</i></p> <p><i>OK</i></p> <p><i>Should the point allocation for the proposed criteria be adjusted?</i></p> <p><i>In favour of adding more points, as we suggested because the TAS has to pay an expensive audit and for small TAS is even more difficult.</i></p> <p><i>The applicant shall provide the energy performance audit report (each time it is undertaken) and provide detailed documentation on how the tourist accommodation has fulfilled this criterion. Documents relative to PassivHaus or Minergie P standards should be provided.</i></p> <p><i>There are European and national regulation related with this subject, so, we think that the audits must be done according this regulation. Besides, we have some tourist accommodation with an A energy performance and there is no much more to improve justifying an annual or biannual audit.</i></p>	
Criterion 43: Bioclimatic architecture	<p><i>With regard to Criterion 43. Bioclimatic architecture which was proposed to be deleted, a stakeholder pointed out that bioclimatic architecture it is not only about energy and they would like to retain it within the criteria set</i></p> <p><i>It is proposed that this criterion is removed?</i></p> <p><i>OK</i></p>	<p>No change</p> <p>Stakeholder comments divided. It was very difficult to verify this criterion and hence removal continues to be recommended. No specific mention to bioclimatic architecture in BEMP.</p>
Criterion 44: Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumblers and office equipment	<p><i>Is the A+++ energy efficiency class too stringent?</i></p> <p><i>Maybe, since there can be more than one fridge or washing machine etc., and since the substitution happens when the previous one breaks down, we can take into account the fact that among all the machines there can be minimum class A (or whatever class was set in the 2009 revision) up to class A+++.</i></p> <p><i>Is the A+++ energy efficiency class too stringent?</i></p> <p><i>Yes it's too stringent</i></p> <p><i>To my opinion A+++ is too stringent!</i></p>	<p>Updated criteria</p> <p>It is proposed to maintain the revised proposal but lowering the required energy class to A++ (or better) as requested by several stakeholders. It is still more ambitious than current criterion (Class A for most appliances) but it allow some flexibility requesting the 90% of the appliances instead of the totality of households, partially aligned to Greenleaders, to not produce unnecessary waste. As several criteria have been removed in order to simplify the criteria set, some points should be reallocated in other criteria in order to keep the scoring rules of the punctuation system. It is suggested to include extra points in this criterion as this is an environmental hot spot highlighted by BEMP.</p> <p>See rationale and updated criteria:</p>

Criterion	Stakeholder Comment	JRC IPTS response
		37: Energy efficient refrigerators (1 point), ovens (1 point) dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (maximum of 4 points) (section 2.1.7.14)
	<i>Several stakeholders (TA) raised concern about the cost of replacing all existing equipment. Furthermore other stakeholders see an issue on production of waste of equipment before its end of life. To consider the embedded energy in the machine was seen as an important issue. However they see difficulties on drawing a line to balance replacement vs waste. Regarding the cost issue a stakeholder (consumer association) claimed that investment is high at the initial stage but is recovered with the energy efficiency.</i>	No change Agree with this comment but this is an optional criterion. Further we have included that it should be the 90% of equipment, introducing certain flexibility to not produce unnecessary waste. This has been aligned to Greenleaders scheme.
	<i>A stakeholder (CB) proposed to merge the existing criteria with additional points for these higher classes.</i>	Responded above
	<i>A stakeholder (TA) proposed to have additional points for shops in campsites which have closed fridge.</i>	
	<i>A stakeholder (CB) suggested to award points for EU Ecolabel office equipment instead of Energy star.</i>	
	<i>A+++ energy efficiency:</i>	
	<i>We agree that A+++ energy efficiency class is too stringent now. Perhaps for the equipment that may be acquired.</i>	
	<i>At least 80%:</i>	
	<i>100% of those purchased in the last two years.</i>	
	<i>Why not 100%? Since this is a voluntary, we can take a step forward without risk.</i>	
Criterion 45: Electric hand and hair driers with proximity sensor	<i>Should we add the possibility of hairdryers that work only when the button is pressed?</i>	With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement.
Criterion 46: Refrigerator	<i>To avoid confusion, it is suggested that the information in the current User Manual for TAS and CSS is included directly in the criterion: Yes</i>	With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is

Criterion	Stakeholder Comment	JRC IPTS response
positioning	<i>Could you add an extra point for the refrigerators equipped with a plastic door in order to reduce the energy consumption?</i>	removed on the basis of its low environmental benefit and no specific BEMP guidance for refrigerator positioning.
Criterion 47: Automatic switching off lights in tourist accommodation	<i>A stakeholder suggested adding air conditioning to be switched off when guests leave the room.</i>	Updated criteria Introduce air conditioning to be switched off automatically when guests leave the room. <i>Automatic systems, which turn the lights <u>and household air conditioners off</u> when guests leave the room, shall be installed in 95% of the tourist accommodation</i>
Criterion 48: Sauna timer control	<i>A staff procedure: Usually, in inspections, we find that the procedure is only fictional... Delete it, and maintain only the timer.</i>	With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and no specific BEMP guidance sauna timer control.
Criterion 49: Swimming pool heating with renewable energy sources	<i>A stakeholder expressed that 'it does not make sense to heat swimming pools outside'.</i>	No change We understood that this is a common practice in cold weather areas in order to meet quality standards expected by consumers. As we cannot ban this practice, we think that it would be important to promote that this is done through the use of renewable energy sources.
	<i>100%? Is it possible to put a 95% here? In fact, many seasonal campsites heat the pool ONLY with solar energy... except the 2 first days of the season. At the end of the winter (march/April) the temperature is too cold to warm all the pool water only with a solar system. During the 2 first day, they need to use gas to make the temperature increase quickly or heat pump. Then they use only solar panel... during en 198 other days of the season.</i>	Updated criteria We accept the comment.
Criterion 51: Use of rainwater and recycled water	<i>A stakeholder (association) asked for clarification on what is within fresh water, and what is within waste water e.g. where you put reverse osmosis especially if you are offering this label in hotels outside EU where an increasing number on their own plants does those count as fresh water or recycled water, where you put bore holes that are used extensively in a large number of areas in southern Europe and are getting deeper?'</i>	Updated criteria Definitions of the alternative water sources will be included in the user manuals. See rationale and updated criteria: Criterion 41: Use of alternative water sources (section 2.1.8.1)
Criterion 52: Automatic	<i>Competent Body suggested to keep as it was. The proposal to change from a performance criteria to a management criteria make it difficult to audit and verify. However, a stakeholder (TA) claimed that they have a procedure because they have a trained handicap person to water plants.</i>	Updated criteria Against the different views a compromise would be to allow

Criterion	Stakeholder Comment	JRC IPTS response
watering systems for outside areas	<i>Should the accommodation service providers be required to include including details of the documented system/procedure for watering?</i>	the two systems, automatic and trained staff. It is suggested that this criterion should be rationalised to take into account the different systems. The criterion would then recognise the relative high investment required to introduce an automatic system. See rationale and updated criteria: Criterion 42: Efficient irrigation (section 2.1.8.2)
	<i>We suggest not to add and ask more documentation to the TAS. It is suggested that both BEMP and the stakeholder feedback is considered in updating this criterion. Importantly, this criterion is focused on minimising water consumption for irrigation and should therefore allow tourist accommodation to establish a best practice system. This may be, for example, to not water the garden at all: OK</i>	
Criterion 53: Water flow from taps and shower heads	<i>"The average flow from all taps and filing stations (excluding bath taps) shall not exceed 5 litres/minute."</i>	Updated criteria The proposal is to compromise by adjusting the limit to 6 litres/minute which is the limit allowed at EU Ecolabel for sanitary tap wares. The criterion goes beyond the mandatory criterion as kitchen taps are not excluded for the requirement of maximum flow at this optional criterion. Shower heads have been removed from the criterion title as are not addressed. See rationale and updated criteria: Criterion 43: Water flow from taps (section 2.1.8.3)
	<i>Here again we would like to underline the problems raised when discussing the final criteria on sanitary tap ware (November 2012, EUEB): "potential difficulties linked with the limited water flow rates raised by several MS: as regards hygiene, water stagnation (FR, ES), the overall functioning of the sewage system (FR), consumer comfort and possible costs for tourist accommodations in case of an integration of these criteria in the tourist accommodation criteria (AT)" 5 Litres/Minute is impossible to reach on an hotel with many floors or on a campsite (problems with the pressure)</i>	
Criterion 54: WC flushing	<i>Have you ever tested a 4 litres full flush ? I'm not going to make a draw... BUT on some (many) situations... 4L won't be enough. Try at home when you have to do "a number 2" - Close the toilet tap - Empty the flush bath - Open the flush - Fill 2x2L Coca Cola bottles with water - Put your water on the bath... - Check the result ;) After the meeting on Sevilla, we did the test... and we won't put 4L flushes on the camp :o) AT LEAST : 6L like it was before...</i>	Updated criteria The proposal is therefore to restore the criterion to its original text with a limit of 6 litres per full flush or less as decreasing the value could lead to the bad practice of flushing twice as mentioned by several stakeholders.
	<i>Moreover, we underline that France voted negatively on Decision "flushing toilets and urinals" (2013/641/UE), for the following main reason: The French Technical Centre on Building CSTB is not in favour of the inclusion if the criterion 1C "Average flush volume". The proposed average flush volume only applies to toilets 5l/3l.</i>	

Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>As expressed during the last EUEB meeting, for sanitary equipment, public purchasers have to refer to the document NF DTU 60.1 P1-1-3. This document does not cover toilets having a full flush volume inferior to 6l.</i></p> <p><i>Consequently, the criteria document as it is now could not be used by public purchaser in France.</i></p> <p><i>We agree with the stakeholder comment that it's too stringent. Perhaps 4 litres per flush if using a water saving device or a maximum of 5.0 litres per full flush would be better.</i></p>	
Criterion 55: Dishwasher water consumption	<p><i>We think this equation couldn't be right or AWC doesn't represent the measured annual water consumption because, if you make the calculation following this equation, the equation result it's too low to be the annual consumption.</i></p>	<p>Updated criteria</p> <p>Following stakeholder feedback received at and after the first AHWG it is proposed to clarify the criterion by deleting reference to 'annual' in the calculation of water consumption and to align the requirement to the benchmarks identified at the Regulation Directive 2009/125/EC.</p> <p>See rationale and updated criteria: Criterion 44: Dishwasher water consumption taps (section 2.1.8.5)</p>
Criterion 57: Tap water temperature and flow	<p><i>Better wording for Criterion 57. Tap water temperature and flow was requested.</i></p> <p><i>A precise and prompt regulation: What is a precise and prompt regulation?</i></p> <ul style="list-style-type: none"> - Faucet? - Mixer faucet? - Temperature control Tap? 	<p>With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement. Further, all tap devices allow prompt and precise regulation.</p>
Criterion 58: Shower timers	<p><i>Should the point allocation for the proposed criteria be adjusted?</i></p> <p><i>I suggest: Timing device : 1pt</i></p> <p><i>Proximity sensor : 1,5pt => 1,5pt max</i></p>	<p>With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of that there is no reference in BEMP to this type of requirement and that water flow from taps and showers is addressed as mandatory criterion in order to decrease the water consumption from showers.</p>
Criterion 59: Swimming pool cover	<p><i>We consider that this criterion is not very clear. If the accommodation has the two types of pools and comply with both, how many points it will have?</i></p>	<p>"Heated swimming pools shall be covered at night to prevent the cooling of the water in the pool and to reduce evaporation, and/or non-heated, filled swimming pools shall be covered when these are not used for more than a day to reduce evaporation (1 point shall be allocated if all swimming pools (heated swimming pools and/or filled, non-heated swimming</p>

Criterion	Stakeholder Comment	JRC IPTS response
		pools) are covered).
	<i>A stakeholder (association) mentioned that swimming pool covers are illegal in some countries (e.g. Morocco). They suggested considering the context of the local regulation.</i>	We do not see a problem here as this is an optional criterion.
Criterion 61: Indications on water hardness	<i>This criterion needs to be mandatory! (a lot of chemicals can be saved for a few work to do...)</i>	Proposed rewording:
	<i>No alternative, there must be both situations, with the assignment of 2 points.</i>	<i>"In proximity to sanitary areas/washing machines/dishwashers there shall be displayed explanations about local water hardness (1 point) to allow better use of detergents by guests and staff <u>and</u> an automatic dosage system (1 point)."</i>
	<i>Make it clear that is either one condition or the other. The verification form adds two points if two "yes" are placed</i>	To improve and make clearer - replace "or" with "and"
	<i>Should the point allocation for the proposed criteria be adjusted?</i> <i>2 points for automatic dosage system</i>	No change No justification
Criterion 63: Indigenous species used for new outdoor planting	<i>A TA stakeholder suggested considering also species which are very well adapted to environment. Another stakeholder mentioned that accommodations that water are being benefitted with extra points and those who do not water are not being awarded by this criterion.</i>	With the aim to simplify the criteria set and regarding the difficulties on defining and verifying indigenous species it is proposed to remove this criterion.
	<i>Can you indicate what the characteristics of indigenous species are</i> .	
	<i>We can consider that many species can be well adapted to a ground... so the word isn't "indigenous" but maybe "well adapted"...</i> <i>I tried to make a definition with my "CPIE" (Centre Permanent d'Initiatives pour l'Environnement)... well the best way to describe the criterion would be :</i> - A specie that doesn't need more water than any other species in the area (can grow without watering) - A specie that doesn't need more fertilizer than any other species in the area (can grow without fertilizer) - A non-invasive specie <i>Then if a specie fill those 3 characteristics... it can be considered and "well adapted" to the ground</i>	
	<i>Fight against invasive species might be more important than the use of indigene species. This aspect could be added in this criterion.</i>	
Criterion 64: Detergents	<i>A stakeholder suggested to rationalised points and award detergents and toiletries individually.</i>	No change Although the inclusion of other natural cleaning products was

Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>Should 'natural products' be allowed to be used under this criterion? If yes, is the proposed definition acceptable?</i></p> <p><i>Yes</i></p> <p><i>Is the proposed definition acceptable?</i></p> <p><i>The definition of "natural products" is not rather precise. Because natural products does not systematically means safe or good for the environment</i></p> <p><i>Should the point allocation for the proposed criteria be adjusted?</i></p> <p><i>Is it possible to have up to 4 points?</i></p> <p><i>Should 'natural products' be allowed to be used under this criterion?</i></p> <p><i>Yes, natural products should be allowed. The definition can just speak about "natural OR Organic Certified product". I don't think that need something more precise...</i></p>	<p>suggested, it is proposed that this should not be included. This is primarily because 'natural products' may be hard to define and it may be difficult to find products which have undergone the same rigorous, life-cycle based assessment as those classified as type-I labels. In turn, this would make verification difficult.</p> <p>Further, Vinegar is not addressed within Tripadvisor Greenleaders criteria or any other environmental labels for tourist accommodation.</p> <p>Against this background, it is proposed to keep the first proposal revised criterion.</p>
Criterion 65: Indoor and outdoor paints and varnishes	<p><i>It was suggested that paint which has been verified by renowned ecological institutes (not only ecolabels) should be included within scope: Yes</i></p>	<p>It is not easy to verify as it has to be either past or forward looking, thus it is proposed to remove it.</p>
Criterion 67. Support to alternatives to artificial barbecue lighter	<p><i>A stakeholder suggested rewording criterion. 'Shall be offered' instead than 'shall be sold' as sometimes is given for free.</i></p> <p><i>Can you replace "sold" by "purposed". Because I know some camping who give those products for free in order to promote it!</i></p> <p><i>You can also delete "in shops" because on the little campsites it's just purposed at the reception.</i></p>	<p>With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and no specific BEMP guidance for alternatives to artificial barbecue lighter.</p>
Criterion 68: Dosage of disinfectants or natural/ecological swimming pools	<p><i>Should the point allocation for the proposed criteria be adjusted?</i></p> <p><i>2 points for ecological swimming pool: so it's more balanced</i></p>	<p>Updated criteria</p> <p>Allocate 2 points to an ecological swimming pool.</p> <p>Only one comment suggests 2 points but an ecological swimming pool is a much greater investment than an automatic dosing system so maybe it should be rewarded with an additional point.</p>
Criterion 69: Mechanical cleaning	<p><i>A CB suggested that maybe is not practical to carry out all cleaning without chemicals.</i></p> <p><i>Several stakeholders claimed that it is too strict and not hygienic. They claimed that they use vinegar. 'It is cheaper than ecolabel products and more efficient'.</i></p>	<p>With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and no specific BEMP guidance for mechanical cleaning. Furthermore,</p>

Criterion	Stakeholder Comment	JRC IPTS response
		criteria on disinfectants and detergents are already in place. This is an optional criterion and there is a caveat in respect of adherence to hygiene regulations and health & safety requirements.
Criterion 70: Organic gardening	<i>It would be fairer to make a distinction between an organic garden and an organic farm, giving more points to the latter.</i>	No change This criterion is about gardens surrounding the accommodation.
Criterion 71: Insect and pest repellents	<i>The verification form adds two points when marking "yes" in both options. That should be an "or" + specify at least on user manual that the mosquito nets must be placed everywhere.</i>	No change We expect the tourist accommodation to take appropriate action (e.g. provision of mosquito nets) across the site (e.g. in all rooms) in order to keep the use of chemical based insect and other repellents to a minimum. See below, so that mosquito nets have to be provided in all rooms. User Manual can explain further but this is an 'and' not an 'or'.
	<i>Should the provision of mosquito nets in all rooms be required to meet this criterion?</i>	See above
	<i>Yes</i> <i>"To a strict minimum"</i> <i>Maybe you can be more specific on this item... what is the "strict minimum" ...when there is a danger?</i> <i>For legal reason ?</i> <i>My wife hates (really!!) bees... I listen to her, the strict minimum would be to empty a full bottle of killing-product for each bee...</i> <i>So maybe it can happen some differences between peoples...</i>	Updated criteria <i>"Architectural design of the accommodation and hygiene practices (such as building on stilts to prevent rats entering premises, use of mosquito nets and coils) shall ensure that the use of insect and pest repellents in the tourist accommodation is kept to a minimum (1 point)."</i> Deleted word 'strict' "Strict" cannot be usefully defined. The criterion requires the applicant to demonstrate how they have implemented this criterion. There is some flexibility built in.
	<i>Clarification on the strict minimum was requested for criterion 71. Insect and pest repellents.</i>	See above
Criterion 72: Composting	<i>A TA stakeholder suggested awarding 1 more point for the costumer waste composting and rationalized points for different types of waste.</i>	Updated criteria It is proposed to keep the proposed criteria. It is suggested to

Criterion	Stakeholder Comment	JRC IPTS response
	<p>Could we add 1 more point for TAS who compost the waste of their customers?</p> <p>Should the points allocation for the proposed criteria be adjusted? Composting <i>INSIDE</i> the accommodation is more effective and therefore should be rewarded with a higher score: 2 points (where separation was already mandatory because of criterion Waste separation).</p>	<p>align the criteria to Trip advisor greenleaders and to award an extra point to those applicants that compost biodegradable materials.</p> <p>Information related to composting methods and relevant material waste could be included at the user manual in order to reduce complexity.</p> <p>See rationale and proposed update: Criterion 54: Composting (up to 3 points) (see section 2.1.10.1)</p>
Criterion 73: Disposable drink containers	Mandatory	Banning disposable/single-use food service items have been included in mandatory criterion 20.
	A stakeholder (CB) suggested keeping Criterion 73. Disposable drink containers, as the real scope of this criterion is to ban plastic bottles drink containers, cans, etc...	
	The current criterion awards points to tourist accommodation site who take no action at all, i.e. those who do not offer any drinks to guests. Stakeholders are invited to provide their feedback on the update of this criterion. Should this criterion should therefore be removed or be mandatory? The accommodation that does not offer any drink to guest cannot be compared to the one which makes an effort to buy appropriate drinks. the first case should be excluded. Italy did this so far...	<p>Updated criteria</p> <p>The proposal is to merge this criterion with the criterion addressing alternatives to disposable drink containers (current criterion 86: Returnable or refillable bottles).The criterion has been renamed as beverage provision. See criterion 55. beverage provision (section 2.1.10.2)</p>
	Specify what disposable drink containers are: we do accept 0.5 l plastic bottles for water, but we do not allow the same size for coke and similar (we require the glass bottle). What is allowed and what is not?	
The problem will be the definition of "disposable": - If you mean that people can't have any bottle... then it's impossible... when you have shops. - If you mean that "little bottle" are forbidden... then you may understand that in the campsites... the 6 o'clock 50cl beer in a can is like a "tradition"... But we have to make a specific information to remind customers to recycle...==> If we can keep selling it with an information about recycling... then it can be mandatory... but when we have shops it's too hard for us to forbid...		
Criterion 74: Fat/oil disposal	<p>It is suggested that Criterion 74 is removed: Yes</p> <p>It is therefore suggested that Criterion 74: fat/oil disposal is removed: Okay removing all references to the waste separation, which are included in the criteria "Waste separation" and "Waste separation by guests." Leave the first paragraph by assigning 1 point for separators.</p>	Removed criteria.

Criterion	Stakeholder Comment	JRC IPTS response
Criterion 76: Used textiles, furniture and other products	<i>A stakeholder suggested to better reword the criteria to clarify if it is all product to be given or it is only some parts of the product.</i>	Updated criteria <i>"All furniture, textiles and other products such as electronic equipment, <u>that have reached the end of their usable life within the Tourist Accommodation...</u>"</i> This will aid clarity
	<i>Several stakeholders (TA) claimed that they do not receive a bill for this. There are containers where they put the textiles or other products.</i>	See above This is allowed for in the proposed criterion.
	<i>A stakeholder (association) expressed that an exception must be included in criteria where is not permitted by regulation. E.g. Furniture which doesn't comply with fire standard you cannot put in charity.</i>	See rewording above
	<i>Textile rental and cleaning contracts running on 5 years rather than 3 years should bring additional points. It incites to use high quality natural textiles such as linen, and reduces the carbon impact. Share internally procedures to make sure the team has the best use of the textile, in order to avoid damaging it or making difficult stains on it which will require chemicals to remove; For example make sure to not use a tea towel for dirty things but an old rag.</i>	No change Although this could be relevant we understood that service providers in most of the cases do a responsible use of their own furniture and we think it is more important to focus on the extension of furniture life through their reuse.
	<i>Maybe you can precise if it needs to be "all furniture, textiles, others products" or "some..." because the criterion let us think that it is everything...</i>	Yes, see rewording above
Criterion 77: Regulation of campsite traffic	<i>Several stakeholders suggested opening these criteria to all types of accommodation. A TA stakeholder suggested extra points to accommodation sites which forbid vehicles at night.</i>	Updated criteria Following stakeholder feedback it is proposed that Criterion 77: Regulation of campsite traffic and Criterion 78: Campsite generated traffic, are made applicable to all tourist accommodation services and not "campsites only". Criteria 77 and 78 have been merged as both criteria address the same and name has been reworded accordingly: Updated criterion 57: Tourist accommodation traffic
	<i>"All traffic (guests and maintenance/transport) inside the camp ground shall be limited to defined hours and areas" In fact I would like to point that several campsites just forbid vehicles at night (in France you can see that on almost all the campsites). I asked the criterion to be more stringent: the traffic regulation must include more restrictions than only forbidding traffic at night. Moreover My purpose would be a wording like: Regulation of campsite traffic (1 point) (campsites only). All</i>	No change This is catered for within the proposed criterion.

Criterion	Stakeholder Comment	JRC IPTS response
	<i>traffic (guests and maintenance/transport) inside the camp ground shall be forbidden except during defined hours (including several sunshine hours) and areas. Assessment and verification: The applicant shall provide a detailed explanation of how the campsite fulfils this criterion, together with appropriate supporting documentation.</i>	
Criterion 78: Campsite general traffic	<p><i>Many campsites forbid the traffic at night... in fact this criterion need to reveal a real regulation (like: possibility to drive only 1 to 4 hours a day only!). Could it be possible to say: All traffic shall be forbidden at night (1pt) or shall be allowed a few hours (<5) during the day (1,5pt)?</i></p> <p><i>The scope isn't correct: some resorts (actually linked to the TAS Ecolabel) actually take some traffic regulation rules. It may be interesting to open this criteria to all the TAS of the 2015-E.E.</i></p>	<p>Updated criteria Following stakeholder feedback it is proposed that Criterion 77: Regulation of campsite traffic and Criterion 78: Campsite generated traffic, are made applicable to all tourist accommodation services and not "campsites only"</p>
Criterion 79: Trolleys for guests on the campsite (campsite only)	<p><i>Non-motorised: TAS Generated traffic: some hotels and resorts can also use electric cars.</i></p> <p><i>Could you make an exception for motorised transportations run by 100% renewable energy? For example on our camping, it's impossible to provide trolley because 90% of the surfaces are unsealed... (cf Criterion 80) that would be hard to carry on for customers BUT because there is car regulation (people can only drive 2 hours a day - cf 77) we purpose free transportation with electric cars running with 100% renewable energy... :)</i></p> <p><i>(campsites only):</i></p> <p><i>Not only for camping please :)</i></p>	<p>With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement.</p>
Criterion 81: Roof landscaping	<i>A stakeholder (association) suggested including natural shading in this criterion.</i>	No change Difficult to assess.
	<i>"It is suggested that one more point is added as this can be difficult to achieve?"</i>	See rewording below Yes, significant investment required
	<i>Yes</i>	See rewording below
	<p><i>Should the point allocation for the proposed criteria be adjusted?</i> <i>We are in favour to add one more point, because it's difficult to fulfil this criterion</i></p> <p><i>"And/or"</i> <i>I don't understand the 50% going with you "and/or". May I take 2 examples: EXAMPLE 1: I have 2 rectangular buildings with only one suitable roof (I have solar panels on the second one) so I grass my roof building: One suitable roof grassed => 100% => Criterion completed because it is roof or facade. EXAMPLE 2: I have 2 rectangular buildings with no suitable roof (solar panel on the first one... and the second one is not flat enough!). On one of this building I grass the facade...=> 4x2 = 8 suitable facades => 12.50% => Criterion none completed because EXAMPLE 3: Let's have a very strict</i></p>	<p>Updated criteria Amendment is substantiated by the stakeholder.</p> <p><i>At least 50% of the tourist accommodation building(s) which have suitable roofs (flat roofs or roofs with a small angle of inclination) (1 point) and façades (1 point) and are not used</i></p>

Criterion	Stakeholder Comment	JRC IPTS response
	<i>competent body ;-). I have 2 rectangular buildings with only one suitable roof (I have solar panels on the second one) so I grass my roof building: ==> 2 suitable roofs ==> 4x2 = 8 suitable facades => So with my grassed roof I only have 10% => Criterion not completed because it is roof AND facade... :) You may reword :)</i>	<i>for other purposes shall be grassed or planted."</i>
Criterion 82: Environmental communication and education	<i>Should this criterion remain optional?</i>	Reword title to “Environmental and social communication and education”
	<i>It has to remain optional because this can be a solution to get point for TAS who don't have grassed areas, swimming pools; restaurant, fitness centre (...)</i>	
	<i>An association stakeholder mentioned that the additional point to local guides market should be in other criteria (the title is not adapted) should be other one.</i>	See above Communication regarding local guides is included within the proposed criterion.
	<i>The tourist accommodation shall provide communication on local guides, restaurants, markets, craft centres to guests (1 point).</i>	See above This revision is introducing more social requirements in line with the Regulation 66/2010. This criterion reflects that.
	<i>No, since it does not have anything to do with the environment.</i>	
	<i>Guest entertainment includes elements of environmental education (1 point).</i>	See above This may not be the case in every situation
	<i>Make it 2 points since it means more effort from the tourist accommodation staff.</i>	
	<i>The tourist accommodation shall provide communication on local guides, restaurants, markets, craft centres to guests (1 point).</i>	See above This isn't practical. The criterion is about meeting social requirements - see above
<i>Only if local guides, restaurants, markets, craft centres have adopted an environmental policy, otherwise it is not consistent!</i>		
<i>Should this criterion remain optional?</i>	See above Only one supporter of this.	
<i>No. Making it mandatory would be a turning point for the knowledge of the Ecolabel.</i>		
Criterion 83: No smoking in common areas and rooms	<i>Which option is preferred?</i>	Option 1 proposed.
	<i>Option 2: is optional, and the step forward is without risk.</i>	
	<i>A TA stakeholder mentioned that legislation in France obliged to provide a minimum of (5-10%) smoking rooms. A CB stakeholder suggested awarding 1 point to 80% and 2 point to total ban.</i>	
	<i>Which option is preferred? In favour of option 1</i>	
	<i>My preference would be for 100% BUT there is a law in France and the hotels must have (I think...) 5% of smoking rooms. The problem doesn't exist on the campsites. So it HAS to remain the same.</i>	

Criterion	Stakeholder Comment	JRC IPTS response
Criterion 84: Bicycles	<i>A TA stakeholder pointed out that offering 3 bikes for 50 pitches is 1 bike for 300 persons. They suggested increasing the number of bikes. They recognized that it would be easiest to have an agreement with company hiring bikes. They suggested to rationalized points in order to reflect this.</i>	Updated criterion See rationale and updated criteria: Criterion 62: Bicycles (section 2.1.11.8)
	<i>It is suggested that this criterion be updated so that points are awarded to tourist accommodation sites which have active links with bicycle hire companies and communicate this clearly to guests. It is also important that the meaning of 'active links' is clear:</i> Yes	Reword – as “partnerships’ rather than ‘links’: “Bicycles shall be made available to guests. (At least three bikes for every 50 pitches and/or rental accommodation units and/or rooms) (1.5 points) Or The tourist accommodation shall have active <u>partnerships</u> with bicycle hire companies; access to these shall be clearly communicated to guests (1 point). Assessment and verification: The applicant shall provide an explanation of how the tourist accommodation fulfils this criterion along with any information to be provided to guests. ‘Active <u>partnerships</u> ’ between tourist accommodation and a bicycle hire company should be visible on site.” This is clearer and reflects comments below as well.
	<i>The tourist accommodation shall have active links with bicycle hire companies; access to these shall be clearly communicated to guests (1 point). Active links should be replaced with active partnerships, as “links” can be interpreted as web based “links”.</i> <i>As the purpose of the criterion is to make guests use bicycles near to the accommodation, a maximum of short distance from the accommodation, e.g. maximum of 15 minutes walking distance. If the tourist accommodation has its own bikes at the place, another 1 point can be offered.</i>	See rewording above Do not agree with walking distance because an active partnership may be the delivery of bikes to the Tourist Accommodation or campsite.
	<i>Should the point allocation for the proposed criteria be adjusted?</i> <i>As the second option added only need a "single paper" (so that's really easy to have those points)... would it be possible maybe:</i> - To put 1 pt when the TAS have active links... - To put 2 pt for bicycles available for guest... and say at least 4 bikes for 50... ?)	See rewording above Yes - reword to reflect the changing allocation of points

Criterion	Stakeholder Comment	JRC IPTS response
Criterion 85: Pick up service	<i>Several stakeholders see an issue on collective transport organized by the accommodation. 'Customers do not arrive at the same time'.</i>	Public transportation it is considered a best practice compare to the use of pick up service. As public transportation is promoted in the mandatory Criterion 23 which is proposed to be more comprehensive, it is suggested to remove this criterion.
	<i>A stakeholder suggested awarding 1 point for the offering of the service and second point if it is offered by eco-company like car sharing, bike, etc...</i>	
	<i>Proposed update: include collective transport, and better reflect common practice.</i>	
	<i>Maybe it is difficult for the tourist accommodation to organize collective transport together with other places. This should be reflected in more points.</i>	
Criterion 86: returnable or refillable bottles	<i>"Soft drinks (1 point), beer (1 point), water (1 point)"</i>	This is practicable and therefore it is proposed that the revised criterion is amended to include wine for the award of an additional 1 point. The criterion is proposed to be merged with Criterion 73: Disposable drink containers. (See section 2.1.10.2).
	<i>And the wine??? 1 point for the wine, too! In Italy wine is available in returnable/refillable bottles. Always maximum 3 points.</i>	
	<i>1 point even for detergents on tap! Always maximum 3 points.</i>	
Criterion 87: Use of rechargeable products	<i>A TA stakeholder claimed that the products are expensive and can be robbed (Remote control batteries).</i>	Updated criteria It is suggested to not include the ban of use of single use bin liners for sanitary and quality reasons as bins might get dirty if bin liner is not used. The points have been amended accordingly. We understand that these products are expensive and for this reason the criterion is proposed to remain optional.
	<i>Reusable and rechargeable products (up to 3 points)</i>	
	<i>"The tourist accommodation shall use only rechargeable batteries for all consumables (1 point), and/or rechargeable cartridges for toner for printers and photocopiers (1 point) and/or no bins in guest rooms or common areas shall use single-use (i.e. not reused) disposable plastic bin liners (1 point)"</i>	
	<i>YES / should be made mandatory</i>	
	<i>"Documentation from the suppliers" As I explained in Sevilla... is it possible to allow the points when TAS show a bill? In fact when you put rechargeable batteries on TV remote... like the rechargeable batteries are more expensive than traditional ones... people sometimes (very often!!!) steal them! So when you proudly open the remote to show to your favourite Competent body that you are OK with the criterion... you fail.</i>	

Criterion	Stakeholder Comment	JRC IPTS response
	<i>In France, this nearly disappeared and people using rechargeable cartridges are not satisfied of their quality.</i>	
Criterion 88: Paper products	<i>Toilet/tissue paper and/or office paper and/or printed paper: Can you add envelopes?</i>	Proposed rewording - to add envelopes:
	<i>90% of toilet/tissue paper and/or office paper and/or printed paper used shall have been awarded the EU eco-label or other national or regional ISO Type I eco-labels (1 point for each of these three categories of paper products).</i>	No change It is an optional criterion.
	<i>TA specified that it's already difficult to reach 80%, so not in favour of changing this criterion 100%: criterion is optional and the step forward is without risk. Mature market</i>	
Criterion 90: Local food products	<i>A TA stakeholder suggested keeping it optional as they do not have local food in Paris.</i>	No change Need to define what 'local' means in the User Manual
	<i>A consumer organization claimed that local could be the region. They support to make it mandatory</i>	No change See response above
	<i>Should this criterion remain optional? No, it's better to keep it as optional. It can be difficult to apply according to the different types of regions (rural, rural). The products are not always easy to find locally.</i>	No change See response above
	<i>Need to be mandatory BUT: could you develop what is a locally sourced product? Is it only a "local production" or for example if we buy the bread from the local artisanal producer, do you consider it as a local product? I think this second option would be on the spirit of the ecolabel</i>	No change See above
	<i>If made mandatory, the examination of documentation must be precise and equal for every MS. I would ask how the other MS think to verify this criterion.</i>	No change
Criterion 92: Indoor air quality	<i>Natural fragrance coming from plants or flowers, via essential oils or hydrolat or wax, free of chemicals and petrol, should be allowed</i>	With the aim to simplify the criteria set and to focus on environmental hot spots it is suggested that this criterion is removed on the basis of its low environmental benefit and that there is no reference in BEMP to this type of requirement. Further there might be overlap as EU Ecolabelled detergents, all purpose cleaners, paints...are already addressed in other
	<i>"Indoor air quality (up to 4 points). The tourist accommodation shall provide an optimal indoor air quality through one or both of the following measures ..." With regards to "indoor Air Quality" less focus should be on once already purchased/used material</i>	

Criterion	Stakeholder Comment	JRC IPTS response
	<i>(this could be in another Criterion 89: Durable goods) and more focus on indoor air quality with respect to fragrance free detergent wash (2 points) and fragrance free cleaning of the room (2 points).</i>	criteria.
Criterion 93: EMAS registration, ISO certification of the tourist accommodation	<i>Should the points allocation for the proposed criteria be adjusted?</i>	Updated criteria Mandatory criterion on environmental policy has been proposed to be deleted. On this basis it is proposed to promote optional criterion on ISO14001 and EMAS CERTIFICATION by adding extra points at optional criteria. See rationale and updated criteria: Criterion 68: Third party certification of the tourist accommodation (up to 4) (section 2.1.12.1)
	<i>1 point more (EMAS 4 points, ISO 3) Criterion 93 and 94: DK proposes to make no difference between EMAS and ISO, with a max. of 2 points in [Criterion] 93 and up to 2 points in Criterion 94 if up to two suppliers are having either EMAS or ISO 14.001. There is no environmental argument for differentiate between these two systems, but with regards to the numbers of suppliers it will have a tremendous impact down through the supply chain if not only one, but two suppliers have a certified environmental management system.</i>	
Criterion 94: EMAS registration, ISO certification of suppliers	<i>One... This is too easy !!!! For example in France, the national Electricity provider (EDF) is ISO14001 certified... Why not having "at least 4" ?...</i>	Updated criteria It is proposed that the criterion is revised to require two of the suppliers to be registered/certified as per the criterion). As several criteria have been removed in order to simplify the criteria set, some points should be reallocated in other criteria in order to keep the scoring rules of the punctuation system. It is suggested to include extra points in this criterion as this is an environmental hot spot highlighted by BEMP and LCA review.
	<i>Up to 3 points: 1 point for each ISO supplier and 1,5 points for each EMAS supplier</i>	
Criterion 95: Compliance by subcontractors with mandatory criteria	<i>Should the point allocation for the proposed criteria be adjusted?</i> <i>In order to promote TAS who actively work with the subcontractors... would it be possible to have 1 point for each subcontractor... with a limit of 5 points? In fact, it's really difficult to make the subcontractors work on the same way... especially when they are not located into the TAS... To my opinion it is also a way to develop (in a long term view) the other scopes of Ecolabels.</i>	No change The criterion would then score too high relative to others.
Criterion 97: Additional	<i>Additional environmental actions: You might think to provide for a bonus score for each section of the criteria.</i>	With the aim to simplify the criteria set, this criterion is suggested to be removed. It is considered too open and vague. We consider that the environmental hotspots are already

Criterion	Stakeholder Comment	JRC IPTS response
environmental actions	<i>(b) Eco-label award (3 points): The tourist accommodation shall be awarded one of the national or regional ISO Type I eco-labels:</i>	covered and if environmental hotspot is identified during this revision should be covered as specific criteria.
	<i>With a view to promoting European Ecolabel, you should not reward the competition ... (up to 1.5 points each, to a maximum of 3 points)</i>	
	<i>As the aim of this revision is to provide more flexibility... could you maybe put:</i> - Up to 5 points - 1 point for each action <i>That can allow TAS to develop their own actions.</i>	
	<i>Separate additional environmental Actions into different "impact - energy/water/waste" sections in which specific actions diminishing specific impacts are awarded with bonus points. Create different section of additional environmental actions for every thematic impact (water, waste, energy, soft mobility)</i>	
	<i>Up to 1.5 points each, to a maximum of 3 points</i> <i>The maximum could be higher, like 4,5 points, in order to reward more actions. (1,5 point per action)</i>	
New criterion: Swimming pool backwashing	<i>It is an EXCELLENT idea! This criterion must be added :)</i>	No change
	<i>A stakeholder suggested taking into consideration that as a minimum backwashing procedures comply with the manufacturer's requirements recommendations. They found that one of the main savings doesn't come from the water heat loss it comes from the fact that a ventilation system is adjusted.</i>	No change This criterion is optional and about optimisation not minimum requirements
	<i>How would it be evaluated? Shouldn't we give a minimum and a maximum frequency?</i>	No change The optimum frequency will depend on the manufacturer, the frequency of use etc. The purpose of the criterion is to ensure that a procedure has been developed and staff are trained to follow it and at the inspection it is being implemented.
	<i>Ok to add this optional criterion</i>	No change
Proposed new criterion: Local food products (mandatory)	<i>A stakeholder (TA) suggested including the optional criterion on this mandatory criterion. Other stakeholder agreed with proposed new criterion. However a CB stakeholder pointed out that the title of criterion is not consistent with criterion text. JRC clarified that the name comes from the Criterion 90 and that it will be corrected.</i>	It is proposed that this criterion is not finally proposed as there are already legal requirements and it is very difficult to use the EU Ecolabel to set additional requirements regarding the differences of endangered species along different countries.
	<i>Yes I agree with the criteria</i>	


Criterion	Stakeholder Comment	JRC IPTS response
	<p><i>Difficult to verify. We think it is more significant to make mandatory the "km 0"</i></p> <p><i>Do you agree with the proposed assessment and verification method?</i></p> <p><i>Yes it should be added, but with reference to a reference list of species.</i></p> <p><i>Should this new criterion be added?</i></p> <p><i>OK, but not merge it with the optional Criterion 90</i></p> <p><i>Do you agree with the proposed assessment and verification method?</i></p> <p><i>Requires an exhaustive or precise legal references</i></p> <p><i>Are there any other factors which need to be included</i></p> <p><i>What about the list (Appendix A/B/C of the Rule n° 338/97?)</i></p> <p><i>Together with appropriate supporting documentation.</i></p> <p><i>We think this criterion should not be mandatory unless we can define what is considered appropriate supporting documentation on this case and which exactly the prohibited species are.</i></p> <p><i>The title is misleading: we suggest "protected animal species"</i></p>	
<p>Proposed new criterion: Fundamental principles and rights at work (mandatory)</p>	<p><i>The applicant shall demonstrate compliance, using independent verification or documentary evidence and this will be checked as part of the on-site inspection.</i></p> <p><i>We agree with stakeholder comment about what sort of verification is regarded as independent and also that there are regulation about this subject and it's not the role of the CB's to check that. Besides, with the resources that some CB's have, it's very difficult to verify and control.</i></p> <p><i>We agree with this new proposal. The assessment and verification part could be improved by asking for written procedures on how a self-evaluation is being performed (which should be done each year)</i></p> <p><i>There was a general agreement on the importance of its inclusion especially having into account that these criteria are being implemented outside Europe. Concerning the documentation asked from human resources, a TA stakeholder see an issue as they do not have documents on site. A TA stakeholder suggested that a list of best practices and maybe are more practical. They committed to give extra information about experts on this field.</i></p>	<p>Updated criteria</p> <p>Although it is important to harmonise different EU Ecolabel product it is important to recognise the specificities of different products/service. Therefore it is proposed to include the employment requirements addressed in other environmental schemes for tourism which cover minimum national legislation and beyond.</p> <p>It is proposed that the Assessment and verification procedure requests that the applicant provides a report from an independent auditor and in order to recognise the high investment for such certifications documentary evidence to demonstrate compliancy it is proposed to be a mean of</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<p>A CB stakeholder strongly supports this criterion and welcomed the idea of contacting experts on this field. They see the issue about verifying but they suggested the possibility to have a kind of self-evaluation and also on-site inspection</p> <p>A consumer organization stakeholder supports the criterion and asked for additional social actions as have been suggested in page 55 of technical report. as giving a bonus to the person reducing waste... they supported a new criterion on this.</p> <p>Difficult to verify. Plus, where it is a law obligation it is not us who should verify where it is not regulated by law, it is impossible to verify compliance.</p> <p>It should be added maybe as an optional criteria and focus on actions like annual discussion of the employees with the manager, working conditions, skills development... Which are not legal obligations (which are guaranteed by the countries law and not the label) but which are actions that goes beyond regulations (this is the role of the label).</p> <p>This social part is severely lacking in the EU Ecolabel today.</p> <p>Should this new criterion be added?</p> <p>The proposed criterion is copied and pasted from other recent ecolabels (lubricants,...). We cannot have the same level of requirements for a factory as for a TA.</p> <p>We don't agree with the actual proposal, we are in favour of a new optional criterion on social actions carried by the TAS in favour of his staff, as we suggested. Example: social action to improve wellness at work</p> <ul style="list-style-type: none"> • The hotel can give a bonus to a person which reduces the waste of the breakfast buffet. • Help of the manager to fill the file of loan for the bank with the aim of a real estate purchase for the employee. • Implementation of a shuttle in late hours for the travel of staff. <p>This criterion is a European regulation point. It's not the role of a Certification Body to check the regulation. It can be difficult to prove for the applicant. Besides, are the auditors skilled to evaluate that point properly?</p> <p>We suggest that the respect of these fundamental principles could just be printed on a poster put up in the staff private rooms. The internal policy for sharing tips could be added as well as the payment of the worked hours in respect of the local legislation. This information could also be given to the clients.</p>	<p>verification.</p> <p>See rationale and updated criteria (section 2.1.5.4)</p>
General Comments	<p>A license holder regrets the EU ecolabel doesn't take into account social part of sustainable development. She is working in this way in her campsite: working with local suppliers, building long term partnership with her employees, employing disabled people, promoting local products for the clients...</p>	<p>Updated criteria</p> <p>The new criteria set address a number of social issues. See section 2.1.5.4</p>

Criterion	Stakeholder Comment	JRC IPTS response
	<i>A general comment is that we think the number of criteria could be lowered in order to have more transparency. We know this is difficult, but a discussion if some criteria, which is not adding much value, could be deleted without giving up on the flexibility of the point system would be appropriate.</i>	Updated criteria The whole criteria set have been simplified. The criteria that were considered not relevant according to the environmental hotspots have been removed.
	<i>If breakfast is "offered" outside the structure (i.e. a public bar), even if the service is included in the price, since the service is not managed by the structure itself it should be excluded by the relevant criteria</i>	No change If the accommodation service offers this possibility the service provider will need to comply with the relevant criteria related to breakfast service. If the hotel service is very green but provides the breakfast (included in the price) in an external bar which is not green at all, we understood this as a bad practice.
	<i>Agreement on the scope was expressed by a stakeholder (consumer association) however clarification was requested to specify if green areas refers to those that under the management of the accommodation facility.</i>	No change We think that the definitions are clear in this sense. However, it could further clarified at the UM if needed.
	<i>Discussion on differentiation between ownership and management was raised. A stakeholder remarked that there are hotels that own and manage their buildings and is easy for them to meet criteria. However there are other hotels which are in buildings they lease and what they can influence in terms of building infrastructure is limited. It was highlighted that if not exception for those cases is considered, the number of applicants will be reduced especially given that a number of hotels have moved into franchise lease.</i>	No change. We think that most of the criteria are able to be complied independently if the applicants own or lease the accommodation service. However some exceptions could be included if specific impracticalities are raised by stakeholders during the revision of the criteria.
	<i>Concern was raised by a stakeholder (Competent Body) related to the fact that Tourist Accommodation criteria have been on the market for 7 years and one of the main points discussed at the EUEB is that stringency level should be increased. They did not see a clear increase of the ambition of criteria proposed</i>	Updated criteria In general the second proposal of the criteria aims to increase the ambition level while keeping as much as possible the maximum number of licence holders. The stringency levels of revised criteria have been increased, especially for electricity procurement, water environmental hot spots and social criteria.
	<i>A consumer organisation stakeholder suggested including a kind of social criteria facilitating the life for disable guests similar to criterion 79 which is facilitating trolleys.</i>	No change Focus on the environmental hotspots.
	<i>The real problem with the EU Ecolabel (before look at content of some criteria) is in the governance system that implements the EU Ecolabel. In particular, the rigid centralized national governance which do not allow short procedural times and do not favour flexibility and context specific-evaluation of the commitment and actions undertaken by the accommodation managers. It is fundamental to reorganise it in a decentralised way the current EU Ecolabel management system in all its functions, from training through support, through verification to the Ecolabel award. It is important to maintain a European and national coordination system, but it is also important to address the environmental impacts and related environmental management system from a perspective that is closer to the</i>	No change. The report is focus on the technical details and certain aspects of the EU Ecolabel as the governance structure of the scheme at each MS. However, the whole criteria set have been simplified in order to decrease the bureaucratic burden. Concerning the site visits, whether or not a site visit is undertaken during the period of the validity of the licence is

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	<i>accommodation-owner's context. One of our concrete suggestions is to introduce, while maintaining the transparency and credibility of a third party verification, before the official verification visit, a preliminary visit. In this visit, the competent body can collect all the basic documents usually sent to the competent body and make a preliminary evaluation about the fulfilment of the standards, helping the tourism provider find the best environmental solutions to reduce certain impacts of his/her service.</i>	optional. There have been many debates regarding this general principle between CBs. Some decide to always undertake an inspection visit and charge for it accordingly whilst others adopt a risk based approach in relation to non-compliance which can be influenced by many factors e.g. change of ownership, a complaint etc.
	<i>Qualita parco' - territorial and place-specific standards about communication and promotion of park activities- created an association to promote training, exchange experience and marketing activities. Strength of the project was its strong local link between the park and operators and territorial marketing, which tourists understand better. Its weakness was that there was no evidence that the QP translated into a market advantage. But was awarded Best Practice in CSR by the European Commission in 2009.</i>	The whole criteria set have been simplified in order to decrease the bureaucratic burden.
	<i>The EU Ecolabel does not create any feeling of aggregation among adherents and in most cases, the high bureaucratic investment requires paying an external consultant to externalize the application with no involvement of the hotel manager, and therefore, without understanding the management system. No training or public assistance for operators and no network is created. EU Ecolabel has not been perceived as a spendable certificate at market level and this has never been effectively commercialised. Moreover bureaucratic costs are aggravated by temporal costs as the documentation is sent to Ecolabel Unit in Rome and a year may pass before certification.</i>	
	<i>The provincial government provided economic assistance for the consultancy but this increased the number of adherents only temporarily and now this measure is completely useless. Members of the QP project have steadily grown. (see graph) Engagement in terms of time, investment and bureaucratic costs exceed the benefits (efficiency saving and market advantage).On the other hand, QP adherents do not testify economic advantages but at least they consider the network and relationship between the park authority and services valuable. The EU Ecolabel could be more effective if service providers are incentivised to understand the environmental impact and fund context-related solutions to reduce them. It is important that then criteria allow flexibility and identify place-specific solutions.</i>	No change. We think criteria set allows certain flexibility thanks to the structure of mandatory-optional criteria. The service providers will decide which criteria to meet among the optional criteria.
	<i>Bonus points should not be awarded only through the current general and unspecific section of "other additional environmental actions", which penalises all flexible place-specific structures, but every section (energy, water, etc) should have an "other environmental actions" section in which specific actions, that reduce specific impacts, should be awarded with bonus points?</i>	No change. We consider that the environmental hotspots are already covered and if environmental hotspot is identified during this revision should be covered as specific criteria.

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	<p>Verification standards and accreditation mechanisms should be simplified -simple wording and recognise place-specific and unforeseen best management practices and environmental management should not be aggravated by high bureaucratic costs. And it is important that monitoring of the consumption of the resources is facilitated by on-line and user-friendly interfaces (more user-friendly Excel sheets).</p>	
	<p><i>Training and network identification are pivotal to fostering environmental commitment, management and market communication. Training should be a compulsory criterion. Adhesion to a sustainability-related network should be a standard.</i></p>	<p>No change Updated Criterion staff training (See section 2.1.6.3) is mandatory.</p>
	<p><i>It is important that the Ecolabel addresses both local and global environmental impacts and incentivises accommodation owners to improve sustainability and their service in their natural surrounding and social and economic context. Maybe add a criteria that values local natural and cultural heritage - could include promotion of visits to local natural parks/organic farms, sponsorship of biodiversity protection activities/ historic and cultural initiatives.</i></p>	<p>No change Focus on the environmental hotspots.</p>



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