

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 v3 (TR 3.0):
Draft criteria proposal for revision of ecological criteria

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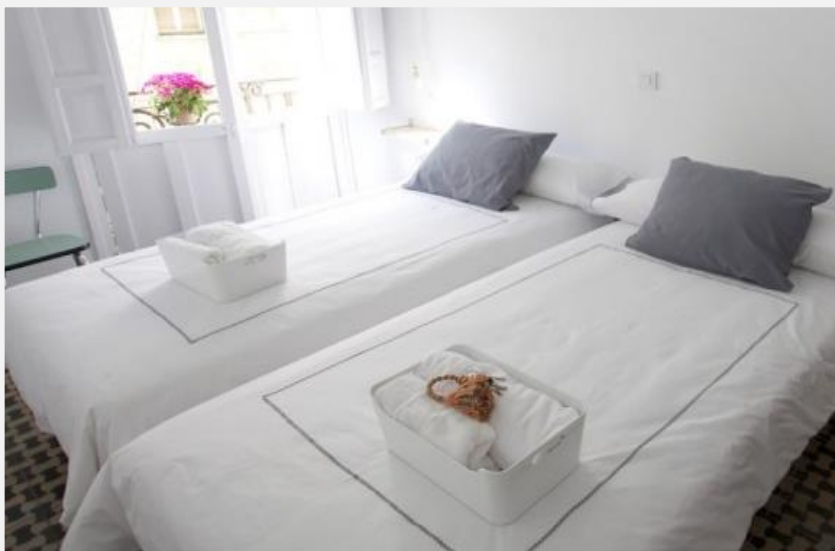


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1 Introduction

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) are being revised. This document is intended to provide the background information for the revision of the EU Ecolabel criteria for both services. 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.

The main purpose of this document is to evaluate the current criteria and discuss if the criteria are still relevant or should be revised, restructured or removed. This document is complemented and supported by the preliminary report¹ released in August 2014, which consists of a series of chapters addressing:

- scope and definition
- market analysis
- technical analysis
- improvement potential

and a first and second technical reports (TR1.0 and TR2.0, respectively) that were released in August 2014 and April 2015 including the first and second criteria proposals, as well as the feedback from the stakeholders of the project and further research carried out by this group of authors. The first draft version of the technical report (TR1.0) has built the basis for the first Ad-Hoc Working Group (AHWG) meeting taken place in October 2014. The second draft version of the technical report (TR2.0) was the basis of the discussions held during the second AHWG meeting placed in May 2015 in Brussels. The discussions held in both AHWG meetings are publicly available.

Moreover, during the course of the revision process, 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.. The specific information, views and suggestions arising from questions were reflected in the preliminary report and taken into consideration as far as possible in the proposals for the criteria revision. The above mentioned outputs are available at: http://susproc.jrc.ec.europa.eu/tourist_accommodation/stakeholders.html.

The current revised technical report (TR3.0) provides an update of the criteria development process based on new information (stakeholder's discussion at the 2nd AHWG meeting, further stakeholder inputs following the meeting, views and suggestions arising from stakeholders follow up and further desk research). The structure of this technical report has been slightly changed from previous technical reports. It consists of:

- **Introduction:** this section describes the goal and content of the document, the sources of information and the coming steps in the project. This section aims at being a link between the information and deliverables already published and the new draft of the criteria. Among the different sources of information listed and summarized in this section especial attention should be paid for the key environmental aspects of this product group and the criteria proposals.
- At the end of this section, a summary of the main changes introduced during the revision and the proposed structure of the criteria is included. In addition a text highlighting the synergies between EU Ecolabel and Eco-Management Audit Scheme (EMAS) has been included.
- **Assessment and verification:** this section includes information on the type of documentation required to show compliance with the criteria that shall be provided

¹ http://susproc.jrc.ec.europa.eu/tourist_accommodation/stakeholders.html

by applicants and recognised by Competent Bodies. In addition, the legal pre-requisites that applicant shall guarantee are also mentioned under this section.

- **Criteria proposal:** this section presents the last and most updated EU Ecolabel criteria proposals for the product group "Tourist Accommodation". The proposal is written in a blue box and subsequently a brief rationale is given. **Changes in the criteria text compared to the version published in April (TR2.0) are marked in blue colour.** Rationale is based on the most relevant aspects found out along the project
- **Impact of changes to criteria after AHWG2:** this section consist on a summary of the main changes on the structure and scoring rules of the revised criteria. In addition an indicative assessment of the level of ambition of the revised criteria and potential impacts on current licence holders and applicants is included under this section.
- **Table of comments:** this section consists of all the comments and feedback reported by the stakeholders from the 2nd AHWG meeting up to today in an anonymous way. The section is completed by the assessment of the stakeholder's feedback, further research on the points highlighted by the participants and how they triggered the changes on the criteria leading to the current criteria proposal.

Comments were classified under three categories:

- a) *Accepted:* the comment is fully integrated in the new criterion wording
- b) *Partially accepted:* this category includes those comments that either point out at a good idea that is integrated in the new criterion wording or suggest some modifications of the criteria wording and that even if they are not literally introduced, they are partially introduced.
- c) *Rejected:* the comment is not on board in the proposal. This fact can be due to different reasons such as lack of standards to perform the measurement, creation of market restrictions if the idea is integrated, etc

- **Annex I** includes the existing EU Ecolabel criteria for Tourist Accommodation/Campsite in order to allow the reader to consult current text. within this document

1.1 Methodology and sources of information

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 (e.g. Nordic Swan, Malta Eco certification, Green Key, Travelife sustainability criteria, Global Sustainable Tourism Criteria) and other definitions from sources such as EU datasets.

With regard to the market analysis, the study was mainly based on an analysis of European statistical data and available literature with a focus on tourist accommodations

The revision of the EU Ecolabel should be based on scientific evidence and should focus on the most significant environmental impacts during the whole life cycle of products. 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...).

A review of available Life Cycle Assessment (LCA) studies for tourism services has been undertaken with the aim to identify the main environmental areas of concern and life cycle hot-spots for tourist accommodation. In addition, 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. The BEMP technical report represents the scientific and technical basis of the Sectoral Reference Document (SRD) on Best Environmental Management Practice in the Tourism Sector which has been developed according to the Eco-Management and Audit Scheme (EMAS) regulation. 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 presents some shortcomings to robustly address the impacts associated with the effects of water consumption by products/services.

Finally, the revision of the EU Ecolabel criteria largely considers the specific information provided by the stakeholders during the two AHWG meetings held as well as during bilateral meetings. The information related to the revision of the EU Ecolabel criteria is summarized in the series of TRs while the information described above is mainly included in the preliminary report.

1.2 Summary of preliminary report and link to the EU Ecolabel criteria

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 Product group name, scope and definitions

Product group name:
tourist accommodation

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, **which are under management of the accommodation provider**.

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.

Rationale of proposed name, scope and proposed definitions

- 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. The stakeholder questionnaire and feedback received during the revision process revealed an overall support for merging TAS and CSS into a common set of criteria, titled “tourist accommodation”. 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. It is suggested that the current scope of the criteria be modified to consider merging TAS and CSS, although separate definitions should still be maintained for each.
- The current EU Ecolabel definition of TAS and CSS was assessed against a number of sources to determine its suitability. 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 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.
- The stakeholder questionnaire asked for feedback on the current EU Ecolabel definitions. 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 is suggested that the current scope of the criteria be extended to consider adding ‘conference facilities’ to the list of services provided.

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- In addition, a minor amendment has been introduced in the wording with the aim to specify that provision of food services, fitness and leisure activities, green areas and/or conference facilities are considered into the scope of the criteria if are under the management of the accommodation provider.

1.2.2 Key environmental aspects and relation with the criteria proposal

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.

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.

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

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

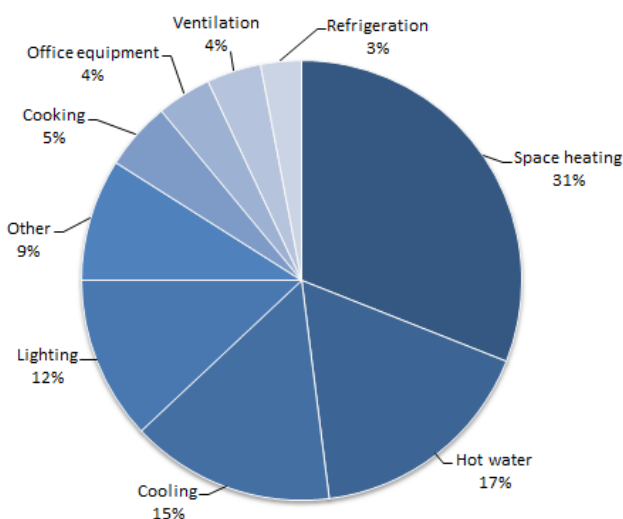
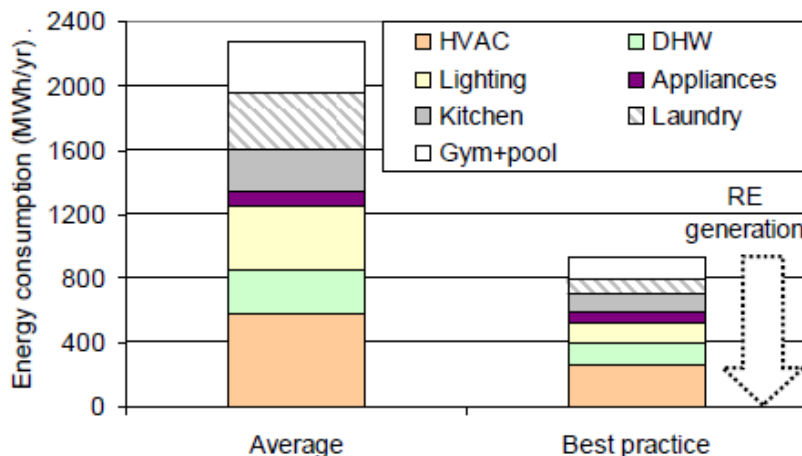


Figure 2 provides a modelled example of how good management can reduce energy use in a hotel by over 50%. Key areas where energy use can be significantly reduced include: heating, ventilation and air conditioning (HVAC); lighting; and laundry.

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.

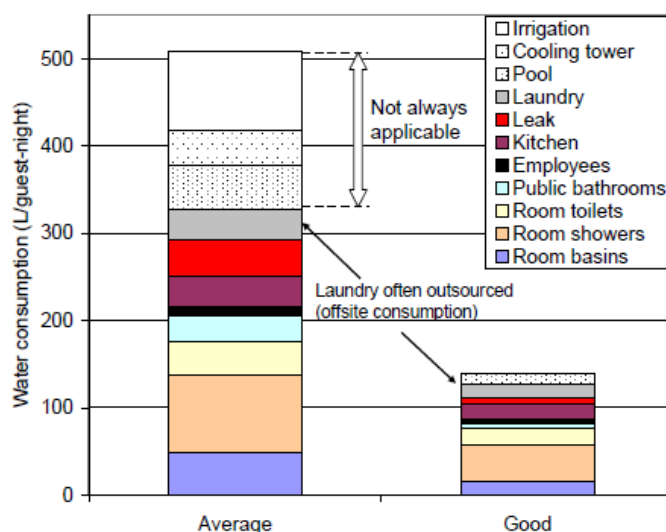
Once these measures to reduce energy demand have been implemented, further reductions in the use of primary energy can be made by increasing the supply of renewable energy; in particular, installing onsite systems such as geothermal, solar or wind.

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 1: 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]:

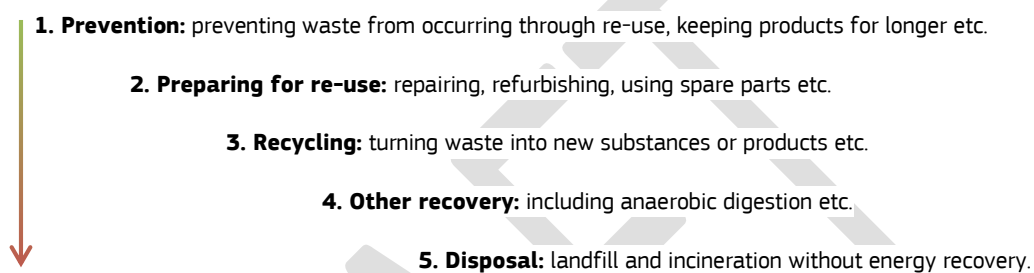
- Water system monitoring, maintenance and optimisation. Maintenance of water-using devices is important – this can prevent or detect any leaks. Monitoring water use through meters (and, where possible, sub-meters) can help tourist accommodation sites better manage and find areas to reduce water use.
- 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.

Waste generation and wastewater management

Waste generation is another significant aspect 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 address both environmental issues:

- 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 third 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 2. Link between the hotspots identified (BEMP and LCA) and the revised EU Ecolabel criteria. Criteria is either mandatory (M) or optional (O).

Section	Updated criteria	Current criteria	Environmental hotspot
General management	Environmental management systems and certification of service and suppliers		
	M1. Basis of an Environmental Management System	M25. Policy setting and environmental program	General (energy, water, waste, chemical use, procurement) <u>BEMP</u> encourages the implementation of an environmental management system as is encouraged through this revised criterion
	O22 - EMAS registration, ISO certification of the tourist accommodation (up to 5 points)	O93. EMAS or ISO registration of the tourist accommodation (up to 3)	General (energy, water, waste, chemical use, procurement) <u>BEMP</u> encourages the implementation of an environmental management system as is encouraged through this revised criterion
	O23 - EMAS registration or ISO certification of suppliers (up to 5 points)	O94. Suppliers EMAS or ISO registered (up to 1.5)	General (energy, water, waste, chemical use, procurement) <u>BEMP</u> encourages the implementation of an environmental management system as is encouraged through this revised criterion
	O24 - Ecolabelled services (up to 4 points)	O95. Subcontractors comply with mandatory criteria (up to 4 points)	General (energy, water, waste, chemical use, procurement) <u>BEMP</u> benchmark of excellence proposes all outsourced laundry to be carried out by a provider who has been awarded an ISO Type I ecolabel (e.g. Nordic Swan), and all in-house large-scale laundry operations, This is in line with the revised EU Ecolabel criteria.
	Training and information		
	M2. Staff training	M26. Staff training M17. Disinfectants	General (energy, water, waste, chemical use, procurement, transport) <u>BEMP</u> 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. This is in line with the revised EU Ecolabel criteria.
M3. Information to guests	M27. Information to guests M15. Correct waste water	General (energy, water, waste, transport) <u>BEMP</u> 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 is in line with the revised EU Ecolabel criteria. This criterion primarily focuses on providing information about the environmental	

Section	Updated criteria	Current criteria	Environmental hotspot
		disposal	objectives of the tourist accommodation.
	025 - Environmental and social communication and education (up to 3 points)	082. Environmental communication and education (up to 3 points)	General (energy, water, waste, biodiversity) 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 <u>EU Ecolabel</u> criterion for environmental communication and education. This is in line with the revised EU Ecolabel criteria.
Monitoring and maintenance			
	M4. General maintenance	M24. Maintenance and servicing of boilers and air conditioning systems	General (energy, water) BEMP and LCA 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.
	M5. Consumption monitoring	M28. Energy and water consumption data M29. Other data collection	General (energy, water) 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. In addition, BEMP suggest 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.
	026 – Consumption monitoring: Energy and water sub-metering (up to 2 points)	096. Energy and water meters (up to 2 points)	General (energy, water) BEMP encourages sub-metering and benchmarking all major energy/water-consuming processes and this is reflected in the current EU Ecolabel criterion and so no update is required.
Energy	Energy efficiency		
	M6 - Energy efficient space heating and water heating appliances	M3. Efficiency and heat generation	Energy consumption LCA: Concerning energy use, near to 78% of the total energy use during an assumed lifetime of 50 years, comes from the operation phase. BEMP: 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> ” EU Ecolabel: Requirement on efficient appliances for new acquisitions.

Section	Updated criteria	Current criteria	Environmental hotspot
	M7 - Energy efficient air conditioning and air-based heat pumps appliances	M4. Air conditioning	Energy consumption <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> . <u>EU Ecolabel</u> : Requirement on efficient appliances for new acquisitions.
	M8 - Energy efficient lighting	M9. Energy efficient light bulbs	Energy consumption <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.” <u>EU Ecolabel</u> : Requires a progressive replacement of lamps by efficient lamps (including LED) in order to not produce unnecessary waste.
	M9 - Automatic switching off of appliances/devices	M7. Switching off heating or air conditioning	Energy consumption <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. <u>BEMP</u> outlines that information should be provided to guests/staff to encourage switching off of air conditioning and lights where appropriate. In addition, automatic switching off of heating and cooling systems intelligent lighting control is encouraged as a method of saving energy. <u>EU Ecolabel</u> : Staff training and guest information is considered an important part of the policy to reduce energy consumption however the requirement on staff/guest information concerning turn off appliances has been moved to the corresponding criteria for information provision. The revised criterion requires automatic switch off systems for new appliances and renovations.
		M8. Switching off lights	
	M10 - Outside heating and air conditioning appliances	M10. Outside heating appliances	Energy consumption 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. <u>EU Ecolabel</u> : Total restriction of outside heating appliances.
	O27 - Energy efficient space heating and water heating appliances (up to 3 points)	O33. Boiler energy efficiency (1.5 points)	Energy consumption <u>EU Ecolabel</u> : It promotes the use of most efficient HVAC systems in agreement with LCA/BEMP recommendations specified above.
	O28 - Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)	O41. Air conditioning (2 points)	Energy consumption <u>BEMP</u> : specifies that air conditioning systems should be energy efficient, properly maintained and appropriately used. <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. <u>EU Ecolabel</u> : The current criterion ensures that the system used is efficient.
	O29 – Air-based heat pumps up to	O37. Heat pump (2 points)	

Section	Updated criteria	Current criteria	Environmental hotspot
	100 kW heat output (3 points)		
	030 - Energy efficient household appliances (up to 4 points)	044. Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumbler and office equipment (up to 3 points)	<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>
	031 - Heat recovery (up to 3 points)	038. Heat recovery (1.5 points)	<p>Energy consumption</p> <p><u>BEMP</u> is to encourage the installation of heat recovery systems where possible. “To minimise energy consumption from HVAC systems by installing zoned temperature control and controlled ventilation with <u>heat recovery</u> (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.</p> <p>This is in line with the revised EU Ecolabel criteria.</p>
	032 - Thermoregulation (up to 3 points)	039. Thermoregulation (1.5 points)	<p>Energy consumption</p> <p><u>BEMP</u> 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 CO₂ sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics.</p> <p>This is in line with the revised <u>EU Ecolabel</u> criteria.</p>
	033 - Automatic switch off appliances/devices (up to 4.5)	042. Automatic switching-off of air conditioning and heating systems (1.5 points) 047. Automatic switching off lights in tourist accommodation (1.5 points)	<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 automatic switching off of heating and cooling systems intelligent lighting control is encouraged as a method of saving energy.</p> <p>This is in line with the revised <u>EU Ecolabel</u> criteria.</p>

Section	Updated criteria	Current criteria	Environmental hotspot
		O50. Automatic switching off outside lights (1.5 points)	
	O34 - District heating/cooling and cooling from cogeneration (up to 4 points)	O35. District heating (1.5 points)	<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>
		O36. Cogeneration (1.5 points)	
	O35 - Electric hand driers with proximity sensor (1 point)	O45. Hand driers with sensors (2 points)	<p>Energy consumption</p> <p>No specific mention on LCA/BEMP. 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.</p>
	O36. Space Heater NOx emissions (1.5 points)	O34. Boiler NOx (1.5 points)	<p>Energy consumption</p> <p><u>BEMP</u>: There is no specific BEMP guidance for setting limits for boiler NOx emissions. However, <u>regular maintenance of all HVAC equipment is encouraged</u>.</p> <p>This is the line with the revised EU Ecolabel criteria</p>
Energy from renewable sources			
	M11 - Procurement of electricity from a renewable electricity supplier	M1. Electricity from renewable sources	<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.</p>
	M12 - 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> <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>

Section	Updated criteria	Current criteria	Environmental hotspot
			<u>EU Ecolabel</u> : It poses restrictions on coal/heavy oil as a heating sources
	O37 - Procurement of electricity from a renewable electricity supplier (4 points)	-----	<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 labelled green electricity (100% from RES).</p>
	O38 - On site self-generation of electricity through renewable energy sources (up to 5 points)	O31. Renewable electricity generation (up to 4 points)	<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>
	O39 - Heating energy from renewable energy sources (up to 2 points)	O32. Energy from renewable sources (up to 2 points)	<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>
	O40 - Swimming pool heating (up to 1.5 points)	O49. Swimming pool heating with renewable energy sources(up to 1.5 points)	<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>
Water	Efficient water devices		
	M13 – Efficient water fittings: Bathroom taps and showers	M11. Water flow from taps and showers	<p>Water consumption</p> <p><u>BEMP</u> identifies water use in tourist accommodation 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).</p> <p><u>BEMP</u> for water flow is “to minimise water consumption through the installation of low-flow taps and showers” and proposes as a benchmark of excellence: Shower flow rate ≤ 7 L/min and bathroom tap flow rate ≤ 6 L/min.</p> <p>There is a real opportunity for tourist accommodations to better manage water consumption, reducing their environmental burden and potential high cost of water use.</p> <p>The EU Ecolabel criterion set mandatory criterion at 8 litres/minute.</p>

Section	Updated criteria	Current criteria	Environmental hotspot
	M14 - Efficient water fittings: toilets and urinals	M13. Urinal flushing	Water consumption <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.
	O41 - Efficient water fittings: Bathroom taps and showers (up to 4 points)	O53. Water flow from taps and showerheads (1.5 points)	Water consumption <u>BEMP</u> for water flow is “to minimise water consumption through the installation of low-flow taps and showers” and proposes as a benchmark of excellence: Shower flow rate ≤ 7 L/min and bathroom tap flow rate ≤ 6 L/min. It is suggested for the EU Ecolabel criterion to compromise by adjusting the limit to 6 litres/minute, which is the limit allowed for EU Ecolabel sanitary tapware. Additionally, a requirement on labelled taps and shower heads has been proposed.
	O42 - Efficient water fittings: Toilets and urinals (up to 4.5 points)	O54. WC flushing (1.5 points) O62. Water saving urinals (1.5 points)	Water consumption <u>BEMP</u> measures are outlined as the “Installation or retrofitting of controlled-flush or <u>waterless urinals</u> ”. 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
	O43 - Dishwasher water consumption (2.5 points)	O55. Dishwasher water consumption (1 point)	Water consumption <u>BEMP</u> Selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption is best practice. 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.
	O4 - Washing machine water consumption (3 points)	O56. Washing machine water consumption (1 point)	Water consumption <u>BEMP</u> Selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption is best practice. Benchmark for commercial washing machines is to have an average laundry water consumption ≤ 7 L per kg of laundry washed. 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 and BEMP benchmark for commercial appliances.
Automatic devices and/or procedures to decrease water consumption			
	M15 – Reduction in laundry achieved through reuse of towels and bedclothes	M14. Changing towels and sheets	Water consumption <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 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”.
	O45 - Indications on water hardness	O61. 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

Section	Updated criteria	Current criteria	Environmental hotspot
	(up to 1 point)	(up to 2 points)	incorrect dilution. Dilution volumes should be adjusted for water hardness.” This is covered in the EU Ecolabel criterion.
	046 Optimised pool management (up to 3 points)	059. Swimming pool cover (1 point) 068. Swimming pools: Dosage of disinfectants or natural/ecological swimming pools(1 point)	Water consumption BEMP for the operating of swimming pools does suggest: o The correct use of pool covers to reduce heat loss. o Minimisation of chlorine consumption through optimised dosing and use of supplementary disinfection methods such as ozonation and UV treatment. o In addition, natural pool installation is suggested: The on-site swimming pool(s) incorporate(s) natural plant-based filtration systems to achieve water purification to the required hygiene standard. This is in accordance with the current EU Ecolabel criterion however the criterion has been modified to better reflect the benchmarks of excellence suggested in BEMP. The title has been amended to better reflect the aim of the criterion.
	047 -Rainwater and grey water recycling (up to 3 points)	051. Use of rainwater and recycled (up to 4 points)	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.
	048 - Efficient irrigation (up to 1.5 points)	052. Automatic watering systems for outside areas (1.5 points)	Water consumption <u>BEMP</u> specifies that water consumption for irrigation should be minimised. EU Ecolabel promotes the use of automatic system and the training of the staff to carry out efficient irrigation.
	049 - Indigenous species used in outdoor planting (1 point)	63. Indigenous species outdoor planting (1 point)	Water consumption Best practice measures for tourist accommodation include “Planting of green areas with native 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.
Waste and wastewater	Waste prevention through reduction and procurement		
	M16 – Waste prevention: Food service waste reduction plan	M21. Breakfast packaging	Waste generation <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> ” <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).

Section	Updated criteria	Current criteria	Environmental hotspot
	M17 - Waste prevention: Disposable items	M20. Disposable 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.</p> <p><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.”</p> <p>This is in line with the EU Ecolabel criterion which restricts the use of a number of disposable products.</p>
	O50 –Paper Products (up to 2 points)	O88. Paper products (up to 3 points)	<p>Procurement & Waste generation</p> <p><u>BEMP</u> 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 <u>EU Ecolabel</u> criteria for paper products.</p>
	O51 - Durable goods (up to 3 points)	O89. Durable goods (up to 3 points)	<p>Procurement & Waste generation</p> <p>In general, <u>BEMP</u> 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.</p>
	O52 - Beverages provision (2 points)	O73: Disposable drink containers O86. Refillable bottles (3 points)	<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.</p> <p><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>
	O53 - Detergents and toiletries procurement (up to 2 points)	O64. Detergents (up to 3 points)	<p>Waste generation & Chemicals use</p> <p><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.</p> <p>This criterion is in line with the BEMP guideline.</p>

Section	Updated criteria	Current criteria	Environmental hotspot
	054 - Chemical use minimisation (1.5 point)	069. Mechanical cleaning (1 point)	Waste generation & Chemicals use 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.” This is in line with the EU Ecolabel criterion
	055 - De-icing (1 point)	060. De-icing (1.5 point)	Waste generation & Chemicals use 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.
Re-use goods			
	056 - Used textiles and furniture (2 points)	076. Used textiles, furniture and other products (3 points)	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 and recycling waste			
	M18 - Waste sorting and sending for recycling	M12. Waste bins in toilets M18. Waste separation by guests M19. Waste separation 074. Fat/oil disposal (2 points)	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.
	057 - Composting (up to 2 points)	072. Composting (2 points)	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.
Waste water management and treatment			

Section	Updated criteria	Current criteria	Environmental hotspot
	O58 - Waste water treatment (up to 3 points)	M16. Disposal Point (CSS) O66. Car washing in specially outfitted areas (1 point)	wastewater management 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. .This is the line with the revised EU Ecolabel criteria
Other criteria	M19 - No smoking in common areas	M22. 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.
	M20 - Promotion of environmentally preferable means of transport	M23. Public transportation	Transportation LCA revealed that transport system has a higher impact than accommodation services itself in the <u>acidification (AP) and abiotic depletion (ADP)</u> 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.
	M21 - Information appearing on the EU Ecolabel	M30. 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.
	O59 - No smoking in rooms (up to 1.5 points)	O83. No smoking (up to 1.5 points)	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.
	O60- Social policy (up to 2 points)	-----	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.
	O61 - Tourist accommodation traffic management (up to 2 points)	O77. Regulation of campsite traffic (campsite only) (1 point)	Transportation BEMP is to regulate traffic effectively to ensure minimisation of emissions. EU Ecolabel criterion is in line with this.

Section	Updated criteria	Current criteria	Environmental hotspot
	to 1.5 points)	078. Campsite generated traffic (campsite only) (1 point)	
	062 - Environmentally preferable means of transport offer (up to 2.5 points)	084. Bicycles (1.5 points) 079. Trolleys for guests (campsite only) (1 point) 085. Pick up service (1 point)	Transportation <u>BEMP</u> 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 <u>EU Ecolabel</u> criteria suggest to require a higher number of bicycles available than current criterion.
	063 - Unsealed surfaces (0.5 point)	080. Unsealed surfaces (campsite only) (1 point)	Outside areas <u>BEMP</u> 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 associated to runoff from sealed asphalt surfaces, leading to a positive impact on biodiversity and wastewater management. EU Ecolabel promotes unsealed surfaces.
	064 - Local and organic products (up to 3 points)	090. Local food products (up to 3 points) 091. Organic food (up to 3 points)	Procurement and transport <u>BEMP</u> 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.” <u>BEMP</u> 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.” In general, it is considered best practice to source all products locally and organic where possible This is the line with the revised EU Ecolabel criteria
	065 - Pesticide avoidance (2 points)	070. Organic gardening (2 points)	Outside areas <u>BEMP</u> suggests minimising the use of pesticides and other chemicals throughout the tourist accommodation. This corresponds with existing EU Ecolabel criteria.
	066 - Additional environmental and social actions (up to 4 points)	097. Additional environmental and social actions (up to 4 points)	
Removed			
	Partially addressed in pre-requisite	M5. Energy efficiency of	These criteria are mostly addressing legal requirements and as the EU Ecolabel is a label of excellence it has been decided to include these requirements in the pre-requisite section.

Section	Updated criteria	Current criteria	Environmental hotspot
	section	buildings M6. Window Insulation M15. Correct wastewater disposal	
	-----	040. Energy performance audit	<p>With the aim being to simplify the criteria set and to focus on environmental hotspots, it is suggested that these criteria are removed as a number of other EU Ecolabel criteria are already addressing the main environmental hotspots for tourist accommodation. In addition, the analysis carried out for 693 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the low impact criteria revealed a low fulfilment for these criteria compare to other optional criteria. (See section 4.Impact of changes to criteria after AHWG2)</p>
	-----	043. Bioclimatic architecture	
	-----	046. Refrigerator positioning	
	-----	57. Tap water temperature and flow	
	-----	58. Shower timers	
	-----	65. Indoor and outdoor paints and varnishes	
	-----	071. insect and pest repellents	
	-----	075. Run-off from car parks (campsite only)	
	-----	087. Use of rechargeable products	
	-----	081. Roof landscaping	
	-----	092. Indoor air quality	

1.3 Proposed framework for the revision of the EU Ecolabel criteria and main changes

Changes to the existing criteria have been made based on the following main sources of information:

- Regulation: changes to regulation (where applicable) since the previous revision of the TAS and CSS criteria.
- Feedback: feedback from stakeholders (including current licenceholders) and information from various organisations and government bodies engaged in the tourist accommodation industry.
- LCA/BEMP: LCA review and best environmental management practices for tourist accommodation.
- Other updates: including the revision of development of EU Ecolabel criteria for other product groups, relevant information from technical analysis (other than LCA/BEMP), or comparison with other ecolabels.
- In addition, simplification of the criteria structure and clarification of the wording of the criteria has been relevant aspects to be considered during this revision.

The proposed criteria structure is presented in Table 3 and Table 4. The tables shows the simplification, merging of criteria addressing same hotspot and reordering process that the EU Ecolabel criteria for Tourist accommodation have undergone in along this revision process with the aim to make it more simple and focused on environmental hotspots. Detailed information on rationale for changes for each individual criterion is presented in section 3. Furthermore, information with regard to the ambition level, criteria structure, scoring rules and potential impact of the revised criteria on applicants is detailed in section 4 of the present document.

Table 3 Comparison of the criteria sections

Current sections	Proposed sections
Energy	Energy
Water	Water
Detergent and disinfectants (reallocated under other sections)	-----
Waste	Waste and wastewater
Other services (several criteria reallocated under other sections)	Other criteria
General management	General management

Table 4 Proposed criteria structure and comparison with current criteria. Criteria is either mandatory (M) or optional (O).

Proposed sections	Proposed simplified criteria	Current EU Ecolabel
General management	M1. Basis of an Environmental Management System	M25. Policy setting and environmental program
	M2. Staff training	M26. Staff training (& M17. Disinfectants)
	M3. Information to guests	M27. Information to guests (& M15. Correct waste water disposal)
	M4. General maintenance	M24. Maintenance and servicing of boilers and air conditioning systems

Proposed sections	Proposed simplified criteria	Current EU Ecolabel
	M5. Consumption monitoring	M28. Energy and water consumption data M29. Other data collection
	O22 - EMAS registration, ISO certification of the tourist accommodation (up to 5 points)	O93. EMAS or ISO registration of the tourist accommodation (up to 3)
	O23 - EMAS registration or ISO certification of suppliers (up to 5 points)	O94. Suppliers EMAS or ISO registered (up to 1.5)
	O24 - Ecolabelled services (up to 4 points)	O95. Subcontractors comply with mandatory criteria (up to 4 points)
	O25 - Environmental and social communication and education (up to 3. points)	O82. Environmental communication and education (up to 3 points)
	O26 – Consumption monitoring: Energy and water sub-metering (up to 2 points)	O96. Energy and water meters (up to 2 points)
Energy	M6 - Energy efficient space heating and water heating appliances	M3. Efficiency and heat generation
	M7 - Energy efficient air conditioning and air-based heat pumps appliances	M4. Air conditioning
	M8 - Energy efficient lighting	M9. Energy efficient light bulbs
	M9 - Automatic switching off of appliances/devices	M7. Switching off heating or air conditioning M8. Switching off lights
	M10 - Outside heating and air conditioning appliances	M10. Outside heating appliances
	M11 - Procurement of electricity from a renewable electricity supplier	M1. Electricity from renewable sources
	M12 - Coal and heavy oils	M2. Coal and heavy oils
	O27 - Energy efficient space heating and water heating appliances (up to 3 points)	O33. Boiler energy efficiency (1.5 points)
	O28 - Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)	O41. Air conditioning (2 points)
	O29 – Air-based heat pumps up to 100 kW heat output (3 points)	O37. Heat pump (2 points)
	O30 - Energy efficient household appliances (up to 4 points)	O44. Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumbler and office equipment (up to 3 points)
	O31 - Heat recovery (up to 3 points)	O38. Heat recovery (1.5 points)
	O32 - Thermoregulation (up to 3 points)	O39. Thermoregulation (1.5 points)
	O33 - Automatic switch off appliances/devices (up to 4.5)	O42. Automatic switching-off of air conditioning and heating systems (1.5 points)
		O47. Automatic switching off lights in tourist accommodation (1.5 points)
		O50. Automatic switching off outside lights (1.5 points)
	O34 - District heating/cooling and cooling from cogeneration (up to 4 points)	O35. District heating (1.5 points)
		O36. Cogeneration (1.5 points)
	O35 - Electric hand driers with proximity sensor (1 point)	O45. Hand driers with sensors (2 points)

Proposed sections	Proposed simplified criteria	Current EU Ecolabel	
	036. Space Heater NOx emissions (1.5 points)	034. Boiler NOx (1.5 points)	
	037 - Procurement of electricity from a renewable electricity supplier (4 points)	-----	
	038 - On site self-generation of electricity through renewable energy sources (up to 5 points)	031. Renewable electricity generation (up to 4 points)	
	039 - Heating energy from renewable energy sources (up to 2 points)	032. Energy from renewable sources (up to 2 points)	
	040 - Swimming pool heating (up to 1.5 points)	049. Swimming pool heating with renewable energy sources(up to 1.5 points)	
Water	M13 – Efficient water fittings: Bathroom taps and showers	M11. Water flow from taps and showers	
	M14 - Efficient water fittings: toilets and urinals	M13. Urinal flushing	
	M15 – Reduction in laundry achieved through reuse of towels and bedclothes	M14. Changing towels and sheets	
	041 - Efficient water fittings: Bathroom taps and showers (up to 4 points)	053. Water flow from taps and showerheads (1.5 points)	
	042 - Efficient water fittings: Toilets and urinals (up to 4.5 points)	054. WC flushing (1.5 points) 062. Water saving urinals (1.5 points)	
	043 - Dishwasher water consumption (3 points)	055. Dishwasher water consumption (1 point)	
	044 - Washing machine water consumption (3 points)	056. Washing machine water consumption (1 point)	
	045 - Indications on water hardness (up to 1.5 points)	061. Indication on water hardness (up to 2 points)	
	046 Optimised pool management (up to 3 points)	059. Swimming pool cover (1 point) 068. Swimming pools: Dosage of disinfectants or natural/ecological swimming pools(1 point)	
	047 -Rainwater and grey water recycling (up to 3 points)	051. Use of rainwater and recycled (up to 4 points)	
	048 - Efficient irrigation (up to 1.5 points)	052. Automatic watering systems for outside areas (1.5 points)	
	049 - Indigenous species used in outdoor planting (1 point)	63. Indigenous species outdoor planting (1 point)	
	Waste and wastewater	M16 – Waste prevention: Food service waste reduction plan	M21. Breakfast packaging
		M17 - Waste prevention: Disposable items	M20. Disposable products
M18 - Waste sorting and sending for recycling		M18. Waste separation by guests M12. Waste bins in toilets M19. Waste separation 074. Fat/oil disposal	
050 –Paper Products (up to 2 points)		088. Paper products (up to 3 points)	
051 - Durable goods (up to 3 points)		089. Durable goods (up to 3 points)	
052 - Beverages provision (2 points)		086. Refillable bottles (3 points)	
053 - Detergents and toiletries procurement (up to 2 points)		064. Detergents (up to 3 points)	

Proposed sections	Proposed simplified criteria	Current EU Ecolabel
	054 - Chemical use minimisation (1.5 point)	069. Mechanical cleaning (1 point)
	055 - De-icing (1 point)	060. De-icing (1.5 point)
	056 - Used textiles and furniture (2 points)	076. Used textiles, furniture and other products (3 points)
	057 - Composting (up to 2 points)	072. Composting (2 points)
	058 - Waste water treatment (up to 3 points)	M16. Disposal Point (CSS) 066. Car washing in specially outfitted areas (1 point)
Other criteria	M19 - No smoking in common areas	M22. No smoking in common areas
	M20 - Promotion of environmentally preferable means of transport	M23. Public transportation
	M21 - Information appearing on the EU Ecolabel	M30. Information appearing on the eco-label
	059 - No smoking in rooms (up to 1.5 points)	083. No smoking (up to 1.5 points)
	060- Social policy (up to 2 points)	-----
	061 - Tourist accommodation traffic management (up to 1.5 points)	077. Regulation of campsite traffic (campsite only) (1 point) 078. Campsite generated traffic (campsite only) (1 point)
	062 - Environmentally preferable means of transport offer (up to 2.5 points)	084. Bicycles (1.5 points) 079. Trolleys for guests (campsite only) (1 point) 085. Pick up service (1 point)
	063 - Unsealed surfaces (0.5 point)	080. Unsealed surfaces (campsite only) (1 point)
	064 - Local and organic products (up to 3 points)	090. Local food products (up to 3 points) 091. Organic food (up to 3 points)
	065 - Pesticide avoidance (2 points)	070. Organic gardening (2 points)
	066 - Additional environmental and social actions (up to 4 points)	097. Additional environmental and social actions (up to 4 points)
<i>Addressed under pre-requisites section</i>	-----	M5. Energy efficiency of buildings
	-----	M6. Window insulation
	-----	M15. Correct wastewater disposal
	-----	040. Energy performance audit
	-----	043. Bioclimatic architecture
	-----	046. Refrigerator positioning
	-----	57. Tap water temperature and flow
	-----	58. Shower timers
	-----	65. Indoor and outdoor paints and varnishes
	-----	071. insect and pest repellents
	-----	075. Run-off from car parks (campsite only)
	-----	087. Use of rechargeable products
	-----	081. Roof landscaping
-----	092. Indoor air quality	

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

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

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

On the other hand, EU Ecolabel criteria are set in order to correspond indicatively to the best 10-20% of the products or services available on the Community market in terms of environmental performance throughout the life-cycle. Within this proposal for the EU Ecolabel for Tourist Accommodation, specific requirements are set for the provision of services and the related use of products and equipment. Furthermore, 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. Thus, the revised proposal suggests the inclusion of social criteria aligned to other environmental schemes that deal with wider sustainability issues. The identified thresholds constitute pass and fail requirements for awarding the EU Ecolabel. The EU Ecolabel is awarded after a third party verification.

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

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

The proposal for the EU Ecolabel criteria for the service group of Tourist Accommodation is an example of how the two voluntary frameworks can complement each other. [Criterion 1: Basis of an Environmental Management System](#), [Criterion 5: Consumption monitoring](#) and [Criterion 22: EMAS registration, ISO 14001 certification of the Tourist Accommodation](#) show the synergies between the EU Ecolabel criteria and EMAS. As part of a mandatory requirement, criterion 1, the company is required to have implemented the basic requirements of an Environmental Management System. As part of the optional requirement 22, the accommodation is required to provide evidence of EMAS registration or ISO 14001 certification. In addition, mandatory criterion 5 uses several of the main indicators proposed by the Sectoral Reference Document assuring that key consumption activities of the tourist accommodation are monitored according to harmonized indicators. These three criteria help ensure that there is a company-wide awareness of environmental issues and the rest of the

EU Ecolabel criteria set performance activities, procedures or thresholds for different aspects of the service based on LCA identified hotspots, benchmarks of excellence from the Sectorial Reference Document, other environmental labels and best performing services on the market.

2 ASSESSMENT AND VERIFICATION

Assessment and verification

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

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

Competent Bodies shall preferentially recognise attestations which are issued by bodies accredited according to the relevant harmonised standard for testing and calibration laboratories and verifications by bodies that are accredited according to the relevant harmonised standard for bodies certifying products, processes and services.

Information extracted from EMAS environmental statements are considered equivalent means of proof as the attestations mentioned in the previous paragraph.

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

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

Competent Bodies will carry out an initial on-site visit before the award concession and may perform follow up on-site visits periodically during the award period.

As pre-requisite, the services must meet all respective legal requirements of the country (countries) in which it is located. In particular, it shall be guaranteed that:

1. The physical structure respects Community, national and local laws and regulations regarding energy efficiency and thermal insulation, water sources, water treatment and disposal (including chemical toilets), waste collection and disposal, maintenance and servicing of equipment, safety and health dispositions and any relevant laws or regulations of the area related to landscape and biodiversity conservation.
2. The enterprise is operational and registered, as required by national and/or local laws and its staff are legally employed and insured. For this purpose, staff shall have a national legal written contract, shall be paid at a minimum legal wage, and shall have working hours complying with the national law.

The applicant shall declare and demonstrate the service's compliance with these requirements, using independent verification or documentary evidence without prejudice of data protection national law (e.g. construction license/authorization, declarations of professional technicians explaining how national legislation and local regulations related to the above mentioned aspects of the building are met, copy of a written social policy, copies of contracts, statements of employee's registration in the social security/national insurance system, official documentation/register recording the names and no. of employees by the local Government's Employment Inspectorate or Agent) and/or direct random staff interview during on-site visit.

Rationale

- The assessment and verification text refers to the different type of evidence that is considered as relevant for the each type of criteria and include the revised harmonized text which is included in the most recently adopted EU Ecolabel criteria.
- The EU Ecolabel Regulation (EC) No 66/2010 indicates that Competent Bodies shall preferentially recognise verifications performed by bodies which are accredited under the EN 45011. However, this standard is nowadays phased-out and certification bodies are no longer accredited in accordance with these requirements. A new statement has been included in the text.
- Where appropriate, test methods other than those indicated for each criterion may be used if the component body assessing the application accepts their equivalence. Against this background and considering the complementarity among EU Ecolabel and EMAS, a specification has been introduced to consider statements extracted from EMAS declarations as equivalent means of proof as the attestations.
- In addition, a specific text in reference to a mandatory initial on-site visit and optional follow up on-site visits has been introduced with the aim to reflect the general agreement on the importance of having at least a mandatory on-site visit before the awarding of the license for this product group.
- Legal pre-requisites required in the current EU Ecolabel for TAS and CSS text in force are proposed to be maintained. However the text has been amended as follow:
 - The point 1 has been further specified to address three of the current criteria: M5. Energy efficiency of buildings, M6. Window Insulation and M16. Chemical Toilet Disposal (See [annex I](#) for current criteria) as they are mainly addressing legal requirements.
 - The social part (point 2) has been extended to better reflect staff legal requirements. The text is suggested to be further specified by introducing specifications provided within the Sustainable Restoration Scheme (<http://www.thesra.org/>) as suggested by stakeholders, which baseline criteria are written contract, minimum legal wage and working hours in accordance with the national law.
 - The text for assessment the prerequisites has been amended to request additional evidence to show compliance for the legal requirements. The documentary evidence has been further detailed. Furthermore, it is suggested to include the possibility to allow Competent Body that considers relevant to have a higher degree of assurance performing random interview during the on-site visit. Additionally, there is an optional social requirement which includes a written social policy that could be used as a mean of proof for pre-requisites and the optional one. (see section 3.10.2)

3 CRITERIA PROPOSAL

3.1 Mandatory criteria related to general management

3.1.1 Criterion 1: **Basis of an Environmental Management System**

Proposal for criterion 1: Basis of an Environmental Management System

The tourist accommodation shall set the basis of an Environmental Management System by implementing the following processes.

Proposal for criterion 1: Basis of an Environmental Management System

- a) An environmental policy identifying the most relevant direct and indirect environmental impacts and an organisational policy towards those potential impacts.
- b) A precise action programme establishing targets on environmental performance regarding energy, water, chemicals and waste, which shall be set at least every two years, taking into consideration requirements and data collected in this EU Ecolabel criteria set. Best environmental management practice, environmental performance indicators and benchmarks of excellence set by the reference document on best environmental management practice for the tourism sector (EMAS) should be taken into account when deemed relevant with regard to the identified environmental impacts.
- c) An internal audit process allowing verifying at least every two years organisation performances with regard to the targets defined in the action program.
- d) A short environmental report summarising the conclusion of the audit process should be drafted and made available after each internal audit.

Information on the above mentioned processes shall be available for consultation by the guests/staff.

Comments and feedback from guests collected by means of the questionnaire referred in criterion 3 shall be evaluated in the internal audit process and in the action programme, if necessary.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a copy of the environmental policy, the action programme and the procedures for taking into account input from guests. The audit report and the environmental report shall be made available to the Competent Body as soon as possible after the application, and every two years.

Applicants registered under EMAS or certified according to ISO 14001 will be deemed to comply. In this case, ISO 14001 certificate and/or EMAS registration shall be provided as a means of proof. However, in case of ISO 14001 certification, an environmental report summarising performances with regard to the targets defined in the action programme should be joined to the application.

Rationale of Proposed Criterion text

- At the TR2.0 current criterion *M 25: Policy setting and environmental programme Disinfectants* (See [annex I](#) for current criteria) was proposed to be deleted, instead more points were suggested for EMAS and ISO criteria in order to recognise the potential environmental benefit associated to third party EMSs. Overall stakeholders showed disagreement on its deletion as support for this criterion as it would help companies that do not have an EMS set –up to put in place the most important parts of one. This is especially important in the case of SMEs as their limited resources can be an obstacle to getting an ISO14001 certification or EMAS registration. (See section 5 for stakeholder comments).

- Against this background it is suggested to reintroduce the criterion and to modify the criterion text in order to better define the requirements.
- The criterion, as proposed, does not require the implementation of a full EMS but rather of the main aspects of one, which should limit the burdens on the tourist accommodation while still providing environmental benefits. Moreover, companies that take the initiative of implementing the principles of the environmental management system should be recognised. The new proposed criterion text contains explicit information stating what measures the company must put in place in order to have the basis for an EMS, although not EMS is required. In order to facilitate the verification and assessment of the criterion, companies that already have a certified or registered EMS are considered as complying with the criterion.
- In addition to the targets on environmental performance of the EU Ecolabel criteria, benchmarks of excellence set by the reference document on best environmental management practice for the tourism sector (EMAS) are specified to be considered in the set-up of the action plan.

Rationale of proposed "Assessment and verification"

- In addition to the declaration of compliance, the applicant is requested to provide the following evidence:
 - a copy of the environmental policy,
 - the action programme and
 - the procedures for taking into account input from guests.
- Considering that results from the audit might not be available at the application, it has been specified that the environmental report shall be made available to the Competent Body as soon as possible after the application.
- Furthermore for companies having an EMAS registration and/or ISO 1400 certification are proposed to be deemed to comply with this requirement. However, considering that ISO 14001 does not cover integrally all the aspects covered by EMAS, in case of ISO 14001 certification it has been specified that an environmental report should be joined to the application.

3.1.2 Criterion 2: - Staff training

Proposal for criterion 2: - Staff training

- a) The tourist accommodation shall provide information and training to the staff (including subcontracted external staff), including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. In particular, the following aspects shall be included on the staff training:
- Environmental policy and action plan of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation.
 - Energy saving actions in relation to lights, air conditioning and heating systems

Proposal for criterion 2: - Staff training

- when the staff leave the room and/or windows are opened.
- iii. **Water saving actions** in relation to leaks checking, watering, changes of sheets and towels frequency and backwashing pool procedure.
 - iv. **Chemical use minimisation actions in relation to chemical products for cleaning, dishwashing, sanitising, laundry and other special cleaners (e.g. swimming pool backwashing)** which shall be used only where they are necessary and if information available, the consumption limits of the mentioned products shall be those indicated on the packaging or recommended by the producer.
 - v. **Waste reduction and separation actions** in relation to disposable items and disposal categories.
 - vi. **Environmentally preferable means of transport available to staff.**
- b) 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.

Rationale of Proposed Criterion text

- 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 proposed criterion includes a section 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 training (rather than repeating the same training routine) at least once a year
- As a result from last comments received after AHWG2 (See section 5 for stakeholder comments), the text has been simplified in order to allow some flexibility to applicants and to not repeat the requirements already mentioned along the criteria set. Instead, a text specifying that information and training to the staff shall be done in accordance with the mandatory and applicable optional criteria in this EU Ecolabel is introduced.
- In addition, a requirement on chemical use minimisation actions has been introduced. This is an adapted version of current *criterion 17. Disinfectants* (See [annex I](#) for current criteria), which is considered to be difficult to verify. It is suggested to extend the scope to other type of chemicals and to include this requirement under Staff training criterion, since that the cleaning staff generally carries out this type of activities.

Rationale of proposed "Assessment and verification"

- In addition to a declaration of compliance, details of the training programme are suggested for the verification.
- Furthermore, records of the evidence showing that the training update has taken place are requested (e.g. attendance to training list signed by staff).

3.1.3 Criterion 3: - Information to guests

Proposal for criterion 3: - Information to guests

- a) The tourist accommodation shall also provide information to the guests, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. This information shall be actively given to the guests in oral and/or written form at the reception and/or in-room and shall include, in particular, the following aspects:
- i. Environmental policy of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation.
 - ii. Energy saving actions in relation to lights, air conditioning and heating systems when the guests leave the room and/or windows are opened.
 - iii. Water saving actions in relation to leaks checking, and changes of sheets and towels frequency.
 - iv. Waste reduction and separation actions in relation to disposable items, disposal categories and items that shall not be disposed of with the waste water.
 - v. Environmentally preferable means of transport available to guests.
- b) Guests shall be given a questionnaire (via internet or at reception) asking about (1) their views on these general environmental aspects of the tourist accommodation and (2) general customer satisfaction with the facilities and services of the tourist accommodation. A clear procedure which records customer comments, complaints, replies given and corrective actions taken shall be in place.

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

Rationale of Proposed Criterion text

- The criterion is in line with BEMP which is to encourage and facilitate environmentally responsible behaviour and activities, and provides environmental education for guests through on-site activities and courses.
- As a result from last comments received the text has been simplified in order to allow some flexibility to applicants and to not repeat the requirements already mentioned along the criteria set. Instead a text specifying that information to guests shall be done in accordance with the mandatory and applicable optional criteria in this EU Ecolabel is introduced.

- It has been specified that information *shall be actively given to the guests in oral and/or written form at the reception and/or in-room*. This could include oral presentation and/or other methods – e.g. in a welcome folder in guest rooms, via signs in rooms and common areas. The information shall include the main aspects and actions to promote a responsible behaviour from guests and to make them aware of that their help is needed to comply with criteria (e.g. towels reuse information) etc.
- In addition to waste sorting information (available containers/bins at the accommodation), in order to facilitate wastewater treatment, guest shall be informed on waste that shall not be disposed of with the wastewater to prevent the sewage blockage this is in line with current criterion M15. Correct waste water disposal and is related to proposed criterion on waste sorting (see section 3.4.3).
- Several stakeholders suggested including requirements on logo visibility through website and mandatory ECAS registration. It is a common practice for tourist accommodation sites to email guests with details of bookings etc. These methods of communication could be used to include information on the EU Ecolabel logo, licence number and the environmental policy with the aim to promote the EU Ecolabel and to raise awareness on the environmental policy of the accommodation. However, the possibility of including a mandatory criterion on this has been discarded as the regulation does not oblige the applicant to display the logo in the product/service.
- Finally it is proposed to maintain the requirement on guest questionnaire(s) as a minimum on the environmental aspects and on a general satisfaction with the facilities and services of the tourist accommodation. It is proposed that questionnaires are given either at reception or via internet and that a clear procedure which records customer comments, complaints and corrective actions is put in place by the service provider.

Rationale of proposed "Assessment and verification"

- In addition to a declaration of compliance, copies of the information provided to the guests and procedures for distributing, collecting and for taking the feedback into account is requested.

3.1.4 Criterion 4: General maintenance

Proposal for criterion 4: - General maintenance

Preventative maintenance of appliances/devices shall be carried out at least yearly, or more often if required by law or relevant manufacturer's instructions. The maintenance shall include the inspection of possible leakage and assurance of the proper functioning at least for heating, ventilation and air conditioning (HVAC) appliances, water heating appliances, water-related appliances (taps devices, toilets and urinals, sinks, plumbing,

Proposal for criterion 4: - General maintenance

irrigation systems, etc.) and refrigeration systems.

Appliances using refrigerants covered by the Regulation (EU) No 517/2014 of the European Parliament and of the Council of 16 April 2014 on fluorinated greenhouse gases⁽²⁾, shall be inspected and maintained as follow:

- i. for equipment that contains fluorinated greenhouse gases in quantities of 5 tonnes of CO₂ equivalent or more, but of less than 50 tonnes of CO₂ equivalent: at least every 12 months; or where a leakage detection system is installed, at least every 24 months;
- ii. for equipment that contains fluorinated greenhouse gases in quantities of 50 tonnes of CO₂ equivalent or more, but of less than 500 tonnes of CO₂ equivalent: at least every six months or, where a leakage detection system is installed, at least every 12 months;
- iii. for equipment that contains fluorinated greenhouse gases in quantities of 500 tonnes of CO₂ equivalent or more: at least every three months or, where a leakage detection system is installed, at least every six months.

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.

Rationale of Proposed Criterion text

- BEMP and LCA are to “ensure that all equipment is maintained through appropriate periodic inspection”. In addition, the environmental scheme Tripadvisor Greenleaders scheme [Tripadvisor Greenleaders (2013)], has a criterion on preventative maintenance plan which checks, at least quarterly, that building energy and water equipment (e.g. HVAC, lighting, plumbing fixtures, irrigation systems, etc.) are functioning properly.
- Against this background, it is suggested to partially align to Tripadvisor Greenleaders and the scope of the criterion is extended to other type of appliances. However the maintenance is requested to be carried out at least yearly instead of quarterly as requested in Tripadvisor Greenleaders as the check every 3 months must be too much a burden for applicants.
- Finally, the Regulation (EC) No 842/2006 of the European Parliament and of the Council on fluorinated gas has been replaced by updated Regulation No 517/2014.

Rationale of proposed "Assessment and verification"

- In addition to a declaration of compliance, details on the maintenance programme and persons/companies carrying out the maintenance are suggested to be used as a means of proof.

3.1.5 Criterion 5: Consumption monitoring

Proposal for criterion 5: Data collection

² OJ L 150, 20.5.2014, p.195

Proposal for criterion 5: Data collection

- a) The tourist accommodation shall have procedures for collecting and monitoring data monthly or at least yearly, **on the following aspects as a minimum:**
- i. Specific energy use (kWh/guest night and/or kWh/m²·year)
 - ii. Percentage of final energy use met by renewable energy generated on site (%)
 - iii. Water consumption per guest-night (litres/guest-night)
 - iv. Waste generation per guest-night (kg/guest-night)
 - v. Consumption of chemical products for cleaning, dishwashing, laundry, sanitising and other special cleaners (e.g. swimming pool backwashing) (kg and/or litres / guest-night) specifying if they are ready-to-use or undiluted.
 - vi. Percentage of ISO Type I ecolabelled products (%) used from the applicable optional criteria in this EU Ecolabel

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the **collecting and monitoring** 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 collect this data every year. **The tourist accommodation shall report the results together with the audit report and the environmental report mentioned in criterion 1.***

Rationale of Proposed Criterion text

- 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. In addition, BEMP suggest that “appropriate environmental indicators are measured at the process level and associated with best practise techniques”.
- The Nordic Swan environmental label also has a criterion relating to energy and water consumption data and requires measurements for: Water (litres/guest-night) and Energy (Electricity and heating consumption per year and square metre or Electricity and heating consumption per year and guest night).
- With the aim to simplify the criteria set, the proposed criterion merges the two current criteria 28: Energy and water consumption data and 29: Other data collection. (See [annex I](#) for current criteria).
- In addition, with the aim to promote synergies with EMAS it is suggested to harmonize the indicators to those set by the Sectoral Reference Document on Tourism sector.

Rationale of proposed "Assessment and verification"

- For the verification of this criterion, a declaration of compliance and a description of the procedures for collecting the information are requested.
- In addition, with the aim to recognise that on application there might not be information collected by the applicant, it is suggested to provide data for at least the previous six months (if available) and thereafter, in order to link this criterion with the Environmental Management System, the data it is suggested to be provided together with the audit report and the environmental report mentioned in criterion 1.

3.2 Mandatory criteria related to energy

3.2.1 Criterion 6: Energy efficient space heating and water heating appliances

Proposal for criterion 6: Energy efficient water-based space heating and water heating appliances

a) **Water-based** space heating **appliances** installed within the duration of the EU Ecolabel licence shall:

- i. be a high efficiency cogeneration unit as defined by Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012 on energy efficiency ⁽³⁾, or
- ii. have seasonal space heating energy efficiency and/or GHG emission limits in accordance with the values in the tables below calculated as stated in the Commission Decision 2014/314/EU of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters ⁽⁴⁾:

<i>Water-based space heater type</i>	<i>Efficiency indicator</i>
All space heating appliances except solid biomass boiler heaters and heat pump heaters	Minimum Seasonal Space Heating Energy Efficiency (n_s) $\geq 98\%$
Solid biomass boiler heaters	Minimum Seasonal Space Heating Energy Efficiency (n_s) $\geq 79\%$

<i>Water-based space heater type</i>	<i>Efficiency indicator</i>
Heat pump heaters (two options are valid for heat pumps using refrigerants with GWP ≤ 2000 , option 2 is mandatory for heat pumps using refrigerants with GWP > 2000)	Option 1 - Minimum Seasonal Space Energy Heating Efficiency / refrigerant GWP values
	$n_s \geq 107\%$ / [0 – 500]
	$n_s \geq 110\%$ / (500 – 1000]
	$n_s \geq 120\%$ / (1000 – 2000]
	Option 2 - GHG emission limits
	150 g CO ₂ -equivalent/kWh heating output

b) Local space heating appliances installed within the duration of the EU Ecolabel licence shall comply with the minimum seasonal space heating energy efficiency set by the Commission Regulation (EU) 2015/1185 of 24 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for solid fuel local space heaters ⁽⁵⁾, and the Commission Regulation (EU) 2015/1188 of 28 April 2015 implementing Directive

⁽³⁾ OJ L 315, 14.11.2012, p. 1.

⁽⁴⁾ OJ L 164, 3.6.2014, p. 83.

⁽⁵⁾ OJ L 193, 21.7.2015, p.1

Proposal for criterion 6: Energy efficient water-based space heating and water heating appliances

2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for local space heaters ⁽⁶⁾ (gaseous and liquid fuel local space heaters).

- c) Water heating appliances installed within the duration of the EU Ecolabel licence shall have at least the following relevant energy classes as defined in Commission Delegated Regulation (EU) No 812/2013⁽⁷⁾:

<i>Water heater type</i>	<i>Efficiency indicator</i>
All water heaters with a declared load profile ≤ S	Energy Class A
All water heaters except heat pump water heaters, with a declared load profile > S	Energy Class A
Heat pump water heaters with a declared load profile > S	Energy Class A+

- d) Existing cogeneration units shall comply with the definition of high efficiency in Directive 2004/8/EC of the European Parliament and of the Council of 11 February 2004 on the promotion of cogeneration based on a useful heat demand in the internal energy market ⁽⁸⁾.
- e) Existing hot-water boilers fired with liquid or gaseous fuels as defined in the Council Directive 92/42/EEC of 21 May 1992 on efficiency requirements for new hot-water boilers fired with liquid or gaseous fuels ⁽⁹⁾ shall comply with efficiency standards at least equivalent to three stars as stated in the Directive. The efficiency of boilers excluded from Directive 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: For requirements a, b) and c) the license holder shall inform the Competent Body about the new installation within the duration of the EU Ecolabel licence of above mentioned appliances and provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the space and water heaters appliances indicating how the required efficiency is met. EU Ecolabel water-based heaters products will be deemed to comply with requirement a).ii. Other ISO type I label products having the above mentioned requirements will be deemed to comply. Where EU Ecolabel water-based heaters 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 2014/314/EU(4). Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate.

For requirements d) and e) the applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the space and water heaters appliances indicating how the required efficiency is met.

⁽⁶⁾ OJ L 193, 21.7.2015, p. 76

⁽⁷⁾ OJ L 239, 6.9.2013, p.83

⁽⁸⁾ OJ L 52, 21.2.2004, p.50

⁽⁹⁾ OJ L 167, 22.6.92, p.17

Rationale of Proposed Criterion text

- This criterion is proposed to be revised to be fully aligned to the main product policies ruling on heating appliances.
- For space water-based heaters, the energy efficiencies thresholds match the ones within the EU Ecolabel criteria for water-based heaters. In the case of heat pumps, it is proposed to set a criterion on GHG emissions according to the 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.
- In order to simplify the assessment and verification, for both applicants and Competent Bodies, 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 5. Proposed ns thresholds and equivalent TEWI values

GWP	ns (%) for TEWI=150 gCO₂/kWh	Proposed ns thresholds (%)	TEWI for the proposed ns
[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

- This option (option 1 in the criterion text) would stop penalizing higher values of GWP if there is not an upper limit in the ranges of GWP, i.e. for GWP > 2000, the energy efficiency requested keeps constant regardless the GWP value of the specific refrigerant used in the heat pump. Therefore, it is proposed to set the TEWI option (option 2 in the criteria text) mandatory for those heat pumps using refrigerants with GWP > 2000.
- Local space heating appliances have been included, completing the range of heating products currently ruled by Ecodesign regulations. These appliances use direct heat instead a heat transfer fluid, and they are covered by the Commission Regulation (EU) 2015/1185 ⁽⁵⁾ for solid fuel local space heaters, and the Commission Regulation (EU) 2015/1188 ⁽⁶⁾ for gaseous and liquid fuel local space heaters. The requirements within these regulations are scheduled to be in force in January 2022 and in January 2018 respectively. Therefore, the criterion proposal is aimed to underpin the phasing-in of the Ecodesign thresholds.

- 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, due to a larger penetration of heat pumps and solar technologies in this market segment. 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.

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those where the manufacturers and/or installers declare the energy efficiency of the equipment, and what is required by Ecodesign regulations where applicable. The requirements for water-based heaters are harmonized with the EU Ecolabel criteria for this product group, therefore, the heaters awarded EU Ecolabel are deemed to comply. Other ISO type I labels covering the requirements are also recognized as proof of compliance, as requested by the stakeholders.
- According to the stakeholders' suggestion, the assessment and verification section has been reinforced by an information requirement which enables the Competent Body to be aware of the new installation within the duration of the EU Ecolabel licence of above mentioned appliances.

3.2.2 Criterion 7: Energy efficient air conditioning and air-based heat pumps appliances

Proposal for criterion 7: Energy efficient air conditioning and air-based heat pumps appliances	
Household air conditioning and air-based heat pumps appliances installed within the duration of the EU Ecolabel licence shall have at least the following relevant energy classes as defined in Commission Delegated Regulation (EU) No 626/2011 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 ⁽¹⁰⁾ :	
<i>Type</i>	<i>Energy efficiency class (cooling / heating)</i>

⁽¹⁰⁾ OJ L 178, 6.7.2011, p.1

Proposal for criterion 7: Energy efficient air conditioning and air-based heat pumps appliances

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+

Note: This criterion applies to electric mains-operated air conditioners and air-based heat pumps with a rated capacity of ≤ 12 kW for cooling, or heating, if the product has no cooling function. This criterion does not apply to appliances that use non-electric energy sources; and appliances of which the condenser - or evaporator- side, or both, do not use air for heat transfer medium.

Assessment and verification: The license holder shall have to inform the Competent Body about the new installation within the duration of the EU Ecolabel licence of above mentioned appliances and provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system indicating how the required efficiency is met.

Rationale of Proposed Criterion text

- Tipten 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. In order to facilitate compliancy to the criterion, this table is included in the criterion text.

Table 6. 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: Tipten, updated October 2014

- This criterion scope has been extended to the range of products within Commission Delegated Regulation (EU) No 626/2011, i.e. air-based heat pumps, and a clarification about the exclusions aligned to this regulation has been added.

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those required by the Energy Labelling regulation.
- According to the stakeholders' suggestion, the assessment and verification section has been reinforced by an information requirement which enables the Competent Body to be aware of the new installation within the duration of the EU Ecolabel licence of above mentioned appliances.

3.2.3 Criterion 8: Energy efficient lighting

Proposal for criterion 8: Energy efficient lighting

- a) **At the date** of the EU Ecolabel licence award:
- At least 40% of all **lighting** in the tourist accommodation shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012 of 12 July 2012 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of electrical lamps and luminaires ⁽¹¹⁾.
 - At least 50% of **lighting** that is situated where the lamps 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⁽¹¹⁾.
- b) In maximum of 2 years from the date of the EU Ecolabel licence award:
- At least 80% of all **lighting** in the tourist accommodation shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012⁽¹¹⁾.
 - The 100% of **lighting** that is situated where the lamps 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⁽¹¹⁾.

Note: Percentages are set in reference to the total amount of lighting suitable to use energy-saving lighting. The targets above do not apply to light fittings whose physical characteristics do not allow use of energy-saving lighting.

Assessment and verification: The applicant shall provide to the competent body a two written reports indicating the total amount of lamps and luminaires suitable to use energy-saving lighting, operating hours and amount of energy saving lamps and luminaires with at least energy efficient light lamps and luminaires of Class A as defined in Commission Delegated Regulation (EU) No 874/2012⁽¹¹⁾. The reports shall also include the explanation on the impossibility to substitute lamps and luminaires where physical characteristics do not allow use of energy-saving lamps and luminaires. First and second reports shall be provided at the application date and within a maximum of 2 years from the date of the award respectively.

⁽¹¹⁾ OJ L 258, 26.9.2012, p.1

Proposal for criterion 8: Energy efficient lighting

The physical characteristics which may prevent the use of energy efficient light bulbs may include: decorative lighting requiring specialised lamps and luminaires; 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 lamps and luminaires can't be used. This may include, for example, photographic evidence of the type of lighting installed.

Rationale of Proposed Criterion text

- BEMP report reveals that lighting represents a 12% of the total energy consumption of a tourist accommodation. 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."
- A stakeholder feedback suggested only requesting energy efficient lamps and hence letting it to applicant choose which technology to use. They also suggested setting the level to minimum A+ (which defacto is asking for LED lamps).
- At the AHWG2 there were divided views. While several stakeholders do not see a problem in complying with this criterion (they even mentioned they have a well return of the investments made), other stakeholders have problem implementing this criterion especially in big hotels, however they welcomed the phase in period for this criterion. In addition, a Competent Body suggested that it would be better to require 40% of the light bulbs Class A when company does the EU Ecolabel application, instead that 1 year after. On this way, Competent Bodies only should to do an extra verification 2 years from the date of the EU Ecolabel licence award. (See section 5 for stakeholder comments)
- The report on Energy labelling produced by LightingEurope [LightingEurope, 2013], shows indicative example of different types of lamps for each energy class according to the Commission Delegated Regulation (EU) No 874/2012. See the following table:

Figure 4. 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 HID	Average LEDs and modules, average to good compact fluorescents and HID
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

- Against this background, the 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. In addition, with the aim to reduce the burden on verification first requirement shall be in place on application instead of 1 year after the date of award.

Rationale of proposed "Assessment and verification"

- *For the assessment and verification of this criterion. The applicant shall provide to the competent body a two written reports, first one on application and the second one after two years with the following details:*
 - *the total amount of lamps and luminaires*
 - *the operating hours*
 - *the amount of energy saving lamps and luminaires with at least energy efficient light lamps and luminaires of Class A as defined in Commission Delegated Regulation (EU) No 874/2012⁽¹⁾, and*
 - *the explanation on the impossibility to substitute lamps and luminaires where physical characteristics do not allow use of energy-saving lamps and luminaires.*

3.2.4 Criterion 9: Automatic switching off of appliances/devices

Proposal for criterion 9: Automatic switching off of appliances/devices
a) HVAC (heating, ventilation and air conditioning) systems/appliances installed within the duration of the EU Ecolabel licence shall be equipped with an automatic switch off when windows are opened and when guests leave the room.
b) Automatic systems which turn the lighting off when guests leave the room, shall

Proposal for criterion 9: Automatic switching off of appliances/devices

be installed in new or renovated rental accommodations/guest rooms **within the duration of the EU Ecolabel licence**

Assessment and verification: The license holder should have to inform the Competent Body about the new installation within the duration of the EU Ecolabel licence of above mentioned systems/devices and provide technical specifications from the professional technicians responsible for the installation and/or maintenance of these systems/devices.

Rationale of Proposed Criterion text

- BEMP outlines that information should be provided to guests/staff to encourage switching off of air conditioning and lights where appropriate. In addition, automatic switching off of heating and cooling systems and intelligent lighting control are encouraged as a method of saving energy. However, it is recognised that 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)."
- The proposed criterion merges the current criteria. M7. *Switching off heating or air conditioning* and M8. *Switching off lights* (See [annex I](#) for current criteria) into a single criterion on with the aim to simplify the criteria set. The requirements on information to guest/staff have been placed on the appropriate criteria for this purpose and in order to recognise that investment is needed for this type of automatic systems the mandatory requirement only request these systems for new installations.

Rationale of proposed "Assessment and verification"

- Regarding that this criterion applies to new installation within the duration of the EU Ecolabel licence. It is suggested that the applicant inform the CB if installation is carried out and to provide the corresponding technical information of such systems at this stage.

3.2.5 Criterion 10: Outside heating and air conditioning appliances

Proposal for criterion 10: Outside heating and air conditioning appliances

No outside **heating and air conditioning** appliances shall be used by the tourist accommodation.

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

Rationale of Proposed Criterion text

- 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.
- 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. 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: the

use of outside heating would undermine the image of EU Ecolabel, and it would be hard to communicate to those guests who choose an Ecolabelled accommodation over non-labelled alternatives.

- In addition, a written feedback received after AHWG2 suggested extending the scope to outside air conditioning systems. (See section 5 for stakeholder comments)
- Against this background it is proposed that the criterion adopts option 2: total restriction of this type of systems, and to include air conditioning within the scope of this criterion.

Rationale of proposed "Assessment and verification"

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

3.2.6 Criterion 11: Procurement of electricity from a renewable electricity supplier

Proposal for criterion 11: Procurement of electricity from a renewable electricity supplier

The tourist accommodation shall contract **at least 50%** of its electricity from renewable energy sources, as defined in 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 ⁽¹²⁾. **For this purpose:**

- a) The tourist accommodation shall contract an individual electricity tariff containing at least 50% of the electricity from renewable energy sources. This requirement is fulfilled either in case the overall fuel mix marketed by the supplier is disclosed as being at least 50% renewable or in case the product fuel mix of the purchased tariff is disclosed as being at least 50% renewable.

Or

- b) Alternatively the minimum 50% renewable energy can also be acquired through the unbundled purchase of Guarantees of Origin which are traded in line with the Principles and Rules of Operation of the European Energy Certificate System (EECS). For this alternative, the following condition shall be met:

- The national regulations of both the exporting and the importing country provide domain protocols that are accredited by the Association of Issuing Bodies (AIB) under the Principles and Rules of Operation of the EECS in order to avoid double counting in case the customer opts for an unbundled purchase of GOs.

Note: This criterion does not apply if **there are not suppliers offering the electricity tariff described above or guarantees of origin where the accommodation is located.**

Assessment and verification: The applicant shall supply a declaration from (or the contract(s) with) the electricity/guarantees of origin supplier(s) indicating the nature of the renewable energy source(s) and the percentage of electricity supplied that is from a renewable source. In addition, for applicants complying with option b) declarations from the guarantees of origin supplier showing compliance with above condition mentioned in b) shall be provided.

⁽¹²⁾ OJ L 140, 5.6.2009, p.16

Proposal for criterion 11: Procurement of electricity from a renewable electricity supplier

According to Directive 2009/28/EC ⁽¹²⁾, 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.

Rationale of Proposed Criterion text

- With regard to the electricity generated from renewable energy sources. 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 (Eurostat, 2012).
 - In the electricity grid all power is mixed as there is no possibility to separate electricity produced from different sources. This means that accommodations located close to a nuclear power plant are very likely to be powered by that nuclear power. However, in the liberalised electricity market consumers can choose who puts electricity on the grid. This fact, together with an increasingly concerned market about the environment and climate change is leading to a growing demand for renewable electricity and a growing number of suppliers are giving consumers the possibility to choose green energy contracts.
 - In order to make possible to choose specific types of electricity, accountancy systems have been established. States and regulators have databases to track which electricity has been put on the grid, and to attribute that electricity to specific electricity sellers or electricity consumers. According to the EU guideline 2009/28/EC, all European Union member states are required to establish a national registry for Guarantees of Origin (GOs) for electricity from renewable energy sources. Among others, 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>)
- The system registers what has been put on the grid. For each MWh produced, the producer gets a 'certificate' which then is cancelled on behalf of a specific consumer'
 - The EECS (European Energy Certificate System) is a standardization system for the European Guarantees of Origin (GOs) based on structures and procedures which ensure the reliable operation of international certificate schemes. States that are members of the AIB (Association of Issuing Bodies) and adhere to the EECS system are easily able to trade GOs cross-border with no risk of double counting, claiming or attributing. At the present, 20 European states are members of the AIB. (For more information see: http://www.aib-net.org/portal/page/portal/AIB_HOME)

There exist two routes for consumers to buy green power:

1. In most cases, consumers do not have to do anything. If you [buy your renewable electricity via a regular electricity seller](#), it is up to them to make sure that they have the required amount of tracking certificates to cover your green consumption.

This means that they need to cancel Guarantees of Origin to cover all of their green electricity sales (tariff). And the electricity market regulator checks to make sure that this happens.

Consumers in at least 15 Member States can already opt for renewable electricity tariffs covered by renewable Guarantees of Origin (RES-GOs) at a competitive price. (ACER (2014)).

However, several stakeholders mentioned that the level of investment associated to switching to green companies at their countries may impose an economic burden that can reach 50% more than current investment on GOs.

In addition, many of the suppliers that appeared recently on the market does not offer tariffs to suitable to accommodations as they are only available for domestic use.

2. It is possible for consumers to take care of the tracking themselves. This means that the electricity consumer buys the required tracking instruments separately to the electricity contract. This may be a good option for companies which cannot choose their electricity contract themselves, for example for companies which get electricity as part of their rent agreement.

This [separate purchase of tracking certificates is known as an “unbundled purchase”](#). In this case, the electricity consumer has 2 separate contracts. One with a regular electricity seller who offers the national electricity supply and a second contract with a seller of Guarantees of origin for renewable electricity.

However, this alternative is not possible everywhere. While German Guarantee of Origin - database can only be used by electricity sellers, the unbundled purchase is very popular amongst LEED (Leadership in Energy & Environmental Design) certifiers and EU Ecolabel for Tourist Accommodation licence holders in France. (See <http://www.green-access.com/>)

Furthermore, although buying GOs appears to be a cheaper option in the countries where this practice is available, the increase from 50% to 100% may impose an extra economic burden that might be too much for applicants that are already investing money to comply with the whole criteria set. (See section 5 for stakeholder comments)

- In relation to best practices, BEMP stated that the annual generating capacity of off-site renewable installations directly supported by the accommodation's investment may be considered equivalent to on-site renewable generation. However, attributing additionality (*“consumption of European green electricity leads to the increase of green electricity generation compared to what otherwise would have occurred”* as defined by www.windmade.org) to purchased renewable electricity is complex. BEMP authors expressed that the requirement for traceability and exclusive accounting of renewable electricity consumption provides a useful indication of additionality and that another potential indicator is that purchased renewable electricity should originate from new capacity, installed within the past e.g. two years.
- Benchmarks of excellence in BEMP are:
 - The equivalent of 50 % of the accommodation's annual energy use is generated by on-site renewable sources, or by verifiably additional off-site renewable energy sources.

- 100 % of electricity is from traceable renewable electricity sources not already accounted for by another organisation or in the national electricity average generating mix, or that are less than two years old
- In other hands, using electricity ecolabels is a way to prove additionality and to go one step further. Third party verified and independent Ecolabels include special or additional criteria for electricity production and can also fund projects such as the building of new renewable energy installations. They show that you are buying more than just green power. Widely used standards, such as Greenhouse Gas Protocol and LEED (Leadership in Energy & Environmental Design), encourage consumers to buy labelled electricity. In addition, there is a wide variety ecolabels in Europe (TR2.0)
- Against this background it is suggested to have a mandatory requirement on procurement of 50% RES electricity in order to recognise that some countries might have difficulties to offer competitive prices of green tariffs (if available) and/or to allow the unbundle purchase. The proposal attempts to recognise the situation as it currently exists in Europe but is considered to be a first step and is in line with first benchmark of excellence in BEMP.
- Wording has been modified in accordance to input provided by experts on electricity market with the aim to clarify that either overall fuel mix or product fuel mix are accepted for the % of RES requested. In addition, in order to avoid the double counting of GOs risk associated to unbundle purchase, the condition on AIB accreditation of the GOs supplier has been introduced for applicants going for the alternative option.
- In order to go a step further the optional criteria awards those applicants purchasing the 100% labelled electricity. More points are allocated in this criterion recognising the potential environmental benefit. In addition, current proposal will probably lead, where tariffs and/or unbundle purchase are available, to the compliance of optional criteria as more points could be awarded and most of the suppliers provide a 100% green tariff where they operate. (See section 3.7.11)

Rationale of proposed "Assessment and verification"

- It is suggested that declaration/contracts from the electricity/guarantees of origin supplier(s) shall be used as a means of proof for this criterion.

3.2.7 Criterion 12: Coal and heavy oils

Proposal for criterion 12: Coal and heavy oils

No heavy oils having sulphur content higher than 0.1% and no coal shall be used as an energy source.

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

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

Rationale of Proposed Criterion text

- It is 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.

- Additionally, BEMP stated that Gas- and oil-fired boilers do not represent best practice with respect to heating and cooling sources'. Although this criterion may not be relevant in major part of Europe, this criteria set is applicable also outside EU thus it is considered to be relevant.
- 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 it is.

Rationale of proposed "Assessment and verification"

- It is suggested an on-site visit for a suitable assessment and verification of this criterion.

3.3 Mandatory criteria related to water

3.3.1 Criterion 13: Efficient water fittings: Bathroom taps and showers

Proposal for criterion 13: Efficient water fittings: Bathroom taps and showers

Without prejudice of the local or national regulation on water flow rate from bathroom taps and showers, the average water flow rate of the bathroom taps and showers shall not exceed 8 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). EU Ecolabel sanitary tapware products and/or other ISO type I label products having the above mentioned requirements will be deemed to comply. 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 of 21 May 2013 establishing the ecological criteria for the award of the EU Ecolabel for sanitary tapware⁽¹³⁾. Where other type I label products are used, applicant shall provide a copy of the ISO type I label certificate.

Rationale of Proposed Criterion text

- BEMP identifies water use in tourist accommodation 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).

⁽¹³⁾ OJ L 145, 31.5.2013, p.6

- BEMP for water flow is “to minimise water consumption through the installation of low-flow taps and showers” and proposes as a benchmark of excellence: Shower flow rate ≤ 7 L/min and bathroom tap flow rate ≤ 6 L/min.
- Stakeholder comments received during the revision process expressed some concerns about the customers' experience and problems with pipes if the limit rate is lowered too much (See section 5 for stakeholder comments). A licence holder mentioned that 8 litres/minute threshold could be reachable.
- 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 (9l/min) recognising that there is a room for improvement as indicated by benchmarks but recognising the mandatory character of the criterion.. In addition, it has been added a sentence *Without prejudice of the local or national regulation on water flow rate from bathroom taps and showers*, with the aim to recognise that in certain areas there might be legislation concerning this to avoid sewage malfunctioning.

Rationale of proposed "Assessment and verification"

- For the verification and assessment of this criterion, in addition to a declaration of compliance relevant documentation to show compliance is requested.
- Where EU Ecolabel sanitary tapware products are used, the applicant shall provide a copy of the EU Ecolabel certificate.
- Where other type I label products are used (complying with the requirements), applicant shall provide a copy of the ISO type I label certificate.

3.3.2 Criterion 14: Efficient water fittings: toilets and urinals

Proposal for criterion 14: Efficient water fittings: toilets and urinals

Without prejudice of the local or national regulation on toilets and urinals flushing:

- At least 70% of the toilets at the accommodation (rounded to the next integer) shall have a full flush ≤ 7 litres*
- Continuous flushing is not permitted in any urinal at the accommodation.*

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion together with appropriate supporting documentation. EU Ecolabel flushing toilets and urinals products and/or another ISO type I label toilets and urinals having the above mentioned requirements will be deemed to comply. Where EU Ecolabel 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 of 7 November 2013 establishing the

Proposal for criterion 14: Efficient water fittings: toilets and urinals

ecological criteria for the award of the EU Ecolabel for flushing toilets and urinals ⁽¹⁴⁾. *Where other ISO type I label are used, applicant shall provide a copy of the type I label certificate.*

Rationale of Proposed Criterion text

- BEMP identifies water use in tourist accommodation 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) and 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 considering that toilets are more frequently used than urinals, it was suggested for the second proposal of the revised criterion to merge this criterion with current *criterion 54 WCs flushing* (See [annex I](#) for current criteria) which limit the flush of toilets to 6L.
- Best practice for toilet flushing is to “minimise water consumption through the installation low- and dual-flush WCs” and the benchmark of excellence is average effective toilet flush ≤ 4.5 L and installation of waterless urinals.
- Stakeholders mentioned at the AHWG2 that the threshold for toilets is very strict for the mandatory criterion. (See section 5 for stakeholder comments)
- Against this background the requirement on avoidance of continuous flushing of urinals is kept. In addition, it is proposed that the limit for toilets is relaxed to 7L and only that applies to 70% of toilets to allow a progressive modification of flushes. In addition, it has been added a sentence *Without prejudice of the local or national regulation on water flow rate from bathroom taps and showers*, with the aim to recognise that in certain areas there might be legislation concerning this to avoid sewage malfunctioning.

Rationale of proposed "Assessment and verification"

- For the verification and assessment of this criterion, in addition to a declaration of compliance relevant documentation to show compliance is requested.
- Where EU Ecolabel toilets and urinals products are used, the applicant shall provide a copy of the EU Ecolabel certificate.
- Where other type I label products are used (complying with the requirements), applicant shall provide a copy of the ISO type I label certificate.

3.3.3 Criterion 15: Reduction in laundry achieved through reuse of towels and bedclothes

Proposal for criterion 15: Reduction in laundry achieved through reuse of towels and bedclothes

⁽¹⁴⁾ OJ L 299, 9.11.2013, p.38

Proposal for criterion 15: Reduction in laundry achieved through reuse of towels and bedclothes

The tourist accommodation shall change sheets and towels by default at the frequency established by its environmental action programme that should be inferior to every day unless requested by law and/or national regulations or established by a third party certification scheme the accommodation service is participating in. More frequent changes shall be only carried out if explicitly requested by guests.

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

Rationale of Proposed Criterion text

- BEMP report highlights that efficient housekeeping operations, such as implementation of a bedclothes and towel re-use scheme can reduce water usage. A high turnaround of towels and sheets within a tourist accommodation site gives rise to a significant environmental impact.
- It is proposed to keep the current criterion with the aim to encourage guests to re-use towels and bin liners. The text related to guest/staff information the requirement has been added in mandatory criteria for staff training and information to guests and the text has been modified to specified that frequency for change sheets and towels shall be in accordance to its environmental action programme, specifying that the frequency should be lower to everyday unless requested by law and/or national regulations or established by a third party certification or 'specifically' requested.
- The title of the criterion has been modified to better reflect the aim of the criterion.

Rationale of proposed "Assessment and verification"

- For the assessment and verification of this criterion, a declaration of compliance together with relevant documentation on the frequency established shall be provided.

3.4 Mandatory criteria related to waste and wastewater

3.4.1 Criterion 16: Waste prevention: Food service waste reduction plan

Proposal for criterion 16: Waste prevention: Food service waste reduction plan

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

- a) **With the aim to reduce package waste:** No single dose packages for non-perishable food stuffs (e.g. Tea, coffee, sugar, chocolate powder...) shall be used for food services.
- b) **With the aim to balance package/food waste depending on the season:** For all perishable food stuffs (e.g. Yogurt, jams, honey, cold meats, pastries...), the tourist accommodation shall manage the provision of food to guests to minimise both

Proposal for criterion 16: Waste prevention: Food service waste reduction plan

food and packaging waste. To achieve this, the tourist accommodation shall follow a documented procedure [linked to the action program \(criterion 1\)](#) which specifies how the food waste/packaging waste balance is optimised based [on the number of guests](#).

[Exempt from this criterion are shops and vending machines under management of the tourist accommodation.](#)

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. [This will be moreover checked during the on-site visit.](#)

Perishable food is defined as being subject to decay or destruction, usually food that has been, for example minimally processed or not otherwise preserved and which relies on refrigerated storage in order to reduce the rate of decay and loss of quality (Codex Alimentarius). [Note: Tea bags are not considered to be packaging. Only plastic or paper envelopes containing the tea bags are considered to be packaging.](#)

Rationale of Proposed Criterion text

- BEMP is to 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.
- LCA revealed that concerning waste generation organic solid waste represents 79.9% of the total.
- Considering that the avoidance of packaging could lead to waste of food it was suggested during the revision of current *criterion 21. Breakfast packaging* (See [annex I](#) for current criteria) that the criterion is reformulated with the aim to manage the waste derived from food services (packaging and food). 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 Competent Body expressed concern related to the possibility that what is written on the procedure is not what the applicant is really doing in practice.
- It is proposed to keep the proposed criterion. However a further specification on the text has been introduced to better reflect the aim of each requirement. In order to reduce the complexity concerning assessment and verification, indicative examples of non-perishable or long life food products and perishable foods have been introduced.

Rationale of proposed "Assessment and verification"

- In addition to a declaration of compliance, the applicant shall provide information on the documented procedure followed to minimise the package/food waste.

- Furthermore, checking during on site visit has been highlighted for this criterion to increase the level of assurance for the verification of this requirement.

3.4.2 Criterion 17: Waste prevention: Disposable items

Proposal for criterion 17: Waste prevention: Disposable items

- Disposable **toiletries items** (shower caps, brushes, nail files, shampoos, soaps etc.) shall not be available to guests in rooms, unless requested by guests, there is a legal obligation or it is a requirement of independent quality rating/certification scheme the tourism accommodation is a member of.
- Disposable food service items (crockery, cutlery, and water jugs) shall not be available to guests in rooms and restaurant/bar service, **unless the applicant has an agreement with a recycler for such items.**
- Disposable towels and bedding items shall not be available to guests in rooms, **unless the applicant has an agreement with a recycler for such items.**

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation explaining how the criterion is fulfilled. Any legislation or independent quality rating/certification scheme requiring the use of **disposable items** shall also be provided. **This will be moreover checked during the on-site visit.***

Rationale of Proposed Criterion text

- BEMP guidance highlights the importance of waste prevention, and suggests 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.”
- The Tripadvisor Greenleaders environmental scheme for tourist accommodation [Tripadvisor Greenleaders (2013)], 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.
- A stakeholder mentioned that tourist accommodation might use single-use bedding items for quality and practical reasons. However they mentioned that for such type of item they have agreements with recycling services. (See section 5 for stakeholder comments)

- It is proposed that the criterion is partially aligned to the Tripadvisor Greenleaders scheme. 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.
- 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).

Rationale of proposed "Assessment and verification"

- 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.
- In addition to documentary evidence, checking during on site visit has been highlighted for this criterion to increase the level of assurance for the verification of this requirement.

3.4.3 Criterion 18: Waste sorting and sending for recycling

Proposal for criterion 18: Waste sorting and sending for recycling

- Without prejudice of the local or national regulation on waste separation, adequate containers for waste separation by guest shall be available in the rooms and/or on each floor and/or central point of the tourist accommodation.
- Waste shall be separated by the tourist accommodation into the categories required and/or suggested by the available local waste management facilities, with particular care regarding hazardous waste e.g. toiletries, toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances.

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

Rationale of Proposed Criterion text

- LCA concerning waste generation revealed that 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.
- 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”.
- With the aim to simplify the criteria set, EU Ecolabel criteria addressing waste separation: M12. Waste bins in toilets, M18. Waste separation by guests, M19. Waste separation and O74. Fat/oil disposal (See [annex I](#) for current criteria) have been merged as all of them are tackling the same topic. The criteria are in line with BEMP and LCA suggestions.
- 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.
- In response to stakeholder comments, it is proposed that the location of waste containers is clarified by replacing “within easy reach” with “in the rooms and/or on each floor and/or central point of the tourist accommodation” This change would allow the criterion to apply to all tourist accommodation services, including campsites. (See section 5 for stakeholder comments)
- It has been included the clause: "Without prejudice of the local or national regulation". This was considered relevant as there might be countries where this is regulated

Rationale of proposed "Assessment and verification"

- For the assessment and verification of this criterion, declaration of compliance, an indication of the different categories of waste accepted by the local authorities and/or relevant contracts with recycling services is requested.
- In addition to documentary evidence, checking during on site visit has been highlighted for this criterion to increase the level of assurance for the verification of this requirement.

3.5 Mandatory criteria related to other criteria

3.5.1 Criterion 19: No smoking in common areas

Proposal for criterion 19: 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 and documentary evidence such as pictures of the signs hung inside the tourist accommodation.

Rationale of Proposed Criterion text

- Although 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). Stakeholders overwhelmingly agreed that the criterion be tightened to ensure best practice is maintained by all applicants covering those who are not already legally obliged to provide no smoking areas.
- Current criterion 22. No smoking areas (See [annex I](#) for current criteria), requests a mandatory no smoking section. The revised criterion extends the restriction to any indoor common area.

Rationale of proposed "Assessment and verification"

- The assessment and verification section of this criterion has been further clarified and documentary evidence such as pictures of the signs hung inside the tourist accommodation are suggested as a means of proof.

3.5.2 Criterion 20: Promotion of environmentally preferable means of transport

Proposal for criterion 20: Promotion of 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:

- a) **Details on environmentally preferable means of transport locally available to sightsee the city/village where the tourist accommodation is located:** public transportation, bicycles, etc.
- b) **Details on environmentally preferable means of transport locally available to arrive/leave the city/village where the tourist accommodation is located.**
- c) **The information shall include, if available, special offers and/or agreements with transport agencies that tourist accommodation may offer to guest and staff. (e.g. pick up service, staff collective bus, electric cars...)**

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.

Rationale of Proposed Criterion text

- 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.
- Current *M23. Public transportation* (See [annex I](#) for current criteria) promotes preferable means of transport. However, several stakeholders agreed that the criterion should request information is provided on the different means of home to home transportation.

- In addition, several stakeholders at the AHWG2 expressed that the requirement should request applicants to provide detailed and practical information. (See section 5 for stakeholder comments)
- Against this background the criterion text has been further specified in order to cover several preferable means of transportation, including public transportation. Additionally, it is proposed to request the provision of detailed information on preferable means of transport from home to home which has been pointed out as an environmental hotspot by the LCA review and possible agreements or offers available to guests and staff (e.g. pick up service, staff collective bus, electric cars...).

Rationale of proposed "Assessment and verification"

- In addition to a declaration of compliance, the applicant shall provide information on the information material available e.g. on websites, brochures, etc.

3.5.3 Criterion 21: Information appearing on the EU Ecolabel

Proposal for criterion 21: Information appearing on the EU Ecolabel

Box 2 of the EU Ecolabel shall contain the following text:

— This tourist accommodation is actively taking **measures to reduce its environmental impact** using renewable energy sources, saving energy and water, reducing waste and improving the local environment.

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion **explaining on which support they intend to display the logo.***

Rationale of Proposed Criterion text

- This is a horizontal criterion to all product groups and regarding that environmental hotspot for tourist accommodation did not change since last revision it is proposed to retain as it is in the current criteria in force. However minor amendments have been made in the text and verification section to further clarify the requirement.

3.6 Optional criteria related to general management

3.6.1 Criterion 22: EMAS registration, ISO certification of the tourist accommodation (up to 5 points)

Proposal for criterion 22: EMAS registration, ISO certification of the tourist accommodation (up to 5 points)

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

Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification.

Rationale of Proposed Criterion text

- 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. BEMP encourages the formulation of an environmental management plan – as is encouraged through this existing criterion.
- In order to recognise the potential environmental benefit derived from EMAS registration the point allocation has been increased for this option.

Rationale of proposed "Assessment and verification"

- ISO 14001 certificate and/or EMAS registration should be provided as a means of proof.
- These types of management systems might be expensive. For this reason the criterion remains as optional. This is especially important in the case of SMEs as their limited resources can be an obstacle to getting an ISO14001 certification or EMAS registration.

3.6.2 Criterion 23: EMAS registration or ISO certification of suppliers (up to 5 points)

Proposal for criterion 23: EMAS registration or ISO certification of suppliers (up to 5 points)

At least two of the main suppliers or service providers of the tourist accommodation shall be registered with EMAS (5 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.

Rationale of Proposed Criterion text

- This content of this criterion does not require major updating based on the following:
 1. EMAS registration and ISO 14001 certification are still in force and so no update is required.
 2. BEMP encourages the formulation of an environmental management plan – as is encouraged through this existing criterion.
- 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.
- It is proposed that the criterion is revised to require two of the suppliers to be registered/certified, to increase the level of ambition while keeping the criterion feasible for SMEs. 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 hotspot highlighted by BEMP..

Rationale of proposed "Assessment and verification"

- ISO 14001 certificate and/or EMAS registration should be provided as a means of proof.

- These types of management systems might be expensive. For this reason the criterion remains as optional. This is especially important in the case of SMEs as their limited resources could be an obstacle to get an ISO14001 certification or EMAS registration.

3.6.3 Criterion 24: Ecolabelled services (up to 4 points)

Proposal for criterion 24: Ecolabelled services (up to 4 points)

All outsourced laundry and/or cleaning is carried out by a provider who has been awarded an ISO Type I ecolabel (2 points for each service, to a maximum of 4 points)

Assessment and verification: The applicant shall provide appropriate evidence of ISO Type I certification by laundry and/or cleaning suppliers.

Rationale of Proposed Criterion text

- BEMP benchmark of excellence proposes all outsourced laundry to be carried out by a provider who has been awarded an ISO Type I ecolabel (e.g. Nordic Swan), and all in-house large-scale laundry operations.
- Current criterion 095. *Subcontractors comply with mandatory criteria* (See [annex I](#) for current criteria), was found to be vague and it has been reformulated to request that outsourced laundry and/or cleaning is carried out by a provider who has been awarded an ISO Type I ecolabel as a result of stakeholders comments and recognising the environmental potential associated to ecolabelled services.

Rationale of proposed "Assessment and verification"

- ISO Type I certificates are suggested to be used as a mean of proof.

3.6.4 Criterion 25: Environmental and social communication and education (up to 3 points)

Proposal for criterion 25: Environmental and social communication and education (up to 3 points)

a) The tourist accommodation shall provide environmental communication and education notices on local biodiversity, landscape and nature conservation measures to guests (1 point)

and/or

b) The tourist accommodation shall provide [information to guests](#) on [local touristic points of interest](#), local guides, local restaurants, markets, craft centres to guests (1 point)

and/or

c) Guest entertainment includes elements of environmental education ([e.g. books, animations, events](#)) (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.

Rationale of Proposed Criterion text

- 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)”.
- 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.
- Minor amendments are proposed in the title in order to reflect the inclusion of the social requirements in the criterion.

Rationale of proposed "Assessment and verification"

- Appropriate supporting documentation is requested for its verification (e.g. brochures...)

3.6.5 Criterion 26: Consumption monitoring: Energy and water sub-metering (up to 2 points)

Proposal for criterion 26: Consumption monitoring: Energy and water sub-metering (up to 2 points)

The tourist accommodation shall have energy and water meters installed so as to allow data collection on consumption of different activities and/or machines, such as the following categories (1 point for each category, to a maximum of 2 points):

- a) Rooms
- b) Pitches
- c) Laundry service
- d) Kitchen service
- e) Specific machines (e.g. refrigerators, washing machines)

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with an analysis of the data collected (if already available).

Rationale of Proposed Criterion text

- 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 it 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. This option criterion awards points for further investment in monitoring activities.

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2. BEMP encourages sub-metering and benchmarking all major energy/water-consuming processes and this is reflected in the current EU Ecolabel criterion and so no update is required.

Rationale of proposed "Assessment and verification"

- The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion and the collected data (if already available) for the verification of this criterion.

3.7 Optional criteria related to energy

3.7.1 Criterion 27: Energy efficient space heating and water heating appliances (up to 3 points)

Proposal for criterion 27: Energy efficient space heating and water heating appliances (up to 3 points)

The tourist accommodation shall have **at least**:

- a) A water-based space heating appliance/system meeting criterion 6 (a) (1 point)

And/or

- b) A local space heating appliance having at least the energy class A as defined in Commission Delegated Regulation (EU) 2015/1186 of 24 of April 2015 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of local space heaters ⁽¹⁵⁾ (1 point)

And/or

- c) A water heating appliance/system meeting criterion 6 (c) (1 point)

Assessment and verification: The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the space and water heaters appliances indicating how the required efficiency in 1 a), and/or 1 b) and/or 1c) is met. EU Ecolabel water-based heaters products will be deemed to comply with requirement 1 a).ii. Other ISO type I label products having the requirements mentioned in 1 a), and/or 1 b) and/or 1c) will be deemed to comply. Where EU Ecolabel water-based heaters 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 2014/314/EU(4). Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate.

Rationale of Proposed Criterion text

- BEMP is to install the most efficient HVAC systems. This is in line with the current EU Ecolabel criterion.
- This criterion has been brought into line with the EU Ecolabel, Ecodesing and Energy labelling, but other existing ecolabels including equivalent requirements are recognized as valid for verification (see Assessment and verification section).

⁽¹⁵⁾ OJ L 193, 21.7.2015, p. 20

- It is proposed this criterion to be aligned to the EU Ecolabel for water based space heaters, awarding points for the existing appliances that comply with the mandatory criterion. This approach is also proposed for water heating appliances.
- For local space heating appliances, it is proposed to award points to those appliances meeting the Energy Class A as defined in Commission Delegated Regulation (EU) 2015/1186 (15). This ensures that the appliances selected are amidst the best performance ones, i.e. those showing energy efficiency above 93% for fossil fuel boilers or above 65% for biomass boilers (estimations based on correction factors equal 5%).
- The title of the criterion has been modified to include space heaters (both water-based and local).

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those where the manufacturers and/or installers declare the energy efficiency of the equipment, and what is required by Ecodesign regulations where applicable. The requirements for water-based heaters are harmonized with the EU Ecolabel criteria for this product group, therefore, the heaters awarded EU Ecolabel are deemed to comply. Other ISO type I labels covering the requirements are also recognized as proof of compliance, as requested by the stakeholders.

3.7.2 Criterion 28: Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)

Proposal for criterion 28: Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)

The tourist accommodation shall have at least:

- a) 50% of household air conditioners or air-based heat pumps in the tourist accommodation (rounded to the next integer) have energy efficiency 15% higher than the threshold set in criterion 7 (1.5 point)

And/or

- b) 50% of household air conditioners or air-based heat pumps in the tourist accommodation (rounded to the next integer) have energy efficiency 30% higher than the threshold set in criterion 7 (2 points)

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 indicating how the required efficiency is met.

Rationale of Proposed Criterion text

- 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. Therefore, an update in line with the Regulation 2011/626/EU is required, while awarding additional efforts beyond the mandatory requirement.

- 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.

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those required by the Energy Labelling regulation.

3.7.3 Criterion 29: Air-based heat pumps up to 100 kW heat output (3 points)

Proposal for criterion 29: Air-based heat pumps up to 100 kW heat output (3 points)

The tourist accommodation shall have at least an [air-based heat pump meeting criterion 7 \(if applicable, see note in criterion 7\)](#) and awarded with the EU Ecolabel in accordance with [Commission Decision 2007/742/EU of 9 November 2007](#) establishing the ecological criteria for the award of the Community eco-label to electrically driven, gas driven or gas absorption heat pumps ⁽¹⁶⁾ or other ISO Type I label.

Assessment and verification: The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system indicating [how the required efficiency is met \(if applicable\)](#). Where EU Ecolabel heat pump products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the [Commission Decision 2007/742/EC](#) ⁽¹⁶⁾. Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate.

Rationale of Proposed Criterion text

- The policy tools affecting heat pumps, (EU Ecolabel on heat pumps, EU Ecolabel on water-based heaters and Ecodesign and Energy Labelling on air conditioners) address different technologies and sizes, as it is shown in Table 7:

Table 7: Product policies covering heat pumps

Product policy	Scope	Criterion within TAS criteria set
EU Ecolabel water-based heaters (Commission Decision 2014/314/EU)	Air/brine/water/ground to water heat pumps up to 400 kW heat output	Criterion 6 and 28
Ecodesign and energy labelling room air conditioning appliances (Commission Delegated Regulation (EU) No 626/2011)	Air to air heat pumps up to 12 kW cooling capacity, electrically driven	Criterion 7 and 29

⁽¹⁶⁾ OJ L 301, 20.11.2007, p.14

EU Ecolabel air-based heat pumps (Commission Decision 2007/742/EU)	Air/brine/water/ground to air heat pumps up to 100 kW heat output, both electrically and fuel driven, and absorption/adsorption	Criterion 30
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Table 7 summarizes the product policies, their scopes, and the respective criterion that reflects their requirements within the TAS criteria set. As it can be observed, there is a range of technologies for which there are not Ecodesign/Energy labelling regulations yet:

- brine/water/ground to air heat pumps
- air to air heat pumps above 12 kW
- air to air heat pumps up to 12 kW not electrically driven
- However, these appliances are within the scope of the EU Ecolabel of air-based heat pumps (Commission Decision 2007/742/EU), up to 100 kW, which includes criteria on energy efficiency, refrigerants, noise, etc. It is therefore appropriate to formulate a criterion that covers these technologies while promotes this EU Ecolabel product group. Nevertheless it is also necessary to harmonize the energy efficiency criterion to the current Energy labelling on air conditioners (Commission Delegated Regulation (EU) No 626/2011), whose scope overlaps EU Ecolabel's in the air to air heat pumps up to 12 kW electrically driven. This would avoid the use of outdated energy classes and any loophole within the energy efficiency criteria set of the TAS product group.

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those where the manufacturers and/or installers declare the energy efficiency of the equipment, and what is required by Ecodesign regulations where applicable. Other ISO type I labels covering the requirements are also recognized as valid as proof of compliance, as suggested by the stakeholders. The EU Ecolabel or other ISO type I label certificate is requested for the assessment and verification.

3.7.4 Criterion 30: Energy efficient household appliances (up to 4 points)

Proposal for criterion 30: Energy efficient household appliances (up to 4 points)

Tourist accommodation shall have energy efficient household appliances for the following categories: (0.5 point or 1 point each of the following categories, to a maximum of 4 points)

- At least 50% (0.5 point) or 90% (1 point) of household refrigerating appliances (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as defined in 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 ⁽¹⁷⁾.
- At least 50% (0.5 point) or 90% (1 point) of household electric ovens (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as defined in Commission Delegated Regulation (EU) No 65/2014 of 1 October 2013

⁽¹⁷⁾ OJ L 314, 30.11.2010, p.17

Proposal for criterion 30: Energy efficient household appliances (up to 4 points)

supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of domestic ovens and range hoods ⁽¹⁸⁾.

- c) At least 50% (0.5 point) or 90% (1 point) of household dishwashers (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as defined in 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 ⁽¹⁹⁾.
- d) At least 50% (0.5 point) or 90% (1 point) of household washing machines (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as laid down in Commission Delegated Regulation (EU) No 1061/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household washing machines ⁽²⁰⁾.
- e) At least 50% (0.5 point) or 90% (1 point) of office equipment (rounded to the next integer) (PCs, monitors, faxes, printers, scanners, photocopying machines) shall be ENERGY STAR qualified as defined in Regulation (EC) No 106/2008 of the European Parliament and of the Council of 15 January 2008 on a Community energy-efficiency labelling programme for office equipment ⁽²¹⁾.
- f) At least 50% (0.5 point) or 90% (1 point) of household electric tumble driers (rounded to the next integer) shall be offer Energy Label rated Class A++ or better as defined in Commission Delegated Regulation (EU) No 392/2012 of 1 March 2012 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household tumble driers ⁽²²⁾.
- g) At least 50% (0.5 point) or 90% (1 point) of household vacuum cleaners (rounded to the next integer) shall be offer Energy Label rated Class A++ or better as defined in Commission Delegated Regulation (EU) No 665/2013 of 3 May 2013 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of vacuum cleaners ⁽²³⁾.

Note: The criterion does not apply to household appliances not covered by the regulation mentioned for each category (e.g. industrial appliances).

Assessment and verification: The applicant shall provide documentation indicating the energy class (Energy Star certificate for category e)) of all appliances for the applicable category.

Rationale of Proposed Criterion text

- Several stakeholders at AHWG1 raised concern about the cost of replacing all existing equipment and the high level of stringency if A+++ is required as proposed in the first revised proposal. 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

⁽¹⁸⁾ OJ L 29, 31.1.2014, p.1

⁽¹⁹⁾ OJ L 341, 30.11.2010, p.1

⁽²⁰⁾ OJ L 314, 30.11.2010, p.47

⁽²¹⁾ OJ L 39, 13.2.2008, p.1

⁽²²⁾ OJ L 123, 9.5.2012, p.1

⁽²³⁾ OJ L 192, 13.7.2013, p.1

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 thus requirements for new acquisitions do not fit for optional criteria.

- 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.
- It is proposed that the criterion 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 50% or 90% of household appliances must comply instead of all household appliances. This partially aligns the criterion to Greenleaders to avoid producing unnecessary waste and allows scoring points recognising the different degrees of improvement. In addition, a requirement on vacuum cleaners has been added.
- 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 hotspot highlighted by BEMP.

Rationale of proposed "Assessment and verification"

- Documentation indicating the energy class (Energy Star certificate for category e) is requested for the verification of this criterion.

3.7.5 Criterion 31: Heat recovery (up to 3 points)

Proposal for criterion 31: Heat recovery (up to 3 points)

The tourist accommodation shall have a heat recovery system for one (1.5 point) or two (3 points) of the following categories: refrigeration systems, ventilators, washing machines, dishwashers, swimming pool(s), and sanitary waste water.

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

Rationale of Proposed Criterion text

- BEMP is to encourage the installation of heat recovery systems where possible. Stakeholder feedback on the current allocation of points 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”.
- 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 hotspot identified in BEMP.

Rationale of proposed "Assessment and verification"

- The assessment and verification text has been further specified giving examples of the documentation that could be provided for the verification of this criterion (e.g. copy of the project of the heat recovery systems in place, description from a technician, etc.).

3.7.6 Criterion 32: Thermoregulation (up to 3 points)

Proposal for criterion 32: 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 (1 point):

- Common area temperature set point, while in cooling mode, is set at or above 22°C for the duration of the summer.
- Common area temperature set point, while in heating mode, is set at or below 22°C for the duration of the winter.

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 (2 points):

- Room temperature set point, while in cooling mode, is set at or above 22°C for the duration of the summer.
- Room temperature set point, while in heating mode, is set at or below 22°C for the duration of the winter.

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

Rationale of Proposed Criterion text

- BEMP is to encourage the installation of zoned temperature control.
- 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 5: 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

- The proposal made for the AHWG2 was partially aligned to Tripadvisor Greenleaders requirements on indoor/guestrooms' thermoregulation and to EN15251 recommended values. However stakeholder's feedback pointed out that the EN15251 recommended values are very stringent and might not meet the comfort temperature expectations of guests. (See section 5 for stakeholder comments).
- In order to ensure energy efficiency, it is proposed that this criterion is maintained and the temperature values be aligned to Tripadvisor Greenleaders requirements on indoor/guestrooms' thermoregulation. Additionally, the awarded points are proposed to be reallocated recognising the different actions that can be taken in order to save energy.

Rationale of proposed "Assessment and verification"

- For the assessment and verification of this criterion a declaration of compliance with this criterion, together with documentation on the thermoregulatory systems or procedures followed to set the designated temperature ranges are requested to applicants.

3.7.7 Criterion 33: Automatic switch off appliances/devices (up to 4.5)

Proposal for criterion 33: Automatic switch off appliances/devices (up to 4.5)

- 90% of the **guest** rooms in the tourist accommodation (**rounded to the next integer**) shall be equipped with an automatic switch off when windows are opened and when guests leave the room (1.5 points)
- 90% of the **guest** rooms in the tourist accommodation (**rounded to the next integer**) shall be equipped with an automatic system which turns the lights off when guests leave the room (1.5 points)
- 90% of the outside lighting (**rounded to the next integer**) not needed for security reasons shall be turned off automatically after a defined time, or be activated through a proximity sensor (1.5 points)

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

Rationale of Proposed Criterion text

- BEMP outlines that automatic switching off of heating and cooling systems intelligent lighting control is encouraged as a method of saving energy. However, it is recognised that for small enterprises where automatic lighting control in rooms may not be practical.
- The proposed criterion merges the current criteria. 042. Automatic switching-off of air conditioning and heating systems (1.5 points), 047. Automatic switching off lights in tourist accommodation (1.5 points), 050. Automatic switching off outside lights (1.5 points) (See [annex I](#) for current criteria) into a single criterion with the aim to simplify the criteria set. Regarding the optional character of this criterion it is considered to be suitable to request for these types of devices that might be expensive however to allow certain flexibility it is requested for the 90% of guest rooms.

Rationale of proposed "Assessment and verification"

- Technical specifications from the professional technicians responsible for the installation and/or maintenance of these systems/devices are requested for the verification of this criterion.

3.7.8 Criterion 34: District heating/cooling and cooling from cogeneration (up to 4 points)

Proposal for criterion 34: District heating/cooling and cooling from cogeneration (up to 4 points)	
a)	The heating and/or cooling of the tourist accommodation shall be provided by efficient district heating or cooling system . For the purposes of the EU Ecolabel this is defined as follows: a district heating or cooling system using at least 50 % renewable energy, 50 % waste heat, 75 % cogenerated heat or 50 % of a combination of such energy and heat , as defined by Directive 2012/27/EU(3) (2 points)
And/or	
b)	Cooling of the tourist accommodation shall be provided by a high efficiency cogeneration unit according to Directive 2012/27/EU(3) (2 points).
<i>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 cooling system by means of cogeneration.</i>	

Rationale of Proposed Criterion text

- 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).

- The formulation of this criterion is proposed to distinguish between district heating and on-site cogeneration. The first part (a) addresses district heating, and it has been worded according to the definition of 'efficient district heating' within the Directive 2012/27/EU. This definition ensures that the heating/cooling is produced by means of renewable energy, waste heat or cogeneration. The consumption of heating/cooling from a district network is relatively akin to electricity consumption, however, there is a relevant difference regarding the GO schemes for each of them. While the GO systems for electricity are well defined and almost fully deployed across EU, the schemes supporting GO of heating/cooling are not very common since they are voluntary, as provided in the Directive 2009/28/EC [RE-DISS (2012)]. Nevertheless, this should not hamper the promotion of efficient district heating/cooling systems within the TAS criteria set, and therefore it is proposed to keep this criterion.
- The second part of the criterion (b) refers just to cooling from high efficiency cogeneration units. This is to avoid overlapping with criterion 6, which already regards cogeneration units for space and water heating. The voluntary criterion is therefore designed to award those installations that go a step further and provide cooling, for example, by means of an absorption/adsorption chiller. This enables the cogeneration unit to stretch its capacity to meet the energy demands of the TAS, bolstering the flexibility as an added value of this technology [(IEA (2014))]

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those where the manufacturers and/or installers declare the technical specifications of the equipment, for cogeneration, and those where the organization in charge of the district heating network describes the technical specifications of the system according to Directive 2012/27/EU

3.7.9 Criterion 35: Electric hand driers with proximity sensor (0.5 point)

Proposal for criterion 35: Electric hand driers with proximity sensor (0.5 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. Where ISO type I label products are used, applicant shall provide a copy of the type I label certificate.

Rationale of Proposed Criterion text

- 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.
- It is suggested that hair dryers are removed from this criterion, as they do not typically operate via proximity sensor.

Rationale of proposed "Assessment and verification"

- Appropriate documentation or type I label certificates could be used for the verification of this criterion.

3.7.10 Criterion 36: Space Heater NOx emissions (1.5 points)

Proposal for criterion 36: Space Heater NOx emissions (1.5 points)	
<p>For all space heaters in the tourist accommodation the nitrogen oxide (NOx) content of the exhaust gas shall not exceed the limit values indicated in the table below, <i>calculated as stated in</i></p> <ul style="list-style-type: none"> i. 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, for gaseous and liquid fuel space water-based heaters ii. Commission Regulation (EU) 2015/1189 of 28 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for solid fuel boilers, for solid fuel space water-based heaters iii. Commission Regulation (EU) 2015/1188(6) for gaseous and liquid fuel local space heaters. iv. Commission Regulation (EU) 2015/1185(5) for solid fuel local space heaters, 	
Heat generator technology	NOx emission limit
Gas heaters	<p>For water-based heaters equipped with internal combustion engine: 240_mg/kWh GCV energy input</p> <p>For water-based and local heaters equipped with external combustion (boilers): 56 mg/kWh GCV energy input</p>
Liquid fuel heaters	<p>For water-based heaters equipped with internal combustion engine: 420 mg/kWh GCV energy input</p> <p>For water-based and local heaters equipped with external combustion (boilers): 120 mg/kWh GCV energy input</p>
Solid fuel heaters	<p>Space water-based heaters: 200 mg/Nm³ at 10% O₂</p> <p>Local space heaters: 200 mg/Nm³ at 13% O₂</p>
<p><i>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 space heaters appliances indicating how the required efficiency is met. EU Ecolabel water-based heaters products will be deemed to comply. Other ISO type I label products having the above mentioned requirements will be deemed to comply. Where EU Ecolabel water-based heaters 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 2014/314/EU(3).Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate.</i></p>	

Rationale of Proposed Criterion text

- 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 8

Table 8. 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 130 mg/kWh for local.	36 mg/kWh GCV energy input	40 mg/kWh	N/A	N/A	<u>Condensing:</u> 60 mg/kWh <u>Non-condensing:</u> 70 mg/kWh
Liquid fuel boiler	120 mg/kWh for water-based 130 mg/kWh for local.	100 mg/kWh GCV energy input	N/A	N/A	N/A	120 mg/kWh
Solid fuel boiler (biomass)	200 mg/Nm ³ at 10% O ₂ for water-based 200 mg/Nm ³ at 13% O ₂ for local (275 mg/Nm ³ at 10% O ₂)	150 mg/Nm ³ at 10 % O ₂	<u>Pellets:</u> 150 mg/Nm ³ <u>Chips:</u> 190 mg/Nm ³	340 mg/m ³	<u>Automatic:</u> 100 mg/MJ (pellets); 120 mg/MJ (chips); <u>Manual:</u> 120 mg/MJ	340 mg/Nm ³
Fuel-driven heat pump	<u>Gas fuel:</u> 70 mg/kWh (external); 240 mg/kWh (internal) <u>Liquid fuel:</u> 120 mg/kWh (external); 420 mg/kWh (internal)	<u>Gas fuel:</u> 36 mg/kWh (external); 170 mg/kWh (internal) <u>Liquid fuel:</u> 100 mg/kWh (external); 380 mg/kWh (internal)	<u>External:</u> 40 mg/kWh <u>Internal:</u> 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	<u>Gas fuel:</u> 70 mg/kWh (external); 240 mg/kWh (internal) <u>Liquid fuel:</u> 120 mg/kWh (external); 420 mg/kWh (internal)	Gas fuel: 170 mg/kWh GCV energy input Liquid fuel 380 mg/kWh GCV energy input	<u>Gas fuel:</u> 250 mg/Nm ³ <u>Liquid fuel:</u> 2500 mg/Nm ³	N/A	N/A	No limit

¹⁾ Implementing Measure for Ecodesign Regulations (• Commission Regulation (EU) No 813/2013, Commission Regulation (EU) 2015/1189, Commission Regulation (EU) 2015/1188, Commission Regulation (EU) 2015/1185

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. Commission Regulation (EU) 2015/1188(5) for gaseous and liquid fuel local space heaters also establishes a limit for NOx emissions, but a little less strict (130 mg/kWh).

- Commission Regulation (EU) 2015/1189 of 28 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for solid fuel boilers sets a threshold of 200 mg/Nm³ at 10% O₂, for biomass boilers, to be in force by 2020. This limit value is expressed as seasonal space heating emissions, i.e. an average between full and part load conditions.
- Commission Regulation (EU) 2015/1185(4) for solid fuel local space heaters settles a more lenient threshold (200 mg/Nm³ at 13% O₂ = 275 mg/Nm³ at 10% O₂), to be mandatory by 2022.
- The requirements set by these regulations do not apply to existing heaters, and therefore, the limit values on NOx emissions would entail an additional effort while alignment to mandatory requirements across Europe is secured.

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those where the manufacturers and/or installers declare the energy efficiency of the equipment, and what is required by Ecodesign regulations. As it can be observed in Table 8, EU Ecolabel water-based heaters shall meet stricter NOx limit values, so they are deemed to comply. Other ISO type I labels covering the requirement are also recognized as valid as proof of compliance.

3.7.11 Criterion 37: Procurement of electricity from a renewable electricity supplier (up to 4 points)

Proposal for criterion 37: Procurement of electricity from a renewable electricity supplier (4 points)

- a) The tourist accommodation shall contract an individual electricity tariff containing at 100% of the electricity from renewable energy sources as defined in Directive 2009/28/EC ⁽¹²⁾ and third party certified by an environmental electricity label.
- b) Alternatively the 100% renewable energy, third party certified by an environmental electricity label, can also be acquired by the separate purchase of Guarantees of Origin, as defined in the Directive 2009/28/EC ⁽¹²⁾

Assessment and verification: The applicant shall supply a declaration from (or the contract 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 or indicating that 100% of electricity purchased is certified or has been awarded a third party certified environmental label.

Rationale of Proposed Criterion text

- Against this background it is suggested to have a mandatory requirement on procurement of 50% RES electricity in order to recognise that some countries might have difficulties to offer competitive prices of green tariffs (if available) and/or allow direct unbundle purchase. The proposal attempts to recognise the situation as it currently exists in Europe but is considered to be a first step.
- In order to go a step further the optional criteria awards those applicants purchasing the 100% labelled electricity. More points are allocated in this criterion recognising the potential environmental benefit. In addition, current proposal will probably lead, where tariffs and/or unbundle purchase are available, to the compliance of optional criteria as more points could be awarded and most of the suppliers provide a 100% green tariff where they operate. (See section 3.2.6)

Rationale of proposed "Assessment and verification"

- It is suggested that declaration/contracts from the electricity/guarantees of origin supplier(s) shall be used as a means of proof for this criterion.

3.7.12 Criterion 38: On site self-generation of electricity through renewable energy sources (up to 5 points)

Proposal for criterion 38: On site self-generation of electricity through renewable energy sources (up to 5 points)

The tourist accommodation shall have on site electricity generation from renewable energy sources as defined in Directive 2009/28/EC⁽¹²⁾, which may include: photovoltaic (solar panel) or local hydroelectric system, geothermal, biomass or wind power electricity generation, that generates:

- At least 10% of the overall electricity consumption per year (1 point).

Or

- At least 20% of the overall electricity consumption per year (3 points).

Or

- At least 50% of the overall electricity consumption per year (5 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.

Rationale of Proposed Criterion text

- BEMP is to "install on-site geothermal, solar or wind energy generation where appropriate". The benchmark is: "the equivalent of 50 % of the accommodation's annual energy use is generated by on-site renewable sources".

- For the first proposal this criterion has been clarified to be better distinguished from current Criterion 1: Electricity from renewable energy sources. This criterion (unlike Criterion 1) refers specifically to on-site generation carried out by the tourist accommodation.
- In addition, it was suggested that the section referring to 'Net amount to grid' should be removed as this is not defined in the BEMP and removes the focus from use of renewable energy by the tourist accommodation.
- The criterion was 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.
- Several stakeholders at the First Ad Hoc Working Group were in favour of making on site self-generation of electricity through renewable energy sources a mandatory criterion. However, the proposal 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.
- Against the background 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.
- In addition, it is suggested to align to the benchmark suggested in BEMP and award extra points to those applicants reaching best level of environmental performance.

Rationale of proposed "Assessment and verification"

- 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.

3.7.13 Criterion 39: Heating energy from renewable energy sources (up to 2 points)

Proposal for criterion 39: Heating energy from renewable energy sources (up to 2 points)

- a) 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 [as defined in Directive](#)

Proposal for criterion 39: Heating energy from renewable energy sources (up to 2 points)

2009/28/EC⁽¹²⁾ (1.5 points)

Or

- b) 100% of the total energy used to heat or cool either the rooms or to heat sanitary water shall come from renewable energy sources [as defined in Directive 2009/28/EC^{\(12\)}](#) (2 points)

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.

Rationale of Proposed Criterion text

- BEMP is to encourage the use of renewable energy through either “on-site geothermal, solar or wind energy generation where appropriate”
- This is in line with the current EU Ecolabel criterion and no major changes have been introduced for the proposal.

3.7.14 Criterion 40: Swimming pool heating (up to 1.5 points)

Proposal for criterion 40: Swimming pool heating (up to 1.5 points)

- a) At least 50% of the total energy used to heat swimming pool water shall come from renewable energy sources [as defined in Directive 2009/28/EC^{\(12\)}](#) (1 point)

Or

- b) At least 95% of the total energy used to heat swimming pool water shall come from renewable energy sources [as defined in Directive 2009/28/EC^{\(12\)}](#) (1.5 point)

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on the energy consumed in heating swimming pool water and documentation showing the amount of energy used that comes from renewable energy sources.

Rationale of Proposed Criterion text

- BEMP is to encourage the use of renewable energy.
- A stakeholder suggested lowering the 100% threshold to 95%. 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.
- It is proposed to lower the threshold at 95% according to stakeholder request. This is not substantial change and may cover possible feasibility problems.

Rationale of proposed "Assessment and verification"

- Data on the energy consumed in heating swimming pool water and documentation showing the amount of energy used that comes from renewable energy sources are requested for its verification.

3.8 Optional criteria related to water

3.8.1 Criterion 41: Efficient water fittings: Bathroom taps and showers (up to 4 points)

Proposal for criterion 41: Efficient water fittings: Bathroom taps and showers (up to 4 points)

- a) The average water flow rate of the bathroom taps and showers shall not exceed 6 litres/minute. (2 points)

And/or

- b) At least 50% of the bathroom taps and shower (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Commission Decision 2013/250/EU ⁽¹³⁾ or another ISO type I label. (2 points)

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, and relevant documentation, including an explanation on how the tourist accommodation fulfils the criterion (e.g. use of flowmeter or small bucket and a watch). EU Ecolabel sanitary tapware products and/or other ISO type I label products having the above mentioned requirements will be deemed to comply. 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 ⁽¹³⁾. Where other type I label products are used, applicant shall provide a copy of the ISO type I label certificate.

Rationale of Proposed Criterion text

- BEMP identifies water use in tourist accommodation 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).
- BEMP for water flow is “to minimise water consumption through the installation of low-flow taps and showers” and proposes as a benchmark of excellence: Shower flow rate ≤ 7 L/min and bathroom tap flow rate ≤ 6 L/min.
- Initially it was proposed to set the threshold at 5 litres/minute; however several stakeholders suggested that could compromise customer experience and be difficult to achieve over many floors of a tourist accommodation or at a campsite.
- Against this background, it is suggested to compromise by adjusting the limit to 6 litres/minute, which is the limit requested in for EU Ecolabel sanitary tapware and is aligned to benchmark of excellence of BEMP. Additionally, a requirement on labelled taps and shower heads has been proposed.

Rationale of proposed "Assessment and verification"

- The assessment and verification text has been further specified and the use of the EU Ecolabel/other ISO Type I certification is suggested to be used as a means of verification

3.8.2 Criterion 42: Efficient water fittings: Toilets and urinals (up to 4.5 points)

Proposal for criterion 42: Efficient water fittings: Toilets and urinals (up to 4.5 points)

- a) At least 50% of urinals (rounded to the next integer) shall use a waterless system. (1.5 point)

And/or

- b) At least 50% of urinals (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Commission Decision 2013/641/EU ⁽¹⁴⁾ or another ISO type I label. (1.5 point)

And/or

- c) At least 50% of toilets (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Commission Decision 2013/641/EU ⁽¹⁴⁾ or another ISO type I label. (1.5 point)

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation. EU Ecolabel flushing toilets and urinals products and/or other ISO type I label having the above mentioned requirements will be deemed to comply. 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 ⁽¹⁴⁾. Where other ISO type I labels are used, applicant shall provide a copy of the type I label certificate.

Rationale of Proposed Criterion text

- BEMP identifies water use in tourist accommodation 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) and advises the avoidance of continuous flushing of urinals.
- 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”. Best practice for toilet flushing is to “minimise water consumption through the installation low- and dual-flush WCs” and the benchmark of excellence is average effective toilet flush ≤ 4.5 L and installation of waterless urinals.
- Current *criterion 54 WCs flushing* which limit the flush of toilets to 6L has been proposed to be included in mandatory criteria, however the limit has been adapted in order to recognise the mandatory character of the requirement. (See section 3.3.2)
- For optional criterion it is suggested to include a stricter requirement requesting labelled toilets and urinals however with the aim to recognise the lack of availability of these products on the market other ISO type I labels are accepted and as a minimum 50% of toilets/urinals is requested.
- The title has been reworded to reflect the change.

Rationale of proposed "Assessment and verification"

- The assessment and verification text has been further specified and the use of the EU Ecolabel/ISO type I certification is suggested to be used as a means of verification.

3.8.3 Criterion 43: Dishwasher water consumption (2.5 points)

Proposal for criterion 43: Dishwasher water consumption (2.5 points)

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

Product sub-group	Water consumption (Wt) [litres/cycle]
Household dishwashers with 15 place settings	10
Household dishwashers with 14 place settings	10
Household dishwashers with 13 place settings	10
Household dishwashers with 12 place settings	9
Household dishwashers with 9 place settings	9
Household dishwashers with 6 place settings	7
Household dishwashers with 4 place settings	9.5

Note: The criterion only applies to household dishwashers covered by the Commission Regulation (EU) No 1016/2010 of 10 November 2010 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for household dishwashers ⁽²⁴⁾.

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

Rationale of Proposed Criterion text

- BEMP promotes the selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption
- At the time Commission Regulation (EU) No 1016/2010 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 9. 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

⁽²⁴⁾ OJ L 293, 11.11.2010, p.31

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

- 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 EU) No 1016/2010.
- The revised proposal, it is proposed to align the water consumption thresholds to the benchmarks identified at the Ecodesign benchmark.
- 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 and it applies to all household dishwashers in the accommodation that is considered to lead to a high potential savings.

Rationale of proposed "Assessment and verification"

- In the case technical specifications provided by the applicant refers to annual consumption, 280 total number of standard cleaning cycles per year (identified in Commission Regulation (EU) No 1016/2010 with regard to ecodesign requirements for household dishwashers) shall be assumed to calculate the allowed limits.

3.8.4 Criterion 44: Washing machine water consumption (3 points)

Proposal for criterion 44: Washing machine water consumption (3 points)	
a) 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, measured according to EN 60456, using the standard washing cycle (60 °C cotton program):	
Product sub-group	Water consumption: [litres/cycle]
Household washing machines with a rated capacity of 3 kg	39
Household washing machines with a rated capacity of 3,5 kg	39
Household washing machines with a rated capacity of 4,5 kg	40
Household washing machines with a rated capacity of 5 kg	39
Household washing machines with a rated capacity of 6 kg	37

Proposal for criterion 44: Washing machine water consumption (3 points)

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

Note: The criterion only applies to household washing machines covered by the 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⁽²⁵⁾.

Or

- b) Commercial washing machines used within the tourist accommodation by guests and staff or those used by the tourist accommodation laundry service provider, have an average laundry water consumption ≤ 7 L per kg of laundry washed.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the washing machines. With the aim of showing compliance with criterion a) 220 total number of standard cleaning cycles per year shall be assumed in the case that only annual consumption is provided.

Rationale of Proposed Criterion text

- BEMP promotes the selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption and an average laundry water consumption ≤ 7 L per kg of laundry washed for commercial washing machines.
- At the time Commission Regulation (EU) No 1015/2010 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 10 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

⁽²⁵⁾ OJ L 293, 11.11.2010, p.21

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

- 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 with regard to ecodesign requirements was implemented.
- In addition a requirement aligned to BEMP benchmarks on commercial washing machines has been introduced.
- 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 it applies to all washing machines in the accommodation that is considered to lead to a high potential savings.

Rationale of proposed "Assessment and verification"

- In the case technical specifications provided by the applicant refers to annual consumption, 220 total number of standard cleaning cycles per year (identified in Commission Regulation (EU) No 1015/2010 with regard to ecodesign requirements) shall be assumed to calculate the allowed limits.

3.8.5 Criterion 45: Indications on water hardness (up to 1.5 points)

Proposal for criterion 45: Indications on water hardness (up to 1.5 points)

- a) In proximity to sanitary areas/washing machines/dishwashers there shall be displayed explanations about local water hardness to allow better use of detergents by guests and staff (0.5 point)

Or

- b) An automatic dosage system which optimises detergent use according to water hardness shall be used for washing machines/dishwashers used within the tourist accommodation by guests and staff (1.5 point)

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation showing how the guest is informed or relevant information on the automatic dosage systems used.

Rationale of Proposed Criterion text

- 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.”
- The proposal is that the criterion is amended to clarify the wording and that the points allocated for providing information about local water hardness is lowered in order to recognise the lower level of investment compare to automatic dosage systems.

Rationale of proposed "Assessment and verification"

- For the assessment and verification of this criterion, the applicant shall provide a declaration of compliance and relevant documentation showing how the guest is informed and/or relevant information on the automatic dosage systems used.

3.8.6 Criterion 46: Optimised pool management (up to 3 points)

Proposal for criterion 46: Optimised pool management (up to 3 points)

- a) Heated swimming pools shall be covered at night, and non-heated; filled swimming pools shall be covered when these are not used for more than a day to reduce evaporation (1 point).

and/or

- b) Swimming pools shall have an automatic system which optimises chlorine consumption through optimised dosing or use supplementary disinfection methods such as ozonation and UV treatment (0.5 point) or shall be of the natural type that incorporates natural plant-based filtration systems to achieve water purification to the required hygiene standard (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 (e.g. photographs showing covers, automatic dosage systems or type of pool, documented procedure to use the automatic dosage systems).

Rationale of Proposed Criterion text

- BEMP for the operating of swimming pools does suggest:
 - The correct use of pool covers to reduce heat loss.
 - Minimisation of chlorine consumption through optimised dosing and use of supplementary disinfection methods such as ozonation and UV treatment.
 - In addition, natural pool installation is suggested: The on-site swimming pool(s) incorporate(s) natural plant-based filtration systems to achieve water purification to the required hygiene standard.

This is in accordance with the current EU Ecolabel criterion however the criterion has been modified to better reflect the benchmarks of excellence suggested in BEMP. The title has been amended to better reflect the aim of the criterion.

Rationale of proposed "Assessment and verification"

- In addition to applicant's declaration, the provision of supporting documentation such is photographs showing covers, automatic dosage systems or type of pool is suggested as a means of proof.

3.8.7 Criterion 47: Rainwater and grey water recycling (up to 3 points)

Proposal for criterion 47: Use of alternative water sources (up to 3 points)

The accommodation shall use the following alternative water sources for non-sanitary and non-drinking purposes in the accommodation facility:

Proposal for criterion 47: Use of alternative water sources (up to 3 points)

- a) Reclaimed water or grey water from laundry and/or showers and/or lavatory sinks (1 point), and/or,
- b) rainwater via rooftop (1 point), and/or
- c) 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.

Rationale of Proposed Criterion text

- 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.”
- A stakeholder requested that more information is provided on what constitutes recycled water as this may vary outside the EU.
- 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.*
- 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

Rationale of proposed "Assessment and verification"

- 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.

3.8.8 Criterion 48: Efficient irrigation (up to 1.5 points)

Proposal for criterion 48: Efficient irrigation (up to 1.5 points)

- a) The tourist accommodation shall have a documented procedure for watering outside areas/plants, including details on how watering times have been optimised and water consumption minimised. This may, for example, include no watering of outside areas. (1 point),

Or

- b) The tourist accommodation shall use an automatic system which optimises watering times and water consumption for outside areas/plants. (1.5 points)

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation including details of the documented system/procedure for watering or photographs showing the automatic watering systems.

Rationale of Proposed Criterion text

- 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.
- 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. However, another stakeholder mentioned that trained staff could be even more efficient than automatic systems.
- 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.

Rationale of proposed "Assessment and verification"

- For the assessment and verification of this criterion, documents showing details of the documented system/procedure for watering or photographs of the automatic watering systems are suggested as a means of proof.

3.8.9 Criterion 49: Indigenous species used in outdoor planting (1 point)

Proposal for criterion 49: Indigenous species used in outdoor planting (1 point)

All existing planting in outdoor areas with trees and hedges shall be composed of indigenous and/or adapted species of vegetation. For the purpose of this EU Ecolabel adapted species of vegetation means:

- i. Those species of vegetation that do not need more water than indigenous species

Proposal for criterion 49: Indigenous species used in outdoor planting (1 point)

- ii. Those species of vegetation that do not need any additional fertilizer than indigenous species
- iii. Those species of vegetation that are not invasive and do not take place from indigenous species.

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.

Rationale of Proposed Criterion text

- BEMP for tourist accommodation include “Planting of green areas with indigenous species to minimise irrigation requirements”. However initially it was proposed to be removed on the basis of its low potential environmental benefit compare to other criteria.
- At the 2nd AHWG meeting most stakeholders strongly disagreed on the deletion of this criterion. They argued the crucial relevance of this criterion in relation to biodiversity and it was also highlighted that this criterion also aimed at irrigation saving in those regions under risk of drought.
- Most comments pointed out that a suitable definition of 'indigenous' was needed to implement the criterion. In addition, several stakeholders mentioned the importance of including adapted species on the scope of this criterion. One expert from the *Centre permanent d'initiative pour l'environnement* (see more info: <http://www.cpie.fr/spip.php?rubrique43>) provided details on the definition of adapted species.
- The text has been clarified in order to specify that the criterion applies to all existing planting.

Rationale of proposed "Assessment and verification"

- The assessment and verification is based on the supporting documentation from the expert to confirm the plants to be native or adapted species of the area where the TAS is located.

3.9 Optional criteria related to waste and wastewater

3.9.1 Criterion 50: Paper products (up to 2 points)

Proposal for criterion 50: Paper products (up to 2 points)

90% of the following categories of paper products used shall have been awarded the EU Ecolabel or other ISO Type I eco-labels (0.5 point each of the following categories, to a maximum of 2 points):

- a) Toilet paper
- b) Tissue paper
- c) Office paper

Proposal for criterion 50: Paper products (up to 2 points)

- d) Printed paper
- e) Converted paper (e.g. envelopes)

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2014/256/EU of 2 May 2014 establishing the ecological criteria for the award of the EU Ecolabel for converted paper products ⁽²⁶⁾ and/or Commission Decision 2012/481/EU of 16 August 2012 establishing the ecological criteria for the award of the EU Ecolabel for printed paper ⁽²⁷⁾ and/or Commission Decision 2011/332/EU of 7 June 2011 on establishing the ecological criteria for the award of the EU Ecolabel for copying and graphic paper⁽²⁸⁾ and/or Commission Decision 2009/568/EC of 9 July 2009 establishing the ecological criteria for the award of the Community Eco-label for tissue paper⁽²⁹⁾. Where other ISO type I labels are used, applicant shall provide a copy of the type I label certificate.

Rationale of Proposed Criterion text

- BEMP encourages 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.
- 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. Converted paper products are included, so envelopes are also within the scope of this criterion as suggested by stakeholder comments.
- For the same reason, it is proposed to reduce the awarded points according to the environmental benefit compared to other criteria, and the large availability of these products at competitive prices.

Rationale of proposed "Assessment and verification"

- As suggested by the stakeholders, other ISO Type I labels are also valid for the compliance of this criterion.

3.9.2 Criterion 51: Durable goods (up to 3 points)

Proposal for criterion 51: Durable goods (up to 3 points)

At least 40% (rounded to the next integer) of at least one of the following categories of durable goods (1 point for each category, to a maximum of 3 points):

- a) Bed-linen, towels and table clothes
- b) Computers

⁽²⁶⁾ OJ L 135, 8.5.2014, p.24

⁽²⁷⁾ OJ L 223, 21.8.2012, p.55

⁽²⁸⁾ OJ L 149, 8.6.2011, p.12

⁽²⁹⁾ OJ L 197, 29.7.2009, p.87

Proposal for criterion 51: Durable goods (up to 3 points)

- c) Televisions
- d) Bed mattresses
- e) Furniture
- f) Vacuum cleaners
- g) Floor coverings
- h) **Imaging equipment**

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

Assessment and verification: The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2014/350/EU of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products ⁽³⁰⁾ and/or Commission Decision 2009/300/EC of 12 March 2009 establishing the revised ecological criteria for the award of the Community Eco-label to televisions ⁽³¹⁾ and/or Commission Decision 2014/391/EU of 23 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for bed mattresses ⁽³²⁾ and/or Commission Decision 2009/894/EC of 30 November 2009 on establishing the ecological criteria for the award of the Community eco-label for wooden furniture ⁽³³⁾ and/or Commission Decision 2010/18/EC of 26 November 2009 on establishing the ecological criteria for the award of the Community Ecolabel for wooden floor coverings⁽³⁴⁾ and/or Commission Decision 2009/607/EC of 9 July 2009 establishing the ecological criteria for the award of the Community eco-label to hard coverings ⁽³⁵⁾. Where other ISO type I label are used, applicant shall provide a copy of the type I label certificate.

Rationale of Proposed Criterion text

- 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.
- 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.
- With the aim to increase the environmental benefit in the revised version while keeping this criterion doable, a compromise has been taken and 40% is proposed for this optional criterion. Some comments pointed out that the proposal of 50% might be unaffordable.

Rationale of proposed "Assessment and verification"

- As suggested by the stakeholders, other ISO Type I labels are also valid for the compliance of this criterion.

⁽³⁰⁾ OJ L 174, 13.6.2014, p.45

⁽³¹⁾ OJ L 82, 28.3.2009, p.3

⁽³²⁾ OJ L 184, 25.6.2014, p.18

⁽³³⁾ OJ L 320, 5.12.2009, p.23

⁽³⁴⁾ OJ L 8, 13.1.2010, p.32

⁽³⁵⁾ OJ L 208, 12.8.2009, p.21

3.9.3 Criterion 52: Beverages provision (2 points)

Proposal for criterion 52: Beverages provision (2 points)

If beverages are offered (e.g. bar/restaurant service, shops and vending machines) under the ownership or the direct management of the tourist accommodation **only returnable/refillable containers 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 if relevant.

Rationale of Proposed Criterion text

- BEMP 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.
- At the second proposal (TR2.0) it was proposed to merge under a single criterion the optional criterion that addresses disposable drink containers (O73: 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'.
- This criterion is awarding sites using returnable/refillable containers for beverage provision instead of disposable or recyclable plastic/cans (including vending machines). The wording has been amended to avoid the word disposable as suggested by stakeholders and a clarification about the scope of the criterion, which would apply to those beverages or services of the applicant's ownership or directly managed by the applicant.

Rationale of proposed "Assessment and verification"

- It is requested a description of how this criterion is fulfilled.

3.9.4 Criterion 53: Detergents and toiletries procurement (up to 2 points)

Proposal for criterion 53: Detergents and toiletries procurement (up to 2 points)

At least 80% purchased volume or weight of **at least one of** the following detergent and toiletry categories (0.5 points each category, to a maximum of 2 points):

- a) hand dishwashing detergents
- b) detergents for dishwashers
- c) laundry detergent

Proposal for criterion 53: Detergents and toiletries procurement (up to 2 points)

- d) all purpose cleaners
- e) sanitary detergents
- f) soaps and shampoos
- g) hair conditioner

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

Assessment and verification: The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2011/382/EU on establishing the ecological criteria for the award of the EU Ecolabel to hand dishwashing detergents ⁽³⁶⁾ and/or Commission Decision 2011/263/EU of 28 April 2011 on establishing the ecological criteria for the award of the EU Ecolabel to detergents for dishwashers ⁽³⁷⁾ and/or Commission Decision 2011/264/EU of 28 April 2011 on establishing the ecological criteria for the award of the EU Ecolabel for laundry detergents ⁽³⁸⁾ and/or Commission Decision 2011/383/EU of 28 June 2011 on establishing the ecological criteria for the award of the EU Ecolabel to all-purpose cleaners and sanitary cleaners ⁽³⁹⁾ and/or Commission Decision 2014/893/EU of 9 December 2014 establishing the ecological criteria for the award of the EU Ecolabel for rinse-off cosmetic products⁽⁴⁰⁾. Where other ISO type I label are used, the applicant shall provide a copy of the type I label certificate.

Rationale of Proposed Criterion text

- 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.
- 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.
- Against this background, it is proposed to retain the first proposed revised criterion. However the wording has been clarified using bullet points for each category as suggested by stakeholder feedback.

Rationale of proposed "Assessment and verification"

- As suggested by the stakeholders, other ISO Type I labels are also valid for the compliance of this criterion.

⁽³⁶⁾ OJ L 169, 29.6.2011, p.40

⁽³⁷⁾ OJ L 111, 30.4.2011, p.22

⁽³⁸⁾ OJ L 111, 30.4.2011, p.34

⁽³⁹⁾ OJ L 169, 29.6.2011, p.52

⁽⁴⁰⁾ OJ L 354, 11.12.2014, p.47

3.9.5 Criterion 54: Chemical use minimisation (1.5 point)

Proposal for criterion 54: Chemical use minimisation (1.5 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 (e.g. copy of procedures, technical details of products used).

Rationale of Proposed Criterion text

- 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..."
- 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.
- With regard to the proposal of deletion of several criteria under Detergents and disinfectants section, several stakeholders suggested to reintroduce some of them as are considered as easy points and give the chance and flexibility to score the minimum points needed to award the license.
- It was mentioned that change habits on disinfection has been a lot effort for license holders and that the impact is very important. To remove lot criteria under this section is considered a step back.
- It was pointed out by stakeholders that mechanical cleaning is better than using chemicals.
- Based on these recommendations, the criterion on disinfectants is proposed to be part of the staff training criterion, while this criterion previously focused on mechanical cleaning is proposed to be formulated to cover any cleaning technique aimed at minimizing the use of chemicals.

Rationale of proposed "Assessment and verification"

- Some examples of documents for assessment and verification are included as requested by some CBs.

3.9.6 Criterion 55: De-icing (1 point)

Proposal for criterion 55: De-icing (1 point)

Where de-icing of roads is necessary, mechanical means, sand/gravel or de-icers that have been awarded a ISO Type I eco-label shall be used in order to make roads on the tourist accommodation ground safe in case of ice/snow.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation. When de-icers that have been awarded an ISO Type I eco-label are used, the applicant shall provide a copy of the type I label certificate.

Rationale of Proposed Criterion text

- BEMP primarily relates to minimising the use of chemicals on site, including those used for de-icing. However initially it was suggested to remove this criterion on the basis of its low potential environmental benefit compare to other criteria.
- As reply to the proposal to withdraw this criterion, many comments highlighted that it is a relevant criterion in cold climates, therefore it is suggested to be retained.

Rationale of proposed "Assessment and verification"

- A detailed description and certificates if applicable are part of the assessment and verification.

3.9.7 Criterion 56: Used textiles and furniture (2 points)

Proposal for criterion 56: Used textiles and furniture (2 points)

Tourist accommodation shall have a donation procedure in place for all furniture and textiles that reach the end of their usable life within the tourist accommodation but are still usable. End users shall include charity, employees and/or other associations which collect and redistribute 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. written procedure including end user contact details, receipts and records of goods previously donated etc.

Rationale of Proposed Criterion text

- BEMP 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.

- It is proposed that the criterion is clarified in order to specify that only products that are capable of reuse should be given to charity. In addition, the possibility to give the items to the employees has been included. Furthermore, it is suggested to remove the reference to electronic products as best practices concerning the end of life are to carry out controlled reuse and recycling activities, considering the toxic substances present in such products.

Rationale of proposed "Assessment and verification"

- Some examples of documentation, records and receipts which might be regarded as proof of compliance with this criterion have been included.

3.9.8 Criterion 57: Composting (up to 2 points)

Proposal for criterion 57: Composting (up to 2 points)

The tourist accommodation shall separate **at least one of** following relevant waste category **(1 point for each category, to a maximum of 2 points)**:

- yard waste
- food waste from restoration service,
- biodegradable products (e.g. disposable items made of corn-based materials),
- waste produced by guests at their room/accommodation,

and shall ensure that it is composted **and/or used for biogas production** according to local authority guidelines (e.g. by the local administration, in-house or by a private agency).

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

Rationale of Proposed Criterion text

- 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.
- It is proposed to keep the revised criteria. It is suggested that the criterion is aligned to Trip advisor Greenleaders and that biogas production is also included as recycling process, which also provides a source of energy as suggested by stakeholder’s

comments. Information related to composting methods and relevant material waste could be included at the User Manual in order to reduce complexity.

Rationale of proposed "Assessment and verification"

- A detailed description is requested as proof of compliance with this criterion.

3.9.9 Criterion 58: Waste water treatment (up to 3 points)

Proposal for criterion 58: Waste water treatment (3 points)

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

And/or

- b) Where it is not possible to send waste water for centralised treatment, on-site waste water treatment shall include pretreatment (sieve/bar-rack, equalisation and sedimentation) followed by biological treatment with > 95 % BOD (Biochemical oxygen demand) removal, > 90 % nitrification, and (off-site) anaerobic digestion of excess sludge. (2 points)

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

Rationale of Proposed Criterion text

- Current criterion O 66: Car washing only in specially outfitted areas, relates to waste water from car washing activities. BEMP suggested that wastewater management is a relevant environmental aspect related to the accommodation and best practices to ensure proper wastewater treatment and facilitate this as best as possible.
- In addition, BEMP suggests that 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.
- Against this background, the proposed criterion covers therefore current criterion on wastewater management from car washing activities and benchmark suggested in BEMP where no access to centralized waste water systems available, under a single optional criterion on wastewater treatment. The title has been reworded accordingly.

Rationale of proposed "Assessment and verification"

- The technical specification of the wastewater treatment system from professional technicians is requested if applicable.

3.10 Optional criteria related to other criteria

3.10.1 Criterion 59: No smoking in rooms (up to 1.5 points)

Proposal for criterion 59: No smoking in rooms (up to 1.5 points)

Smoking shall not be allowed in at least 80% of guests' rooms (rounded to the next integer) (1 point) or in 100% (1.5 points) of guests' rooms or rental accommodation.

Assessment and verification: The applicant shall indicate the number of guests' rooms and shall indicate which of these are non-smoking.

Rationale of Proposed Criterion text

- Taking into account that mandatory criterion bans smoking in all indoor common areas, the optional criterion is proposed to be modified to address the guest rooms.
- It is proposed to set two levels of compliance, granting the maximum score to the strictest one (100% no smoking rooms).

Rationale of proposed "Assessment and verification"

- The applicant shall indicate which rooms are allotted to be no smoking.

3.10.2 Criterion 60: Social policy (up to 2 points)

Proposal for criterion 60: Social policy (up to 2 points)

Tourist accommodation shall have a written social policy to ensure in addition to the prerequisite (3) related to staff rights, at least one of the following social benefits (subject to national taxes) for staff (0.5 point for each benefit, to a maximum of 2 points):

- a) Time off for education
- b) Free meals or meal vouchers.
- c) Free uniforms and work wear
- d) Discount on products/ services in the tourist accommodation,
- e) Subsidised sustainable transport scheme
- f) Caution to get house loan

Written social policy shall be updated and communicated to staff yearly. Staff shall sign the written policy at the communication session. The document shall be available at reception to all staff.

Assessment and verification: The applicant shall provide a copy of the written social policy and self-declaration explaining how the above requirements are met. In addition, the competent body may ask for documentary evidence and/or direct random staff interview during the on-site visit.

Rationale of Proposed Criterion text

- The initial criterion proposal aimed at assuring the compliance with the national legal requirements in respect to labour conditions as there might be several countries in Europe and beyond where this is an issue in the tourism sector. The proposal suggested CBs verification of documentation and random staff interviews for the verification having into consideration that 3rd party verification on social aspects is not an option for Tourist accommodation services as the use of social schemes is not a practice for such services. However, several Competent Bodies stated that is not

their role verifying such type of social verifications. In addition, there were also comments to the last criteria set proposal which recommended the social criterion to be a step further from the minimum legal provisions.

- Furthermore, it has been also highlighted during this process revision that EU Ecolabel is a label of excellence and that legal requirements shall not be included in the criteria set. A Competent Body suggested that this type of requirements shall be included in the pre-requisite section.

Against this background, for the social requirements/criteria it is proposed the following approach:

Legal pre-requisites:

The legal prerequisite in the current criteria set already state the following:

The enterprise is operational and registered, as required by national and/or local laws and its staff are legally employed and insured.

The text is suggested to be further specified by introducing specifications provided within the Sustainable Restoration scheme as suggested by stakeholders, which baseline criteria are written contract, minimum legal wage and working hours in accordance with the national law.

In addition examples of documentary evidence that applicants could provide to show compliance are further specified. Several example documents have been consulted with licence holders and stakeholders in the tourism sector in order to cover practical examples. The examples suggested, without prejudice of data protection national law, are the following:

- Copy of a written social policy (if complying with the optional criterion this shall be available)
- Copies of contracts
- Statements of employee's registration in the social security/national insurance system (eg. French DPAAE, Spanish TA.2/S)
- Official documentation/register recording the names and no. of employees by the local Government's Employment Inspectorate or Agent)

Furthermore, it is suggested to include the possibility to allow Competent Body that considers relevant to have a higher degree of assurance performing random interview during the on-site visit. (See section 2)

Optional criterion on social policy

The optional criterion is partially aligned to Sustainable Restoration scheme and to several suggestions made by stakeholders. This optional criterion is therefore focused on awarding points to social actions going beyond the legal labour requirements. This proposal was shared among some licence holders and one CB who agreed on its approach and content.

Rationale of proposed "Assessment and verification"

- There are two levels of assurance in the verification process proposed for this criterion. The first level is mandatory and consists of a declaration including social policy dated and signed by staff. The second level comprises the possibility of the CB requesting additional documents and/or interviews to staff during the on-site visit, if it is considered necessary.

3.10.3 Criterion 61: Tourist accommodation traffic management (up to 1.5 points)

Proposal for criterion 61: Tourist accommodation traffic management (up to 1.5 points)

- a) If the use of guests' vehicles is allowed within the tourist accommodation area, all traffic (guests and maintenance/transport) on the tourist accommodation site shall be limited to defined hours and areas. (0.5 point)

and/or

- b) If the maintenance of the tourist accommodation is carried out by use of vehicles, combustion motor vehicles shall not be used for this purpose. (1 point)

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

Rationale of Proposed Criterion text

- BEMP is to regulate traffic effectively to ensure minimisation of emissions and to optimise air quality.
- For the second criteria proposal (TR2.0), it was suggested to merge O 77: Regulation of campsite traffic and O 78: Campsite generated traffic (See [annex I](#) for current criteria), and to make it applicable to all tourist accommodation services and not "campsites only".
- In order to recognise that the requirement on limiting the traffic to some specific hours (criterion 61.a) is relatively easy to achieve, the number of points has been reduced for this requirement. Instead, more points are awarded for applicants that do not use combustion vehicles (criterion 61.b)

Rationale of proposed "Assessment and verification"

- The applicant should present an explanation as evidence of compliance.

3.10.4 Criterion 62: Environmentally preferable means of transport offer (up to 2.5 points)

Proposal for criterion 62: Environmentally preferable means of transport offer (up to 2.5 points)

- a) The tourist accommodation shall provide at least one of following environmentally preferable means of transport offer to guests (1 point each, to a maximum of 2 points):
- Electric vehicles for guests pick up service and/or for guest's leisure
 - Plugs (charging stations) for electric vehicles
 - At least 1 bike for every 5 guests.

And/or

- b) The tourist accommodation shall have active partnerships with companies providing any of the following environmentally preferable means of transport detailed in requirement a). (0.5 point).

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

Proposal for criterion 62: Environmentally preferable means of transport offer (up to 2.5 points)

and 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 (e.g. the bicycle hire company may deliver bikes to the tourist accommodation service).

Rationale of Proposed Criterion text

- The promotion of more environmentally-friendly transport solutions is recommended by one of the LCA reviewed, as transportation is found to be an environmental hotspot when it is included within the LCA boundaries.
- The criterion proposal is aimed at providing the guests with more environmentally preferable means of transport, either owned by the applicant or by means of partnerships with service providers. This approach complements the mandatory criterion on information about public transport and other preferable means of transport. The availability of charging stations is also awarded since the lack of a suitable infrastructure might discourage the use of electrical vehicles.
- According to some comments, the ratio bikes per guest is proposed to be modified to 1/5. It is also recommended that the bicycle hire company should be promoted by the applicant in order to make the guests aware of this service. It is also proposed to set some rules to have the bikes available at the TAS, where the company is located off site.

Rationale of proposed "Assessment and verification"

- The applicant should present an explanation and supporting documents if needed, as proof of compliance.

3.10.5 Criterion 63: Unsealed surfaces (0.5 point)

Proposal for criterion 63: Unsealed surfaces (0.5 point)

At least 90% of the open air area surface under management of the tourist accommodation 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 [tourist accommodation](#) fulfils this criterion, together with appropriate supporting documentation.

Rationale of Proposed Criterion text

- Current BEMP references EU Ecolabel requirements as good practice in management of outside areas, including O 80: Unsealed surfaces.
- Unsealed surfaces allow an increase of water filtration and diminution of water pollution associated to runoff from sealed asphalt surfaces, leading to a positive impact on biodiversity and wastewater management.
- EU Ecolabel promotes unsealed surfaces. Criterion remains as it is.

Rationale of proposed "Assessment and verification"

- The applicant should present an explanation and supporting documents if needed, as proof of compliance.

3.10.6 Criterion 64: Local and organic products (up to 3 points)

Proposal for criterion 64: Local and organic products (up to 3 points)
a) At least two locally sourced and not out of season (for fresh fruit and vegetables) food products shall be offered at each meal including breakfast (1 point)
and/or
b) The tourist accommodation actively chooses local suppliers of other goods and services (1 point)
and/or
c) At least 4 products used in daily meal preparation and/or sold in the shop shall have been produced by organic farming methods, as laid down in Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products ⁽⁴¹⁾ (1 point)
<p>For the purpose of this criterion local is considered to be within a 160 kilometres radius of the tourist accommodation.</p> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. Where organic products are used, the applicant shall provide a copy of the product certificate showing that it was awarded in accordance with the Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products⁽⁴²⁾. In some countries, it is possible for restaurants and hotels to be awarded by some labelling schemes when they use only organic products. Where a tourist accommodation is awarded by these types of schemes (or similar) this information could be provided as evidence of compliance with this criterion.</i></p>

Rationale of Proposed Criterion text

- 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 and organic where possible.
- In addition 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 was suggested for the second proposal (TR2.0) that this criterion could be broadened to include other local goods.
- Considering that current criteria 090.Local food products (up to 3 points) and 091. Organic food (up to 3 points) are closely related, it is decided to merge both criteria under a single criterion with the aim to simplify the whole criteria set. This criterion will remain optional.

⁽⁴¹⁾ OJ L 189, 20.7.2007, p.1

⁽⁴²⁾ OJ L 189, 20.7.2007, p.1

- Nevertheless, the definition of local might not be clear enough, therefore, it is proposed to include a definition of 'local' as within a 160 kilometres radius of the tourist accommodation, aligned to the Sustainable Restoration Scheme. This figure is based on a survey carried out in the UK in 2008 (The Hartman Group, 2008)

Rationale of proposed "Assessment and verification"

- In the case of organic products, the applicant will be requested to present a copy of the product certificate showing that it was awarded in accordance with the Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products. The certification according to national schemes for organic catering are also recognized as a proof of compliance.

3.10.7 Criterion 65: Pesticide avoidance (2 points)

Proposal for criterion 65: Pesticide avoidance (2 points)

Outside areas **under management of the tourist accommodation** shall be managed without any use of pesticides.

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.

Rationale of Proposed Criterion text

- Although organic gardening is not specified in BEMP, best practise suggests minimising the use of pesticides and other chemicals throughout the tourist accommodation.
- The criterion text of current *O70. Organic gardening* (See [annex I](#) for current criteria) is proposed to be simplified in order to make it clearer and stricter by limiting it to the absolute banning of pesticide use in outside areas in line with BEMP.
- It is specified that the scope of this criterion comprised the outside areas managed by the tourist accommodation.

Rationale of proposed "Assessment and verification"

- The applicant shall present a detailed explanation together with supporting documentation if needed.

3.10.8 Criterion 66: Additional environmental and social actions (up to 4 points)

Proposal for criterion 66: Additional environmental and social actions (up to 4 points)

Additional environmental actions (up to 0.5 points each, to a maximum of 2 points) **and/or social** actions (up to 0.5 points each, to a maximum of 2 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 **and/or social** performance of the tourist accommodation.

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

Proposal for criterion 66: Additional environmental and social actions (up to 4 points)

to be taken into account.

Rationale of Proposed Criterion text

- According to the stakeholder's comments, this criterion offers flexibility for applicants to get additional points for best practices that are not collected in the criteria set. Some of these additional actions might be further taken into account to be part of the criteria set in future revisions.
- Social actions are also proposed to be introduced in the revised criteria, which is in line with the new optional social criterion proposed in this revision.
- Regarding the risk of double-scoring, the stakeholders highlighted that the final decision on granting the points for this criterion is made by the auditor and the competent body, whose expertise and knowledge minimize this risk.

Rationale of proposed "Assessment and verification"

- For the assessment and verification, the applicant shall prepare a detailed description of each additional action.

4 Impact of changes to criteria after AHWG2

Criteria simplification:

With the aim to simplify the criteria set and to focus on the main environmental aspects, for the second proposal (TR2.0), criteria considered of low environmental benefit were either directly removed or proposed for deletion. However, there was a general view from stakeholders on the potential risk of losing current licence holders. In order to reach a compromise, it has been carried out an exercise of assessment of the level of fulfilment of those criteria whose removal was being under discussion. The idea was to introduce those that are relevant for stakeholders but allocating fewer points regarding the low environmental benefit associated to them.

The analysis was carried out for 623 Tourist accommodations (*107 Campsite services & 516 Tourist Accommodation services*) currently awarded with the EU Ecolabel. The percentages are displayed in Table 11.

Table 11. Level of fulfilment indication of optional criteria of lower environmental significance

Current criteria	AHWG2 proposal	Number of licence holders fulfilling the current criteria
040. Energy performance audit	Proposed to be removed	5.6%
043. Bioclimatic architecture	Proposed to be removed	23.6%
045. Hand driers with sensors	Proposed to be removed	50.0%
046. Refrigerator positioning	Proposed to be removed	70.0%
048.Sauna timer control	Proposed to be removed	18%
57. Tap water temperature and flow	Proposed to be removed	70.3%
58. Shower timers	Proposed to be removed	25.0%
60. De-icing	Proposed to be removed	32.2%
63. Indigenous species outdoor planting	Proposed to be removed	39.3%
068. Swimming pools: Dosage of	051. Swimming pools: Dosage of	36.0%

Current criteria	AHWG2 proposal	Number of licence holders fulfilling the current criteria
disinfectants or natural/ecological swimming pools	disinfectants or natural/ecological swimming pools (removal under discussion)	
070. Organic gardening	052. Organic gardening (removal under discussion)	49.3%
071. insect and pest repellents	053. Insect and pest repellents (removal under discussion)	29.0%
65. Indoor and outdoor paints and varnishes	Proposed to be removed	18.0%
66. Car washing in special areas (campsite only)	Proposed to be removed	71.9%*
67. Alternative BBQ lighters	Proposed to be removed	13.9%
69. Mechanical cleaning	Proposed to be removed	59.2%
76. Used textiles, furniture and other products	056. Used textiles, furniture and other products (removal under discussion)	37.0%
075. Run-off from car parks (campsite only)	Proposed to be removed	10%*
087. Use of rechargeable products	063. Rechargeable products (removal under discussion)	28.4%
088. Paper products	064. Paper products (removal under discussion)	64.5%
089. Durable goods	065. Durable goods (removal under discussion)	32.6%
080. Unsealed surfaces (campsite only)	058. Unsealed surfaces (campsite only) (removal under discussion)	74.7%*
081. Roof landscaping	059. Roof and façade landscaping (removal under discussion)	5.3%
090. Local food products	066. Local food products (removal under discussion)	70.7%
091. Organic food	067. Organic food (removal under discussion)	32.9%
079. Trolleys for guests (campsite only)	Proposed to be removed	34.5%*
085. Pick up service	Proposed to be removed	5.1%
092. Indoor air quality	Proposed to be removed	8.9%
097. Additional environmental actions	Proposed to be removed	79.6%

*Percentage calculated on the 107 campsite services

As a result, those criteria showing a low fulfilment level have been definitively proposed for removal at the current proposal (TR3). The cut off has been established at 30% fulfilment. In the table above, the criteria shaded in blue colour have been finally suggested to be deleted. Exceptionally, current criterion *046. Refrigerator positioning* is still proposed for withdrawal though having a high degree of fulfilment. This criterion is considered to be vague and with a very low environmental benefit associated. In addition, the point allocation for the reintroduced criteria has been revised according to the potential environmental benefit. Besides the deletion of 13 criteria, requirements addressing the same hotspot have been merged where possible aiming to make simpler the whole criteria structure resulting in a total number of 66 criteria in contrast to the current set which consists of 97 criteria. (See Table 2 and Table 4)

Structure and scoring rules

An exercise of 'points' allocation has been carried out in order to keep the same structure and the scoring rules of the points system currently in force. The potential environmental benefit highlighted in LCA/BEMP and the investment needed to implement the criteria as indicated by

stakeholders, have been consider when allocating points. Additionally, criteria have been partially ordered to better reflect the environmental hotspots they address and as a result of stakeholders request on introducing criteria on management in first place.

Figure 6 and

Table 12 below compare the current and updated allocation of points per category, for tourist accommodation. This shows that although the criteria structure is updated, thanks to the proposed allocation of points, the overall impact of the simplification and ordering of criteria in points is limited.

Figure 6: Allocation of points per category (energy, water, waste etc.) for the current and updated EU Ecolabel for tourist accommodation

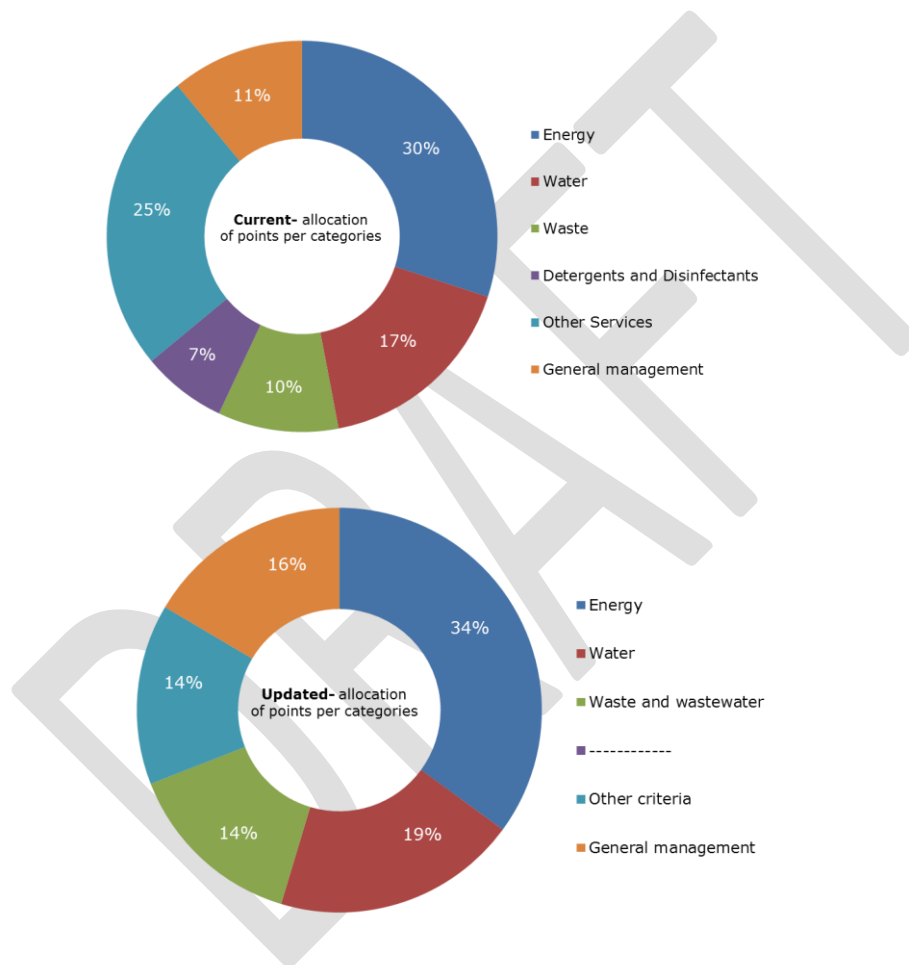


Table 12: Maximum number of points achievable for current and updated optional criteria

Criteria category	Tourist accommodation service (CSS)	Criteria category	Tourist accommodation product group
	Current - maximum points achievable		Updated - maximum points achievable
Energy	36.5	Energy	42
Water	20	Water	23.5
Detergents and Disinfectants	12 (13)	-----	
Waste	9 (10)	Waste and wastewater	18.5
Other Services	30 (34)	Other Criteria	17
General Management	13.5	General Management	19

Total score	121(127)	Total score	121
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The updated allocation 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, it is recommended that at least one optional criterion shall be met in order to assure that applicants choose optional criteria among all the six category sections covered in the criteria set.

The text concerning the minimum points is aligned to the text of the Commission Decision currently in place and just a new text has been introduced to oblige the mandatory fulfilment of at least one optional criterion within each category (see the text below).

Preamble text extract. For more details on the wording consult the preamble published along with this TR3

Article 3

- (1) In order to be awarded the EU Ecolabel under Regulation (EC) No 66/2010, a service shall fall within the product group ‘tourist accommodation’, as defined in Article 1 of this Decision and shall fulfil all of the following requirements **in relation to applicable** criteria as well as the related assessment and verification requirements set out in the Annex:
 - (a) it shall comply with each of the criteria set out in Section A of the Annex to this Decision;
 - (b) it shall comply with at least one criterion for each of the subsections (energy, water, waste and wastewater and other criteria) in section B.**
 - (c) it shall comply with a sufficient number of the criteria set out in Section B of the Annex to this Decision, in order to acquire the requisite number of points as referred to in paragraphs 3, 4, 5 and 6.
- (2) For the purposes of paragraph 2(c), the tourist accommodation service shall acquire at least: 20 points for the main service.
- (3) The points referred to in paragraph 3 shall be increased by any of the following, if provided under the same management or ownership of the tourist accommodation service:
 - (a) 3 points for food services;
 - (b) 3 points for green/outside areas available to guests;
 - (c) 3 points for leisure/fitness activities or 5 points if the leisure/fitness activity consists in a wellness centre.
- (4) For the purposes of paragraph 2(c), the campsite service shall acquire at least:
 - (a) 20 points for the main service;
 - (b) 24 points if other accommodation facilities, suitable for the provision of shelters for lodgers, are provided in addition
- (5) The points referred to in paragraph 5 shall be increased by any of the following, if provided under the same management or ownership of the campsite service:
 - (a) 3 points for food services;
 - (b) 3 points for green/outside areas available to guests, which are not part of the campsite structure;
 - (c) 3 points for leisure/fitness activities or 5 points if the leisure/fitness activity consists in a wellness centre.

Ambition level:

For the revision process of this product group, in addition to the regulation update and wording clarification, there was a general view on the importance of revising thresholds and ambition level. In general the ambition level of the revised criteria has been increased and clarification on the criteria text and verification sections has been introduced where possible aiming to decrease the burden associated to impractical wording.

Specifically, in the mandatory section, the following criteria have been subjected to an increase of ambition level:

Criterion 1 - Basis of an Environmental Management System

Criterion 4 - General maintenance
Criterion 5 - Consumption monitoring
Criterion 6 - Energy efficient space heating and water heating appliances
Criterion 7 - Energy efficient air conditioning and air-based heat pumps appliances
Criterion 10 - Outside heating and air conditioning appliances
Criterion 11 - Procurement of electricity from a renewable electricity supplier
Criterion 13 - Efficient water fittings: Bathroom taps and showers
Criterion 14 - Efficient water fittings: urinals
Criterion 16 - Waste prevention: Food service waste reduction plan
Criterion 17 - Waste prevention: Disposable items
Criterion 19 - No smoking in common areas
Criterion 20 - Promotion of environmentally preferable means of transport

With regards to the optional section, data provided by French Competent Body revealed that the minimum points needed to achieve is relatively easy to score for applicants. In the case of TAS, more than 80% of the sample of licence holders assessed scored above 31 points while the minimum needed is 20 (29 if 3 all the auxiliary services are provided). In the case of CSS, more than 90% of the sample of licence holders assessed scored between 31 and 40 points while the minimum needed is 24 (33 if 3 all the auxiliary services are provided). See below detailed ranges of scoring for the applications selected:

Sample of 100 TAS:

- ☒ 16% have between 20 and 30 points
- ☒ 48 % have between 31 and 40 points
- ☒ 28% have between 41 and 50 points
- ☒ 6% have between 51 and 60 points
- ☒ 2 % have more than 61 points

Sample of 17 very small TAS (cottages & B&B):

- ☒ they have between 21 and 34 points

Sample of 40 campsites:

- ☒ 6% have between 24 and 30 points
- ☒ 25 % have between 31 and 40 points
- ☒ 40% have between 41 and 50 points
- ☒ 27% have between 51 and 60 points
- ☒ 2 % have more than 61 points

This data revealed that there is a significant potential for improvement and increase of ambition level. Specifically, in the optional section, the following criteria have been subjected to an increase of ambition level:

Criterion 23 - EMAS registration or ISO certification of suppliers (up to 5 points)
Criterion 24 - Ecolabelled services (up to 4 points)
Criterion 27 - Energy efficient space heating and water heating appliances (up to 3 points)
Criterion 28 - Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)
Criterion 29 - Air-based heat pumps up to 100 kW heat output (3 points)
Criterion 30 - Energy efficient household appliances (up to 4 points)
Criterion 32 - Thermoregulation (up to 3 points)
Criterion 36 - Space Heater NOx emissions (1.5 points)
Criterion 37 - Procurement of electricity from a renewable electricity supplier (4 points)
Criterion 38 - On site self-generation of electricity through renewable energy sources (up to 5 points)
Criterion 41 - Efficient water fittings: Bathroom taps and showers (up to 4 points)
Criterion 42 - Efficient water fittings: Toilets and urinals (up to 4.5 points)
Criterion 43 - Dishwasher water consumption (2.5 points)
Criterion 44 - Washing machine water consumption (3 points)
Criterion 46 Optimised pool management (up to 3 points)
Criterion 51 - Durable goods (up to 3 points)

- Criterion 52 - Beverages provision (2 points)
 Criterion 58 - Waste water treatment (up to 3 points)
 Criterion 59 - No smoking in rooms (up to 1.5 points)
 Criterion 60- Social policy (up to 2 points)
 Criterion 62 - Environmentally preferable means of transport offer (up to 2.5 points)
 Criterion 65 – Pesticide avoidance (2 points)

Additionally to the revision of thresholds, the simplification of the criteria structure results in an additional degree of ambition level raise. This is due to the fact that for the updated version there are fewer options to be selected by applicants among the optional criteria.

The overall update 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. However, in most cases, the proposal is aligned to other environmental labels and/or reflects market availability of certain products.

Indicative assessment of minimum point's achievement:

Although points are the same and the current average scored points revealed a sensible margin for potential increase of the ambition level, the resulting fewer optional criteria and higher stringency level of several updated criteria could impact on general achievement of minimum points. With the aim to evaluate the feasibility and impact of the update, an indicative assessment of point's achievement has been carried out. According to the information provided, normally small accommodations that do not provide extra services, face more difficulties on achieving the minimum points. It is important to assess the impacts of a change to point's allocation to ensure that the EU Ecolabel for tourist accommodation is still achievable for those organisations in scope, especially for the more limited cases. It has been indicatively assessed the potential uptake of the updated optional criteria for an accommodation without auxiliary extra services. In addition, two scenarios have been considered to assess the influence of other limiting aspects as the access to certified products/services and the limited investment capacity of certain organisations. The evaluated scenarios are:

- A. A tourist accommodation which has no access to product or services with national or international ISO Type I labels but it is capable to carry out a medium level of investments/interventions.
 B. A tourist accommodation which has access to product or services with national or international ISO Type I labels but has no means for investments or interventions.

Table 13 shows the indicative points achievable for a tourist accommodation without auxiliary services in both scenarios described above.

Table 13: Maximum points available for tourist accommodation without food services, outside areas and fitness/wellness centres for each scenario

Updated optional criterion	Scenario A: -No access to Ecolabelled products/services -Medium investment/interventions	Scenario B: -Access to Ecolabelled products/services -Low investments/interventions
General management		
Criterion 22 - EMAS registration, ISO certification of the tourist accommodation (up to 5 points)	0	0
Criterion 23 - EMAS registration or ISO certification of suppliers (up to 5 points)	0	2
Criterion 24 - Ecolabelled services (up to 4 points)	0	0
Criterion 25 - Environmental and social communication and education (up to 3 points)	3	2

Updated optional criterion	Scenario A: -No access to Ecolabelled products/services -Medium investment/interventions	Scenario B: -Access to Ecolabelled products/services -Low investments/interventions
Criterion 26 – Consumption monitoring: Energy and water sub-metering (up to 2 points)	2	0
Energy		
Criterion 27 - Energy efficient space heating and water heating appliances (up to 3 points)	1	0
Criterion 28 - Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)	1.5	0
Criterion 29 – Air-based heat pumps up to 100 kW heat output (3 points)	0	0
Criterion 30 - Energy efficient household appliances (up to 4 points)	2	1
Criterion 31 - Heat recovery (up to 3 points)	1.5	0
Criterion 32 - Thermoregulation (up to 3 points)	1.5	1.5
Criterion 33 - Automatic switch off appliances/devices (up to 4.5)	1.5	0
Criterion 34 - District heating/cooling and cooling from cogeneration (up to 4 points)	2	0
Criterion 35 - Electric hand driers with proximity sensor (1 point)	0	1
Criterion 36 - Space Heater NOx emissions (1.5 points)	1.5	1.5
Criterion 37 - Procurement of electricity from a renewable electricity supplier (4 points)	0	0
Criterion 38 - On site self-generation of electricity through renewable energy sources (up to 5 points)	3	0
Criterion 39 - Heating energy from renewable energy sources (up to 2 points)	1.5	0
Criterion 40 - Swimming pool heating (up to 1.5 points)	0	0
Water		
Criterion 41 - Efficient water fittings: Bathroom taps and showers (up to 4 points)	2	2
Criterion 42 - Efficient water fittings: Toilets and urinals (up to 4.5 points)	1.5	0
Criterion 43 - Dishwasher water consumption (2.5 points)	0	0
Criterion 44 - Washing machine water consumption (3 points)	0	0
Criterion 45 - Indications on water hardness (up to 1 points)	1.5	0.5
Criterion 46 Optimised pool management (up to 3 points)	0	0
Criterion 47 -Rainwater and grey water recycling (up to 3 points)	1	1
Criterion 48 - Efficient irrigation (up to 1.5 points)	0	0
Criterion 49 - Indigenous species used in outdoor planting (1 point)	0	0
Waste and wastewater		
Criterion 50 –Paper Products (up to 2 points)	0	2
Criterion 51 - Durable goods (up to 3 points)	0	2
Criterion 52 - Beverages provision (2 points)	0	0
Criterion 53 - Detergents and toiletries procurement (up to 2 points)	0	2
Criterion 54 - Chemical use minimisation (1 point)	1	1
Criterion 55 - De-icing (1 point)	0	0

Updated optional criterion	Scenario A: -No access to Ecolabelled products/services -Medium investment/interventions	Scenario B: -Access to Ecolabelled products/services -Low investments/interventions
Criterion 56 - Used textiles and furniture (2 points)	2	2
Criterion 57 - Composting (up to 2 points)	0	0
Criterion 58 - Waste water treatment (up to 3 points)	0	0
Other criteria		
Criterion 59 - No smoking in rooms (up to 1.5 points)	1.5	1.5
Criterion 60- Social policy (up to 2 points)	2	1
Criterion 61 - Tourist accommodation traffic management (up to 1.5 points)	0	0
Criterion 62 - Environmentally preferable means of transport offer (up to 2.5 points)	1.5	0.5
Criterion 63 - Unsealed surfaces (0.5 point)	0	0
Criterion 64 - Local and organic products (up to 3 points)	1	1
Criterion 65 – Pesticide avoidance (2 points)	0	0
Criterion 66 – Additional environmental and social actions (up to 4 points)	2	2
Tourist accommodation TOTAL	39	27.4

For a tourist accommodation without food services, outside areas and a fitness/wellness centre, the maximum number of points is:

- 20 for tourist accommodation services – in both scenarios this number of points is achievable
- 24 for campsite services – this number of points is also achievable in each of the scenarios above.

As shown by the analysis above, the number of points currently required is feasible for each scenario.

Although there is a clear raise of general ambition level it can be concluded that the updated proposal is still achievable. However, as suggested by a Competent Body it is proposed a longer transition period between the current and revised Commission Decisions to be allowed for this product group aiming to assimilate progressively the changes introduced in the criteria set. Instead of 12 months as currently proposed for other product groups, it is suggested to have a transition period of 18 months. (See the preamble document published along with this TR3)

As a result of the revision it is expected to keep most of the current licensees with a high environmental performance standard, associated to the proposed ambition level, while attracting new applicants as a consequence of a more clear and focused criteria set.

5 Stakeholder comments during and after second Ad Hoc Working Group meeting

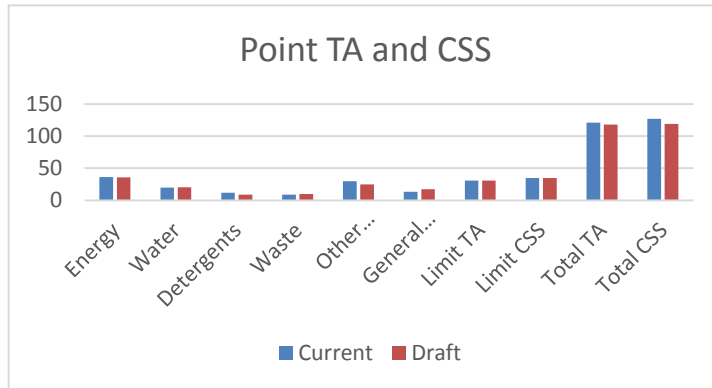
	Comments received in AHWG2/written form	JRC IPTS response
General comments		
Criteria simplification	<i>We think it's better to have a large choice of optional criteria. Because there are different types of TACS (size, level of services, and influence of climate...). We can handle it.</i>	<p>Partially accepted</p> <p>The aim of the revised criteria is to focus on the environmental hotspots in order to optimize the environmental savings. In addition, criteria addressing the same hotspot have been merged with the aim to have a more compact and focused criteria set. With the aim to not lose licences, an analysis have been carried out for 623 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the criteria considered to be of low environmental impact. Criteria having a low fulfilment degree compare to other optional criteria have been definitively removed.(see section 4)</p>
	<i>It is a pity to remove so many criteria, they are relevant for small business and this will not simplify their work to get the EU ecolabel. On the contrary, they will not be able to achieve the certification anymore. In Brittany, we are the 1st French region with 64 certified accommodations. With this kind of measure, we will lose at least half of our certified business</i>	
	<i>Fewer requirements do not equal a more simple criteria document. From a CB point of view 100 requirements is not a problem to handle. And we hear the same from the license holders; they do not have a problem with a lot of point requirements. It is important to set relevant point requirement and keeping the flexibility which is necessary for service criteria which is covering sites ranging from small B&B to hotel chains.</i>	
	<i>We appreciate the investigating that is being done on which criteria are being used in present licenses. But this investigating cannot be used as justification to delete other criteria! In the proposal the required points are the same as today – this shall be higher to ensure an improvement, and then the not used criteria are important!</i>	
	<i>Please also refer to the Nordic Ecolabel for ideas for other criteria. There are 39 points criteria and this is not hindering a high uptake of license holders!</i>	
	<i>We have doubts concerning the criteria simplification. While we understand the benefits of a simplified criteria set, we remind that many criteria with little environmental impact can strengthen and make visible the “green” image of the tourist accommodation and therefore contribute to educate customers. We therefore support the views expressed by hotels managers and campsites owners highlighting the added-value of these numerous criteria.</i>	
	<i>We must be careful not to lose licenses. The number of optional criteria is very important to achieve the maximum points, in particular for small structures. Maybe it would be interesting to investigate the possibility to set different levels of maximum points taking account of the size of the structure.</i>	
	<i>Please be aware if the number of criteria is reduced, also the required points have to be recalculated! There are some TA with very limited possibilities to reach points at all. For them the required points might be a hurdle if there are not enough criteria to score.</i>	
<i>We agree in principle. However the stringency should remain the same. Therefore lowering the threshold of the minimum number of points gathered should be considered.</i>	Accepted	

	<p><i>We support simplification, but then it should be deeply analysed before. We cannot lose licences because we are taking away optional criterias. I hope the input that comes from the CB-s that has licences helps to make right decisions.</i></p> <p><i>We agree on the need of simplify the criteria, but we think that it is very dangerous to reduce the number of optional criteria, because there are small-familiar tourist accommodations that have not many options to get the minimum punctuation because they not offer many extra services. It would be a pity to lose this kind of accommodation services that on the other hand are very committed with the environment. We propose to reduce the number of mandatory criteria, leaving only the most relevant, and leave a large number of optional criteria. To ensure the environmental behaviour of the accommodation and that consumers perceive that it is an ecolabelled accommodation, we propose that the punctuation has to be obtained from different environmental aspects energy, water, waste, etc. to avoid that companies have all the optional points related only with an environmental aspect.</i></p> <p><i>The proposal contains about 71 criteria, of which 25 are mandatory and 46 are optional. I noticed that this is an improvement from the ≈100 criteria in the first draft, but still this is too much. There is room for simplification.</i></p> <p><i>Significant reduction of the number of criteria, both mandatory and optional, is a necessary goal. In particular criteria that are not tackling environmental hotspots should not be kept. To counterbalance the reduction of the number of optional criteria the minimum score required should be reduced as well</i></p>	<p>With the aim to not lose licences, an analysis have been carried out for 623 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the criteria considered to be of low environmental impact. Criteria having a low fulfilment degree compare to other optional criteria have been definitively removed.</p> <p>The general level of ambition has been increased. An indicative assessment to evaluate if the stricter revised criteria set is still achievable has been included within this document.(see section 4)</p>
<p>Scoring points and criteria rearrangement</p>	<p><i>We are against the suggestion to score minimum points per section. Especially if the number of criteria (per section) is reduced, the remaining criteria might then become mandatory for some TA with limited possibilities to score.</i></p> <p><i>We agree that in the additional criteria, minimum score for each area should be reached. But we strongly suggest (we undertook a wide study on the 40 Eu-ecolabelled accomodation structures in our Province) to plan additional enviromental actions and thus bonus points for each area. Bonus section for each area (1,5 p per additional actions underraken in each area) To make the Eu-Ecolabel more flexible with the goal of meeting the different situations and conditions of very different accomodation structures throughout Europe</i></p>	<p>Partially accepted</p> <p>By introducing minimum points for each of the sections we assure that criteria among each relevant section are chosen. However with the aim to recognise that to set a number of points might be too prescriptive, alternatively it is suggested to request that applicants shall score at least an optional criterion for each of the subsections.</p> <p>Partially accepted</p> <p>Additional environmental actions will be reintroduced but we do not see the need of including at each of the sections as we consider that the criteria set is already flexible regarding the wide amount of diverse criteria which recognise the different regional, climatic, structural and infrastructural conditions. It is suggested to request that applicants shall score at least an optional criterion for each of the subsections.</p>
<p>Scope and definitions</p>	<p><i>To include conference services in the product group is reasonable.</i></p> <p><i>We agree on the general definition of the scope of Tourist Accommodation and Campsites Services. However, we recommend completing the definition of the Tourist Accommodation by adding the following (in bold): "green areas include parks and gardens, which are open to guests and which are under the management of the accommodation." We consider that there is no point to take areas into account where the campsite owner has no influence.</i></p>	<p>Accepted</p> <p>Partially accepted</p> <p>Text has been reworded as follow: "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, <u>which are under management of</u></p>

		<i>the accommodation provider and are open to guests and conference facilities includes the provision of a room for singular events such as business conferences, meetings or training events".</i>
	<i>For clarity sake the name of the product group might be "Accommodation services" instead of "Tourist accommodation"</i>	Rejected The product group name suggested is Tourist accommodation in order to specify that the accommodation service refers to the provision of facilities to tourists. In addition, the stakeholder questionnaire and feedback received at an initial stage of the revision process revealed an overall support for merging TAS and CSS into a common set of criteria, titled "tourist accommodation".
Ambition level	A stakeholder expressed their desire to have more stringent criteria. From industry side, a stakeholder mentioned that they will score 20 points less due to the modifications however they will be still above the minimum. Other industry stakeholder expressed that several hotels of their chain will not reach the minimum needed as regard to the modifications made.	Partially accepted The level has been raised through the deletion of non-relevant criteria (applicants will need to choose criteria associated to higher environmental benefit) and the inclusion of tougher thresholds in several criteria. Although, the total points are kept it would be more difficult to score a point.
	Another Competent Body suggested that the % of TA awarded with the EU Ecolabel is very low. They mentioned that it is lower than 1% and that the EU Ecolabel normally targets the 10-20% of the market. Thus, to make the criteria stringent should not be the philosophy.	With the aim to not lose licences, an analysis have been carried out for 623 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the criteria considered to be of low environmental impact. Criteria having a low fulfilment degree compare to other optional criteria have been definitively removed. The general level of ambition has been increased. An indicative assessment to evaluate if the stricter revised criteria set is still achievable has been included within this document.(see section 4)

Only the percentage of renewable electricity and the plan to substitute light pulps are changed fundamentally in the mandatory section. If not introducing new boilers or the like.

In the point section also only little changes are seen. This is also stated in the technical report. But the intention of the revision was to increase the stringency of the criteria – which there was a broad consensus for at the EUEB. Please also see the table below



Please also note that the environmental impact for the different criteria is not reflected in the amount of points gained.

We find the point's allocation to different actions in the optional requirement part not proportional. For example a heat pump is awarded 1.5 points while electric hand and hair driers with proximity sensor are awarded 1 point. Our question is if the environmental benefits gained from a heat pump and installation of hair driers with proximity sensor are almost equal. We believe that the point's allocations should be differentiated so that it would be proportional with the environmental improvement of the installation. If the applicant has made a big investment in an efficient energy saving installation then it should be awarded enough points so that the applicant would not need to make many small investments to appliances with much less effect on environment

On site visit

We think it's important to keep as mandatory, at least one on site visit (before awarding the licence). The on-site visit gives the opportunity to see more concrete elements. For example with a documentary audit the non conformity is difficult to detect. That keep credible this certification. Most TACS appreciate the on site visit because they can show their commitments and find tracks of improvement.

An audit shall be mandatory. To keep a credible certification an onsite visit for a product group like this is needed. For some areas like environmental management systems, or implemented improvement an audit is needed. For member states with many licenses this may cause a heavy burden but this practical issue shall be solved in another way.

We recommend the JRC maintaining mandatory requirements on on-site visits as we think that this is the best way to verify and assess the compliance of the accommodation capacities with the EU Ecolabel criteria.

Mandatory site visit before awarding the licence. We understand the need for site visit and we can

Accepted

A specific text in the general assessment and verification section in reference to a mandatory initial on-site visit and optional follow up on-site visits has been introduced with the aim to reflect the general agreement on the importance of having at least a mandatory on-site visit before the awarding of the license for this product group.

	<p><i>support it, but it will be difficult for us to plan budget for that. As we are planning budget in end of year. As governmental authority we cannot ask money from applicants if it is not saying that in law.</i></p> <p><i>An audit shall be mandatory. To keep a credible certification an on-site visit for a product group like this is needed.</i></p>	
	<p><i>We find the on-site visits very useful and important. However it may not be feasible for CBs with a lot of licences. Two options: On-site visits only recommended. On-site visits obligatory, CBs may contract external assessors to perform them.</i></p>	<p>Partially accepted</p> <p>Most of stakeholders and Competent Bodies agree on the importance of having at least a mandatory on-site visit. A specific text in the general assessment and verification section in reference to a mandatory initial on-site visit and optional follow up on-site visits has been introduced with the aim to reflect the general agreement on the importance of having at least a mandatory on-site visit before the awarding of the license for this product group. As far as we understand CBs perform the on-site visit either with internal or external auditors. We not see the need of specifying that external auditor may be contracted by the Competent Body.</p>
<p>Promotion of EU ecolabel products vs other Type ISO I labels</p>	<p><i>A general comment was made by several stakeholders concerning the deletion of the possibility to purchase other Type I Ecolabel products in several optional criteria. They were against this and suggested to keep the possibility to score points if other type of labels is purchased.</i></p> <p><i>We have to be careful, because it depends on the category of products available on the market. For example there is no EU Ecolabel sanitary tapware in Europe.</i></p> <p><i>In some criteria only EU Ecolabeled products will count (Criterion 50) in contradiction to the present criteria where also other type 1 ecolabels are counted. Other types of labels like the Nordic Ecolabel, Blaue Angel and other national labels shall also count in order to reflect the difference in available ecolabelled products. This is needed in order to give the applicants better possibilities to achieve points.</i></p> <p><i>We agree that the purpose of ecolabelling is to support sustainable consumption as such. Therefore we would not limit the possibilities only to products with EU Ecolabel.</i></p> <p><i>Danish comment: Type 1 labels should be equal like EMAS and ISO. It is a strange signal the EU Commission sends to national ecolabel schemes, when only accepting EU ecolabelled products. Denmark proposes that ISO 14.024 Type 1 labels are treated equal.</i></p> <p><i>We support other type I ecolabels also in criteria, because in Estonia there are a lot of Nordic Swan products in market. We support ecolabbed products and services and I think that when we say only EU ecolabeled products for tourism, then we are getting less licences. But if possible, it is acceptable also other type I ecolabel products, but you can get some extra points for EU ecolabeled products.</i></p> <p><i>We propose to include, as verification, products have national or regional ISO Type I ecolabels, not only EU Ecolabel. We have attached a list of the products that have the regional ecolabel. Currently the ecolabels are not broadly known by consumers, for that we think that it is important to take advantage of the synergies that could be between the different ecolabelling systems and take advantage of the benefits that imply the mutual recognition between schemes.</i></p> <p><i>Type I labels should be equal like EMAS and ISO. We don't agree to accept only EU Ecolabel products. For some EU Ecolabel product groups: there are no licences. For some EU Ecolabel product group: the EU Ecolabel products are not necessarily available in all Member States. Points should be given also to ISO 14024 Type I labels. Once again it is very</i></p>	<p>Accepted</p> <p>For all criteria where EU Ecolabel is requested or is considered to be a means of proof, the alternative to use other ISO Type I labels has been included.</p>

	<i>important for small structures.</i>	
Other general comments	<p>With reference to art. 3 (3), 4), (5) and (6) with the aim to simplify the score system of this Decision it should be very helpful:</p> <p>-- define a common minimum score to be achieved by every applicant irrespective of any additional service offered (food, or green areas etc.);</p> <p>-- clearly state that criteria referring to additional services only don't apply to main service. (e. g. criterion on efficient irrigation doesn't apply to accommodation services without green areas).</p>	<p>Accepted</p> <p>The preamble has been clarified and several criteria referring to specific services offered have been specified further.</p>
	<p>With the aim to avoid misunderstanding it should be very helpful to define the more significant terms/expressions used (all over the Annex but mainly with reference to energy criteria) in a Definition Section.</p> <p>Suggestions:</p> <p>Definitions</p> <p>"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 (art. 2 (a) of 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 and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC);</p> <p>"space heating generating capacity" (1):.....</p> <p>"water based space heater" (1):.....</p> <p>"water heater":.....</p> <p>"hot water boilers":.....</p> <p>"locally sourced":grown no farther than 100 km from the accommodation premises</p> <p>"third party certification":.....</p> <p>Other relevant terms used in the Annex:.....</p> <p>Note: reference should be made to definitions in:-- Commission Decision 2014/314/EU of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters,</p> <p>-- Commission Regulation (EU) n. 812/2013 of 18 february 2013,</p> <p>-- Council Directive 92/42/EEC of 21 May 1992</p> <p>-- ecc</p>	<p>Partially accepted</p> <p>Key definitions are included in the criteria. However as this product group consist in a large amount of criteria and refers to a high number of regulation (especially for appliances) to include the definitions for all the appliances may have a marked impact on the length of the legal text. Instead only key definitions are included and the reference to the regulation for appliances is made. In addition we suggest following the current approach for this product group which include a list of definitions on the User manual. Concerning the regulation references, this will be made in final annex according to the harmonised rules with regard to the inclusion of references in EU legal texts.</p>
	<p>The "Pre-requisite section" should be moved before the "Assessment and verification" section.</p>	<p>Rejected</p> <p>This section is partially harmonised with other EU Ecolabel product groups.</p>
	<p>Specific requirements on employment should be addressed as pre-requisite.</p> <p>It should be specified that the infringement of this prerequisite entails the dissolution of the EU Ecolabel contract.</p> <p>In yellow suggested parts</p> <p>Pre-requisite</p> <p>As pre-requisite, the services must meet all respective legal requirements of the country (countries) in which it is they are located. In particular, it shall be guaranteed that:</p> <ol style="list-style-type: none"> 1. The physical structures s are is built legally and respects all relevant laws or regulations of the area on which it is they are built, especially any related to landscape and 	<p>Partially accepted</p> <p>Legal pre-requisites required in the current EU Ecolabel for TAS and CSS text in force are proposed to be maintained. However the text has been amended as follow:</p> <p>-The revised point 1 has been further specified to address two of the current criteria (M5. Energy efficiency of buildings and M6. Window Insulation) as they are mainly addressing legal requirements.</p> <p>-The social part (revised point 2) has been extended to better reflect staff legal requirements.</p> <p>-The text for assessment the prerequisites has been amended to</p>

	<p><i>biodiversity conservation.</i></p> <p>2. <i>The physical structures 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.</i></p> <p>3. <i>The enterprise is operational and registered, as required by national and/or local laws and its staff are legally employed and insured.</i></p> <p><i>Applicants shall ensure as a minimum the following fundamental principles and rights at work for their employees:</i></p> <p><i>(a) The accommodation has implemented a policy against commercial, sexual or any other form of exploitation and harassment, particularly of children, adolescents, women and minorities.</i></p> <p><i>(b) The accommodation offers equal employment opportunities to women, local minorities and others, including in management positions, while restraining child labour.</i></p> <p><i>(c) The international or national legal protection of employees is respected, and employees are paid at least a living wage.</i></p> <p><i>(d) Employees' working hours comply with national or international law or benchmark industry standards, whichever affords employees most protection.</i></p> <p><i>(e) Employees are free to enter their employment through their own choice / leave their employment when they choose without penalty.</i></p> <p><i>The applicant shall declare the service's compliance with these requirements and demonstrate compliance, using independent verification or documentary evidence (e.g. copies of contracts, salaries slips, national social security system registration numbers of employees, construction license/authorization, etc). This will be checked during the on-site visit. Verification shall include interviews to staff (phone and/or onsite).</i></p>	<p>request additional evidence to show compliance for the legal requirements. (See section 2)</p>
	<p><i>The format of the brochure that the accommodation service may distribute to guests should be attached as an example to the User Manual</i></p>	<p>Rejected</p> <p>How the EU Ecolabel is implemented in each different type of accommodation may differ and there is no a single template for a brochure communicating their environmental actions. The current approach allows certain flexibility to applicants to provide the information in the way they find more suitable.</p>

	<p>In yellow suggested parts</p> <p><i>Assessment and verification</i> <i>The specific assessment and verification requirements are indicated within each criterion set out in Sections A and B.</i> <i>Where the applicant is required to provide declarations, documentation, analyses, test reports, or other evidence to show compliance with the criteria, these may originate from the applicant and/or their supplier(s) as appropriate.</i></p> <p><i>In general, self declarations should be avoided since it is very difficult / impossible to verify them. Declarations of compliance if any must be accompanied by documents providing certified evidence of compliance with the criteria.</i> <i>Any reference to Decisions / Regulations or other official documents should be limited to the title and legal references data to simplify the text and to avoid unnecessary complications in case of amendments of these documents.</i></p> <p><i>Competent Bodies shall preferentially recognise attestations which are issued by bodies accredited according to the relevant harmonised standard for testing and calibration laboratories and verifications by bodies that are accredited according to the relevant harmonised standard for bodies certifying products, processes and services.</i></p> <p><i>The CB that recognizes an attestation issued by a body not accredited according to the relevant harmonised standard for testing and calibration laboratories or a verification by a body that is not accredited according to the relevant harmonised standard for bodies certifying products, processes and services shall inform the Commission and the other CBs through the EU Ecolabel Helpdesk about its decision and the relevant documented explanation.</i></p> <p><i>Where appropriate, test methods other than those indicated for each criterion may be used if the Competent Body assessing the application accepts their equivalence.</i></p> <p><i>The CB that recognizes the equivalence of a test method shall inform the Commission and the other CBs through the EU Ecolabel Helpdesk about its decision and the relevant documented reasons.</i></p> <p><i>Where appropriate, Competent Bodies may require supporting documentation and may carry out independent verifications.</i> <i>Where on site visit is required, the Competent Body shall carry out independent verification.</i></p> <p><i>Within the duration of the EU Ecolabel license the applicant shall keep all documents presented to the CB during application that demonstrate the respect of criteria set out in section A as well as the respect of relevant criteria set out in section B.</i></p>	<p>Partially accepted</p> <p>This text is partially horizontal for the EU ecolabel products however the text has been amended according to some of the suggestions made. (See section 2).</p>
	<p><i>1-To be workable in big data, Europe-wide and over time, consumption figures and clients questionnaires ought to be standardized, numerized and collected at European's level</i></p> <p><i>I am pretty sure, no one stake holders is aware that the European commission cannot use information and figures collected by the certifying bodies.</i> <i>It was one of Bruxelles meeting's major learning and surprise for all of us.</i></p> <p><i>On the contrary, Ecolabel holders are expecting to be fedback with benchmarks, trends and analysis. Anonyma could be preserved by communicating only group figures (cf INSEE trackings per activity in France which provides market share figures...).</i> <i>Isn't possible to make it mandatory to share figures with Europe, or at least to ask for the stake holder's agreement.</i></p>	<p>Rejected</p> <p>It is a common practice for tourist accommodation sites to email guests with details of bookings etc. These methods of communication could be used to include information on the EU Ecolabel logo, licence number and the environmental policy with the aim to promote the EU Ecolabel and to raise awareness on the environmental policy of the accommodation. However, the possibility of including a mandatory criterion on this has been discarded as the regulation does not oblige the applicant to display the logo in the product/service. (See section 3.1.3)</p>

	<p><i>At the same time, the subject is so strategic, we are not willing to give it to a private consultant whose activity is to sell advise on our activity (as it seems to be in project in France financed ADEME on European funds)</i></p> <p><i>2- Ecolabel big data Huge awareness and image potential I am also convinced there is a huge opportunity in terms of public relation for European Ecolabel. It could help to rise image and awareness on the label. Actually, there is a real shortage in consumer and market data on these questions as evidenced by the poor marked study in the Ecolabel Revision file.</i></p> <p><i>Publishing trackings is a very effective tool to get media; Many agencies do trakings on that purpose. The audits could provide a reliable tourism tracking with high quality information over the years and a fine analysis of the different countries and type of accommodations.</i></p> <p><i>Ultimately, Ecolabel efficiency on helping the accommodations to become more sustainable, seems difficult to assess without figures.</i></p> <p><i>3- Mandatory criteria linked with visibility of the logo Registration on the European site and Visibility of the Ecolabel logo should be compulsory (cf Organic European logo with the green leave which labelling is compulsory – you cannot claim organic if you do not show the logo on your product – this is actively controlled in all organic fairs)</i></p> <p><i>Add Optional criteria in other Ecolabel product referential, in order to incite using Ecolabel Certified places for business accommodation travels or leisure incentives (end of year present, internal touristic agency, gift boxes...)</i></p>	
Criteria proposal V2 (current criteria)		
<p>Criterion 1 - Procurement of electricity from a renewable electricity supplier</p> <p>(M1. Electricity from renewable sources)</p>	<p><i>A CB suggested including energy consumption thresholds.</i></p> <hr/> <p><i>It needs to be clarified how the 2nd paragraph is intended. How is this verifiable and what if the possible percentage vary over time?</i></p> <hr/> <p><i>We favour keeping the limits as they are now for the sake of keeping the current holders. The possibility of raising the percentage to 100 % should be considered again at the next revision.</i></p> <hr/> <p><i>we welcome the change to 50% RES and awarding points for additional percentage. The derogations</i></p>	<p>Rejected</p> <p>Benchmarks of excellence in BEMP are based on benchmarks across Europe and Passive house standard. The standard states that the values are appropriate for central Europe and suggests that values may be revised for other climate areas. Other schemes as Nordic Swan proposes limits, however it considers three different climatic areas among Nordic countries. No other environmental labels for tourism services using this type of criteria.</p> <p>Instead, the EU Ecolabel proposes the consumption from RES, efficient equipment and Energy management Systems criteria that in overall has an impact on final consumption instead of introducing a threshold that might not be applicable to all accommodations in EU and beyond.</p> <hr/> <p>The paragraph on the variable RES% depending on the suppliers availability has been deleted.</p> <hr/> <p>Accepted</p> <p>It is suggested to have a mandatory requirement on procurement of 50% RES electricity in order to recognise that some countries might</p>

	<p><i>in the requirement shall be described better to avoid different interpretation.</i></p>	<p>have difficulties to offer competitive prices of green tariffs (if available) and/or allow direct unbundle purchase. The proposal attempts to recognise the situation as it currently exists in Europe but is considered to be a first step.</p> <p>In order to go a step further the optional criteria awards those applicants purchasing the 100% labelled electricity. More points are allocated in this criterion recognising the potential environmental benefit. (See section 3.2.6)</p>
	<p><i>"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."</i></p> <p><i>Electricity generation from geothermal energy normally entails investments in multi-megawatt units. There are no geothermal electricity generation devices available at household's or multi-storey dwelling's level. Maybe the authors referred to geothermal heating (heat pumps) which is a widespread renewable heating technology.</i></p> <p><i>On the opposite, I wonder why biomass is not mentioned. Tourist sites often use solid biomass (wood, wood chips, pellets) or biogas for combined heat and power production. These are available technologies in almost all Member States.</i></p> <p><i>This is a very confusing, though crucial definition:</i></p> <ul style="list-style-type: none"> <i>- Does "additional" allude to the fact that the mere disclosure of the fuel mix, based on Guarantees of Origin (GOs) does not provide any additional environmental benefit ("additionality" criteria for renewable electricity tariffs)?</i> <i>- Does "verifiable" refer to existing "green electricity" quality labels that are run in many Member States in order to monitor and certify different additionality criteria?</i> <p><i>It is confusing that "verifiable" and "additional" seem to be tied to the supplier. "Green electricity" quality labels normally certify the electricity tariff, i.e. the product, and not the supplier as a whole. The different "additionality" criteria applied in different Member States also refer to the electricity tariff, i.e. to the effects of purchasing kilowatt-hours, and not by becoming a client of a certain company which is much more difficult to measure in terms of environmental benefits.</i></p> <p><i>Or do the authors mean that eco-labelled tourist sites should at best purchase electricity tariffs from suppliers that solely offer 100% renewable electricity tariffs? This could limit the range of choice only in some Member States because there are only a few suppliers on the market that sell solely 100% renewable tariffs. Many incumbent suppliers with a mixed portfolio offer tariffs that are covered by 100% renewable GOs while they still sell tariffs that are not covered by renewable GOs.</i></p> <p><i>But from the point of view of environmental NGOs, this is not decisive when it comes to identifying the environmental benefits of consumers' choice. Regardless of selling only 100% renewable tariffs or not, disclosure of GOs alone does not deliver any environmental benefit. Suppliers should offer tariffs that are transparent and display compliance with measurable environmental minimum criteria (e.g. using customers' money for investments in new generation capacities).</i></p>	<p>Partially accepted</p> <p>In relation to best practices, BEMP stated that the annual generating capacity of off-site renewable installations directly supported by the accommodation's investment may be considered equivalent to on-site renewable generation. However, attributing additionality ("consumption of European green electricity leads to the increase of green electricity generation compared to what otherwise would have occurred" as defined by www.windmade.org) to purchased renewable electricity is complex. BEMP authors expressed that the requirement for traceability and exclusive accounting of renewable electricity consumption provides a useful indication of additionality and that another potential indicator is that purchased renewable electricity should originate from new capacity, installed within the past e.g. two years.</p> <p>In other hands, using electricity ecolabels is a way to prove additionality and to go one step further. Third party verified and independent Ecolabels include special or additional criteria for electricity production and can also fund projects such as the building of new renewable energy installations.</p> <p>It is suggested to have a mandatory requirement on procurement of 50% RES electricity in order to recognise that some countries might have difficulties to offer competitive prices of green tariffs (if available) and/or allow direct unbundle purchase. The proposal attempts to recognise the situation as it currently exists in Europe but is considered to be a first step.</p>
	<p><i>If the 50% criterion refers to the electricity tariff, this is not and has never been an ambitious demand. In most Member States, suppliers can easily cover one of their electricity tariffs with 50% renewable GOs without any relevant additional costs since there has always been a huge oversupply of renewable GOs, thanks to Scandinavian hydro power GOs.</i></p> <p><i>If the 50% criterion refers to the supplier's fuel mix, this is more or less ambitious for the supplier, depending on the average national fuel mix. In many Member States, suppliers can just rely on the</i></p>	<p>In order to go a step further the optional criteria awards those applicants purchasing the 100% labelled electricity. (See section 3.2.6)</p>

	<p>default average national fuel mix in order to fulfill the legal fuel mix disclosure provisions of the Directive. That means that any Austrian supplier normally will easily comply (with around 70% hydro power in the national Austrian mix) while only some Belgian suppliers with a dedicated renewable purchase policy would reach the 50% threshold as the national Belgian mix is only around 8% renewables.</p> <p>Regardless if the 50%/100% criterion refers to the tariff or to the supplier, every supplier has to publish its fuel mix in precontractual information on the tariff and in an annual statement, according to the Directive. The customer automatically receives this information about the fuel mix. It is not necessary that a hotel manager asks his supplier for a special declaration.</p> <p>This is self-evident. GOs are only available for the renewable energy sources mentioned in the Directive. However, the text suggests that the supplier explicitly would have to be requested to refer solely to these sources.</p>	
	<p>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." This shows that focusing on a supplier does not necessarily clarify the environmental impact. But did this NGO comment mean that one should establish the tariff's fuel mix instead of the supplier's fuel mix as the key criterion? Did stakeholders discuss if it would be better to opt for a 100% renewable tariff from this supplier whose supplier fuel mix is only 50% renewable?</p>	
	<p><i>Guarantees of Origin are tradable certificates under the RECS (Renewable Energy Certificate System) regime. That's not correct. GOs are fixed in the Directive as the instrument for tracking and disclosing attributes of renewable electricity. The RECS regime is a privately organised precursor of the current GO system which does not exist as such any more. The national GO issuing bodies nowadays use the European Energy Certificate System - "EECS".</i></p>	
	<p>From the point of view of many environmental NGOs, importing renewable GOs in order to disclose them for marketing purposes while still producing/trading fossil and/or nuclear power is simply "green wash".</p>	
	<p>While the name of "Compania Escandinava de Electricidad en Espana" already suggests that this supplier just trades Scandinavian hydro power GOs and sells fossil/nuclear electricity, the other seemingly 100% renewable suppliers in the table could do the same. Only an ambitious "green electricity" quality label could control if customers' money is really spent for renewable kilowatt-hours.</p>	
	<p>Austria is the only Member State using a GO tracking system that obliges suppliers to match each renewable kilowatt-hour with the renewable GO from the exactly the same renewable power plant. "Fake" and "facade" tariffs are excluded thanks to this rule which our Austrian member VKI and BEUC welcome as best practice. So only in Austria consumers pay for exactly the same electricity which is disclosed with the help of GOs on their bill.</p>	
	<p><i>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/) This suggests that EKOenergy would be a functioning label in all Member States but according to the EKOenergy annual report, EKOenergy licensed only 11 suppliers in Finland and 7 traders/suppliers in 5 other Member States: Latvia: Baltcom and Prudentia Energy Markets (both from Latvia),</i></p>	<p>Accepted It is suggested to request 100% certified electricity for optional criterion. (see section 3.7.11)</p>

	<ul style="list-style-type: none"> • Spain: Gesternova, • Slovenia: HSE • Italy: Multiutility • Germany: Polarstern and Bischoff & Ditze Energy GmbH (both from Germany). • Turkey: GTE Carbon • Russian Federation: R.E.S. Ltd (ВИЭнерго). 	
	<p>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. What does the text ask for: the product mix (tariff's fuel mix) and/or the supplier's mix?</p>	<p>Accepted The text has been clarified and tariff mix or guarantees of origin may be used for the % consumption calculation (See section 3.2.6)</p>
	<p>How big problems it will cause if we require 100 %? How many of the present license holders as a matter of fact use electricity from unrenovable sources?</p>	<p>Rejected Requesting 100% RES as mandatory criterion might have an impact</p>

	<p><i>In line with the Best Environmental Management Programme (BEMP), hotel managers and campsites owners should first of all be encouraged to make investments in renewable energy use on the premises, including renewable electricity generation (solar panels, wind energy, limited sustainable biomass, hydropower) and heating systems (solar thermal collectors, geothermal heat pumps, biomass heating systems, etc). As electricity generation capacities and heating systems are visible and contribute to green the energy supply of the accommodation, those investments should be reflected in EU Ecolabelled tourist services.</i></p> <p><i>If no renewable electricity generation is feasible at the site, hotel managers and campsite owners have to refer to the national electricity market. While it is a widespread assumption that the liberalisation of energy markets would bring more competition, lower prices and better information on broader range of energy products, consumers in many Member states are still waiting to reap the benefits of truly competitive, consumer-friendly energy markets allowing them to make sustainable choices. Therefore, full enforcement of existing internal energy market legislation, Third Energy Package in particular, is fundamental.</i></p> <p><i>Consumers in at least 15 Member States can already opt for renewable electricity tariffs covered by renewable Guarantees of Origin (RES-GOs). There are more and more such “green” tariffs offered, as well as suppliers emerging whose fuel mix is at 100% based on RES-GOs. In a context of growing renewable electricity offers, we welcome the criterion requiring that “100% of the electricity procured shall come from renewable energy sources” and we appreciate that the threshold has been raised from 50% to 100% in the new draft proposal. We understand this criterion as relating to both the product’s fuel mix as well as the supplier’s fuel mix, as disclosed to final customers, according to the Internal Electricity Market Directive 2009/72/EC.</i></p> <p><i>However, as RES-GOs can be traded independent of the electricity sold to consumers, suppliers may still produce, trade and market non-renewable energy sources behind a “green façade”. Therefore, 100% renewable electricity offers and suppliers alone do not necessarily bring any environmental benefits. The renewable kilowatt-hour would have been produced anyway because the renewable power plant already benefited from a national support scheme, from selling electricity to wholesale markets or from other remuneration models. With constantly low prices, renewable energy plant operators do neither depend on selling RES-GOs nor do RES-GOs incentivise investments in new capacities.</i></p> <p><i>Finally, we remind that renewable tariffs should bring the environmental benefits that consumers expect. These benefits must be measurable and go beyond business as usual. Consequently, minimum criteria regarding environmental benefits of “green” tariffs are needed. Examples for such standards could be:</i></p> <ul style="list-style-type: none"> <i>- a binding communication on additionality to the regulator and to the consumer.</i> <i>- nationally harmonised, but voluntary definition of criteria</i> <i>- or transparent national “green electricity” quality labels such as EKOenergy.</i> <p><i>Questionable reasoning: The lack of 100% renewable GO tariffs or 100% renewable suppliers is not primarily caused by a lack of renewable GOs imports. Renewable electricity generation exists in every Member State. Since demand for such 100% renewable tariffs is still low and/or implementation of the GO tracking system incomplete (as just explained by the authors), 15 of 29 Member States have 100% renewable tariffs on their markets as of 2014 (CEER advise, March 2015). Trading in renewable GOs should not be the essence of renewable electricity offers, at least from the point of view of environmental NGOs .</i></p>	<p>on loss of current licence holders or migration of licence holders to other environmental labels. Although there are available suppliers in many countries in Europe the cost of their tariffs is not competitive in several countries. In addition, many of the suppliers that appeared recently on the market does not offer tariffs to suitable to accommodations as they are only available for domestic use. Furthermore, although buying GOs appears to be a cheaper option in the countries where this practice is available the increase from 50% to 100% may impose an extra economic burden that might be too much for applicants that are already investing money to comply with the whole criteria set.</p> <p>In addition, a benchmark of excellence in BEMP is that equivalent of 50 % of the accommodation’s annual energy use is generated by on-site renewable sources, or by verifiably additional off-site renewable energy sources. (See section 3.2.6)</p>
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Thanks for the interesting discussion so far. We understand that the Secretariat doesn't want to create a 'psychological barrier', scaring hotels away. However, we hope that there are other ways to 'soften' the requirement than by reducing the percentage to 50% (as compared to the original proposal). As one of the attendees noticed, it may also help to replace the requirement to a location further in the text. Also the availability of an escape route ("This criterion does not apply to a tourist accommodation that") is important.

Hereafter, we repeat why we think 100% is an obvious requirement, the only logical choice for a European ecolabel.

1) The discussion about the proposed changes has often been based on 'feelings' and 'fears' rather than on facts. On a truly liberalized market, 100% renewable is NOT difficult and NOT expensive. Tens of millions of European consumers, have a 100% renewable electricity contract, and the number grows week after week.

EKOenergy has suggested to all the participants who claimed at the stakeholder meeting 'that buying 100 is very difficult', to start a common project. We have recruited a trainee to help hotels and other tourist accommodations to ask offers for 100% renewable contract. We are still waiting for the written reactions from the hotels

2) During the debate several speakers confused 100% renewable electricity contracts with supplier mixes and with national production mixes. The same mistake is now made in the argumentation of the updated text (as reformulated after the stakeholder meeting). A 100% renewable electricity contract means a contract which is 100% proven by Guarantees of Origin of renewable electricity production. Any European supplier can make use of this system, which is set up by all EEA-States (and Switzerland) in implementation of art. 15 of the Renewable Electricity Directive.

It does not mean that all the electricity of the supplier or of the country has to be green.

It also doesn't mean that complex new control mechanisms have to be developed, as one of the state representatives seemed to suggest.

I have never heard an argument that it is impossible to require FSC-labeled, fair trade, organic, recycled, whatever... 'because only 20% of the current supply fulfills this standard'. Rather opposite. If already 20% is ecological, the European Ecolabel should fully support it and make sure that the other 80% follow.

Even if half of the hotels would adopt the ecolabel standard, we cannot imagine that the total consumption would exceed 1% of the total EU electricity consumption. So yes, there is enough renewable electricity on the market to cover a 100% green electricity demand from the tourist accommodation sector.

3) 100% green contracts are very common on competitive markets.

They are indeed almost inexistent on monopolized markets or recently liberalised markets. However, we think the European ecolabel cannot take the situation on recently liberalised markets as a starting point. Rather to the contrary, the label should help to push the liberalisation and the competition ahead. The liberalisation of the electricity market is one of the key targets of the EU Energy Policy.

4) It doesn't make much sense to ask a "50% green electricity contract".

- On very liberalised markets, there are no 50% green electricity contracts. That would commercially not make sense. A contract is either green, or it is not green.

- On monopolistic and hardly liberalised markets, it is as difficult to get a 50% green electricity contract as to get a 100% green electricity contract. As such, this is not an argument to stick to 50%. (This is particularly true in France, from where most of the comments came.)

5) There is a growing move towards a 100% renewable economy. And more and more standards

Rejected

Requesting 100% RES as mandatory criterion might have an impact on loss of current licence holders or migration of licence holders to other environmental labels. Although there are available suppliers in many countries in Europe the cost of their tariffs is not competitive in several countries. In addition, many of the suppliers that appeared recently on the market do not offer tariffs suitable to accommodations as they are only available for domestic use. Furthermore, although buying GOs appears to be a cheaper option in the countries where this practice is available the increase from 50% to 100% may impose an extra economic burden that might be too much for applicants that are already investing money to comply with the whole criteria set. In addition, a benchmark of excellence in BEMP is that equivalent of 50 % of the accommodation's annual energy use is generated by on-site renewable sources, or by verifiably additional off-site renewable energy sources. (See section 3.2.6)

	<p>require or recommend 100% renewable electricity contracts. LEED, Green key, RE100,... Also CDP and Greenhouse Gas Protocol push companies in that direction. It would be very strange if the European ecolabel, which aims at the 10% best, would not follow that trend.</p> <p>6) During the debate, several people made comments that are not based on facts. In this note we only comment on the one that has been listed in the (draft) minutes: "A stakeholder mentioned that in Germany the applicants are not willing to buy that green electricity as is too expensive." -> this is not supported by the facts. Germany is a country where consumers massively choose for green electricity contracts. In 2012 already 20% of the Germans had a 100% green contract (see http://www.abendblatt.de/politik/deutschland/article112869837/Jeder-fuenfte-Deutsche-bezieht-mittlerweile-Oekostrom.html).</p> <p>The amount of contracts has since only grown. We don't have exact data about the percentage using 100% green. But the cancellation of Guarantees of Origin (the proof of green electricity contracts) has risen tremendously in Germany in the last 2 years, as becomes clear from the annual report of the AIB (http://www.aib-net.org/)</p> <p>Concluding-> It's a good idea to have an exception clause. In the current draft this is: "This criterion does not apply to a tourist accommodation that has no access to a supplier that offers electricity generated from renewable energy sources". If that would reassure the sector, when could even add "or when the 100% green electricity offer would lead to an increase in the electricity price of more than 5%".</p> <p>--> We agree with the remark that it is as important to focus on energy savings. But it is not one OR the other. It is one AND the other.</p>	
	<p>Most of the audited German campsites told me if the percentage of the electricity come from renewable energy sources will increase they will not be able to go for another auditing for the EU-Ecolabel. For some of them it is too expensive.</p> <p>Keep the 50% and give mandatory points for 100% of electricity come from renewable energy sources like it used to be.</p>	<p>Accepted</p> <p>It is suggested to have a mandatory requirement on procurement of 50% RES electricity in order to recognise that some countries might have difficulties to offer competitive prices of green tariffs (if available) and/or allow direct unbundle purchase. The proposal attempts to recognise the situation as it currently exists in Europe but is considered to be a first step.</p> <p>In order to go a step further the optional criteria awards those applicants purchasing the 100% labelled electricity. (See section 3.2.6)</p>
	<p>We support this criterion. However this verification can only be used in countries where the regulation for Renewable Energy Guarantees of Origin is implemented. Therefore we wonder how this would work for an applicant outside Europe and, especially how we can check there that they have no access to renewable electricity on the market.</p>	<p>Accepted</p> <p>Outside EU (e.g Turkey, see: http://www.ekoenergy.org/es/buying-ekoenergy/licensees/) it is possible to buy GOs and certify them against a ecolabel. Applicants in such countries might be able to go for the mandatory and optional criterion and provide the contract as a means of proof. Where these types of suppliers are not available applicants will be exempted .Although the exemption is getting less relevant lately as the green electricity offer is increasing it should be kept in order to recognise that some countries are still behind the average and applicants are not responsible of this situation.</p>
	<p>It should stay: "At least 50% of electricity used for all purposes shall come from renewable energy sources..." More extensive use of electricity from renewable energy sources should be granted with</p>	<p>Partially accepted</p> <p>At least 50% has been included in the mandatory criterion.</p>

	<p>optional points. "To at least 75%, and 100% should be assigned optional points"</p>	<p>In order to go a step further the optional criteria awards those applicants purchasing the 100% labelled electricity. More points are allocated in this criterion recognising the potential environmental benefit. In addition, current proposal will probably lead, where tariffs and/or unbundle purchase are available, to the compliance of optional criteria as more points could be awarded and most of the suppliers provide a 100% green tariff where they operate. (See section 3.7.2)</p>
	<p><i>This criterion should be optional. Small business can hardly afford 50%. The will not apply anymore with such a requirement.</i></p>	<p>Rejected Consumers in at least 15 Member States can already opt for renewable electricity tariffs covered by renewable Guarantees of Origin (RES-GOs) and separate purchase of GOs. (See section 3.2.6)</p>
	<p><i>This criterion should not be the 1st. When you explain the criteria to a potential candidate, the first thing you say is: you have to pay more for green electricity. Then, they think they will have to pay for each criteria they want to fulfil. It is not a good preamble.</i></p>	<p>Accepted Criterion has been moved</p>
	<p><i>We support 50% of electricity from renewable energy sources and optional 100%.</i></p> <p>Suggested rewording 100% of the electricity procured shall come from renewable energy sources, as defined in Directive 2009/28/EC of the European Parliament and of the Council.(1) Biomasses o biogas used as renewable energy sources shall be produced no farther than 70 km from the power plant in which they are used (short supply chain). Tourist a Accommodations service 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. In these cases electricity procured that doesn't come from renewable energy sources shall not be produced from coal nor from heavy oils having a sulphur content higher than 0.1%. This criterion does not apply to an tourist accommodation service that has no access to a supplier that offers electricity generated from renewable energy sources. Binding contract restrictions (such as the provision of penalties) for the change of power supplier are considered as 'no access' to a market that offers electricity generated from renewable energy sources. In this case as soon as that contract expires, the applicant shall choose a new contract for the supply of electricity that fulfills the criterion and shall inform the CB. 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 service 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 If relevant the applicant has to provide documents attesting binding restrictions in the contract in force.</p>	<p>Rejected Renewable Energy sources definitions are linked to the RES Directive. Specific references to types of RES or distance of the RES production are not made as this will introduce an additional degree of complexity that may impose an extra burden to applicants and CBs. The procurement options of off-site RES are in line with the European system of RES distribution, the EECs (European Energy Certificate System) and two options are provided (green tariff and unbundle purchase of GOs). The criterion is flexible and we do not see the need of having the exception of binding restrictions as (if available) the applicant may procure GOs with no need to shift from their traditional supplier. (See section 3.2.6)</p>

	<p><i>Third party certification must be provided attesting that biomasses or biogases have been produced no farther than 70 km from the power plant they feed.</i></p>	
	<p>(1) In case the tourist facilities are located in an EU or non-EU Member State having a liberalised electricity market with suppliers providing so-called “green” electricity offers⁴³, i.e. tariffs that disclose a fuel mix containing 100% renewable energy sources⁴⁴, the tourist accommodation shall purchase 100% of its electricity consumed exclusively under such an electricity contract.</p> <p>This requirement is fulfilled either in case the overall fuel mix marketed by the supplier is disclosed as being 100% renewable or in case the product fuel mix of the purchased tariff is disclosed as being 100% renewable.</p> <p>(2) The non abovementioned Member States are exempted from this requirement and are allowed to statistically convert the fuel mix of their electricity tariff to a share of 100% renewable energy sources through the unbundled purchase of Guarantees of Origin which are traded in line with the Principles and Rules of Operation of the European Energy Certificate System (EECS). However, this exemption applies only if the following conditions are met:</p> <p>(a) If it is proven that there are no available renewable electricity tariffs backed by Guarantees of Origin (GO) available on the national electricity market;</p>	<p>Partially accepted</p> <p>Thresholds are not aligned to the suggestion made as requesting 100% RES as mandatory criterion might have an impact on loss of current licence holders or migration of licence holders to other environmental labels. Although there are available suppliers in many countries in Europe the cost of their tariffs is not competitive in several countries. In addition, many of the suppliers that appeared recently on the market do not offer tariffs suitable to accommodations as they are only available for domestic use. Furthermore, although buying GOs appears to be a cheaper option in the countries where this practice is available the increase from 50% to 100% may impose an extra economic burden that might be too much for applicants that are already investing money to comply with the whole criteria set. Furthermore, a benchmark of excellence in BEMP is that equivalent of 50 % of the accommodation’s annual energy use is generated by on-site renewable sources, or by verifiably additional off-site renewable energy sources. However, the wording has been modified in accordance to suggestion provided with the aim to clarify that either overall fuel</p>

⁴³ Amongst the EU Member States, electricity suppliers offer at least one “green” tariff disclosing 100% renewable energy sources in its fuel mix in the following 15 national markets: Austria, Belgium, Denmark, Estonia, Finland, France, Germany, Italy, Luxemburg, the Netherlands, Portugal, Slovenia, Spain, Sweden, United Kingdom, see: Agency for the Cooperation of Energy Regulators (ACER)/Council of European Energy Regulators (CEER): Annual Report on the Results of Monitoring the Internal Electricity and Natural Gas Markets in 2013, October 2014, p. 42-45. “Green” tariffs are also available in the non-EU Member States Norway and Switzerland

⁴⁴ The annual mandatory fuel mix disclosure statement of the electricity supplier discloses a fuel mix with a share of 100% renewable energy sources. The renewable share is tracked and verified with the help of Guarantees of Origin (GOs) in compliance with the legal obligations on consumers’ right to be informed about the fuel mix, established in the Internal Electricity Market Directive 2009/72/EC, art. 3(9), and the Renewable Energy Directive 2009/28/EC, deliberations (52-54). Renewable energy sources are defined in the Renewable Energy Directive 2009/28/EC, art. 2.

	<p>(b) If a request has been made to the local default electricity supplier and at least three other potential national suppliers for an electricity tariff that discloses a fuel mix of 100% renewable energy sources;</p> <p>(c) If the national regulations of both the exporting and the importing country provide domain protocols that were accredited by the Association of Issuing Bodies (AIB) under the Principles and Rules of Operation of the EECs in order to avoid double counting in case the customer opts for an unbundled purchase of GOs.</p> <p><i>Assessment and verification:</i></p> <p>(1) <i>The applicant shall supply the annual fuel mix disclosure statement from and the contract with the electricity suppliers, indicating the nature of the renewable energy source(s), the countries of origin of the GOs and the percentage of electricity supplied that is from a renewable source.</i></p> <p>(2) <i>The applicant shall supply the declarations from the electricity suppliers to fulfil criterion 2.b and the contract(s) with the <u>guarantees of origin</u> supplier(s) indicating</i></p>	<p>mix or product fuel mix are accepted for the % of RES requested. In addition, in order to avoid the double counting of GOs risk associated to unbundled purchase, the condition on AIB accreditation of the GOs supplier has been introduced for applicants going for the alternative option. (See section 3.2.6)</p>
<p>Criterion 2 - Coal and heavy oils. (M2 - Coal and heavy oils)</p>	<p><i>It is indicate that the coal is prohibited as an energy source, can you tell me if it means that coal can not be used as a cooking energy as for barbecue in CSS ?</i></p> <p><i>It seems to be interesting to have a specific wording on this point on the revision.</i></p> <p><i>How relevant this requirement is?</i></p> <p><i>What about the TAS outside Europe ? For example : Jordan and Egypt which have participated to the shmile 2 program. This project had a target to bring 5 hotels to the EU Ecolabel, they have no fuel conform with this criterion.</i></p> <p>Suggested rewording</p> <p><i>No heavy oils having a sulphur content higher than 0.1% and no coal shall be used as an energy source in the accommodation grounds. Coal for decorative fireplaces is excluded from this criterion. This criterion only applies to tourist accommodation services that have an independent heating system.</i></p> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, indicating the nature of the energy sources used. The relevant technical documentation from suppliers must be provided demonstrating the nature and characteristics of the energy source.</i></p>	<p>Partially accepted</p> <p>The coal used in barbecue is charcoal which is from vegetal origin in contrast to fossil mineral coal which is the one used in boilers for heating purposes. No additional clarification has been introduced concerning this.</p> <p>Although these heating systems are not used in major part of Europe we see relevant to keep this criterion for the minor part of EU and third countries where such boilers might still be a practice. In addition, it is suggested to check this criterion during the onsite visit. (See section 3.2.7)</p>
<p>Criterion 3 - Efficient space and water heating appliances (M3. Efficiency and heat generation)</p>	<p><i>We agree with the criteria for new water heaters but we propose to remove the criteria on existing hot-water boilers. Currently we do not have any tourist accommodation with hot-water boilers because the requirement is too strict and it represents a huge investment for companies. It is not logical and has not sense from an environmental point of view to oblige companies to change the hot-water boiler if it is working well now. Currently we have 20 accommodation services and 1 campsite and all works with renewable energies.</i></p> <p>Suggested rewording</p> <p><i>... The license holder should have to inform the CB about the new installation.</i></p> <p><i>If a new water heater is installed within the duration of the EU Ecolabel license, the efficiency shall be:</i></p> <p><i>Declared load profile ≤ S: energy class A</i></p> <p><i>Declared load profile > S: boilers: energy class A</i></p> <p><i>Declared load profile > S: heat pumps: energy class A+</i></p>	<p>Rejected</p> <p>It is suggested to keep this requirement. There are already many licences for this product group in compliance with this mandatory criterion. It is proposed to not increase the ambition for existing appliances but only for new appliances.(See section 3.2.1)</p> <p>Partially accepted</p> <p>For all criteria applying to new acquisitions, a text has been introduced to specify that applicant shall inform CBs about the acquisition and provide the relevant documentation at this stage. (See section 3.2.1)</p>

	<p>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. <i>The license holder should have to inform the CB about the new installation.</i> <i>Comment:</i> to make the above table more clear it would be helpful to separate the last two lines from the others. Moreover GWP values for the most used gases should be listed nearby. It should be possible verify the respect of the criterion simply using nameplate of the appliance and data referring to the characteristics of the gas used</p>	
	<p><i>Criterion 3 bis – Automatic management and monitoring system</i> <i>Heating/air conditioning systems installed within the duration of the EU Ecolabel license shall be equipped with an automatic management and monitoring system.</i> <i>The license holder should have to inform the CB about the new installation.</i> <i>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.</i></p>	<p>Rejected Sub metering is already addressed as optional criterion. The criterion on heaters is already a comprehensive criterion and it is proposed to not introduce an additional degree of complexity by introducing monitoring automatic systems in the mandatory criterion. (See section 3.2.1)</p>
<p>Criterion 4 - Efficient air conditioning appliances (M4. Air conditioning)</p>	<p>A stakeholder suggested including requirements for appliances with an output (cooling power) greater than 12 kW.</p>	<p>Accepted (See section 3.7.3)</p>
	<p><i>Suggested rewording</i> <i>Criterion 4 - Efficient household air conditioning appliances</i> Any household air conditioner bought <i>installed</i> within the duration of the EU Ecolabel license 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 with regard to energy labelling of air conditioners or have corresponding energy efficiency (for non EU applicants) that means that it shall at least respect the <i>requisites necessary for the award of the relevant energy classes in the table below).</i> <i>The license holder should have to inform the CB about the new installation....</i></p>	<p>Partially accepted Wording and suggestions have been considered to reword the criterion.(See section 3.2.2)</p>
<p>Criterion 5 - Energy performance internal audits for buildings (M5. Energy efficiency of buildings)</p>	<p>Although it was understood that external audits are expensive and not are feasible for mandatory criteria, several stakeholders mentioned that the proposed internal audit is very technical and it would be difficult to be carry out by applicants. It was suggested by several stakeholders to reword it to consist in few bullet points of the standards mentioned in the proposed criterion able to be implemented by applicants. In addition it was suggested to carry out just one audit every 3 or 4 years instead of annual audit. A stakeholder mentioned that they use software to carry out the audit and that it is better to have a sustainable development plan than an annual internal audit. A CB expressed that it would be good to have an audit at the beginning of the award period and a continuous action plan for reduction that applicants should follow up and to report to CBs periodically.</p>	<p>Accepted The internal audit is suggested to be included as part of the environmental policy and plan criterion. This criterion will be reintroduced with a more comprehensive approach to form the basis of an environmental management system (EMS) including an internal audit which is not as technical as proposed in the second criteria version. Instead the internal audit will be an internal control process linked to the environmental policy and targets set in the plan. (See section 3.1.1)</p>
	<p><i>We find the proposal rather excessive and deterrent for potential applicants– based on opinions and experiences of our holders we are convinced the potential benefits don't correspond to the effort and costs needed for its implementation and management, especially at SMEs and hotels in historical buildings. Moreover, the energy savings are tackled in several other criteria, including the one on environmental programme (issue 3 above). It would be quite sufficient if the holders were required to perform such a check only every time when the criteria are revised and proved in the meantime, that they have (some kind of) a plan to improve the energy efficiency of their premises.</i></p>	
	<p><i>We think it is sufficient if the energy audit is performed at the time of application and renewal of the license.</i></p>	

	<p><i>In general we support the suggestion of requiring an (internal) energy performance audit instead of the former requirement of an energy certification or an energy audit performed by an independent expert. But as the majority of tourist accommodation in Europe are SME or even micro enterprises and the personal and financial resources of these enterprise are limited, an annual energy performance audit might be too demanding. TA are obliged to monitor data on energy consumption at least annually and shall react when they notice relevant increases in energy consumption. For us as Competent Body it is also not possible to verify compliance with this criterion annually and dealing with e.g. one missing internal audit at the recertification seems also complicated. We therefore suggest to require the internal energy audit not annually but with every follow up audit (that shall be done usually every four years).</i></p>	
	<p><i>The proposal is unsuitable for TAS which are not of the obligation of energy audit (less of 250 people or less of 50 million of turnover)</i></p> <p><i>The energy audit (EN 16247) is a technical audit, which calls on to skills and which can require the use of special equipments (thermal camera, ammeter, wattmeter, voltmeter, equipments of measure of the temperatures and the flows of ventilation, analyzer of combustion). It is not thus an audit which can be carried by an employee of the TAS or by all auditors.</i></p> <p><i>As for the annual frequency, it not suitable. It can be complicated for a TAS to implement every year new actions of energy efficiency as the TAS is in a new place, renovated or old. Some investments can be heavy (for example change a boiler) or on the contrary to change 3 bulbs...</i></p> <p><i>A follow-up of the consumptions and the improvement of the management of equipments seem more realistic and could ameliorate things.</i></p>	
	<p><i>An internal annual energy audit is a big effort for the tourist accommodations. They are anyway obliged to monitor data on overall energy consumption on an annually interval and getting concerned therefore for dramatic increases in energy consumption and draw consequences from the results where needed. To go deeper in this issue an energy audit every three years will be sufficient. I suggest an internal energy audit with an interval according to the period of re-auditing the EU-Ecolabel, every 4 years.</i></p>	
	<p><i>As written in the Minutes, I'd be strongly against this criterion as it's worded on the proposal! This document doesn't have any sense for a little campsite or hotel and moreover, we don't have the labour-force to realize such a huge work on our buildings. I'm clearly in favour of more stringency on the theme of building efficiency but it's not the best solution!</i></p>	
	<p><i>None of the business owners we are working with is able to do an audit following these standards. This criterion is too ambitious and will be too difficult to achieve.</i></p>	
	<p><i>Add: "or, have certified Energy management system."</i></p>	<p>Accepted (See section 3.1.1)</p>
	<p><i>This criterion refers to the management system of the accommodation (better dealt with by EMAS). Moreover it results in an excessive burden for the accommodation. Thus it should be deleted.</i></p>	<p>Rejected There is a general agreement on the importance of Environmental Management Systems to allow a continuous environmental improvement. (See section 3.1.1)</p>
<p>Criterion 6 - Automatic switching of</p>	<p>Suggested rewording <i>Criterion 6 - Automatic switching-off of eff heating or and air conditioning systems Individual Heating/air conditioning systems installed within the duration of the EU Ecolabel license acquired after the award of the EU Ecolabel shall be equipped with an automatic switch off when</i></p>	<p>Partially accepted Wording and suggestions have been considered to reword the criterion. (See section 3.2.4)</p>

<p>heating and air conditioning systems (M7. Switching off heating or air conditioning)</p>	<p>windows are opened. <i>The license holder should have to inform the CB about the new installation.</i></p>	
<p>Criterion 7 - Automatic switching off lights (M8. Switching off lights)</p>	<p>A stakeholder welcomed the change to oblige to install automatic systems for renovations while a CB see a problem on verifying this after the award.</p>	<p>Partially accepted For all criteria applying to new acquisitions, a text has been introduced to specify that applicant shall inform CBs about the acquisition and provide the relevant documentation at this stage.</p>
	<p><i>The part of information to guest is missing – now the criterion is only for new and renovated rooms.</i></p>	<p>All requirements related to information have been included in the information criteria.</p>
	<p><i>Suggested rewording</i> Criterion 7 - Automatic switching-off lights <i>New wiring systems installed within the duration of the EU Ecolabel license shall include automatic systems which turn the lights off when guests leave the room.</i> <i>The license holder should have to inform the CB about the new installation.</i> Automatic systems, which turn the lights off when guests leave the room, shall be installed in new or renovated rental accommodations/guest rooms ...</p>	<p>Partially accepted For all criteria applying to new acquisitions, a text has been introduced to specify that applicant shall inform CBs about the acquisition and provide the relevant documentation at this stage.</p>
<p>Criterion 8 - Energy efficient light bulbs (M9. Energy efficient light bulbs)</p>	<p>There were divided views. While several stakeholders do not see a problem in complying with this criterion (they even mentioned they have a well return of the investments made), other stakeholders have problem implementing this criterion especially in big hotels, however they welcomed the phase in period for this criterion.</p>	<p>Accepted The criterion and phase in period approach are suggested to be kept.(See section 3.2.3)</p>
	<p><i>Why not LED instead of energy-saving light bulbs which contains mercury – possibility for breach on the light bulb when thrown in the bin?</i> <i>Expensive to change all light bulbs.</i> <i>Practically a challenge due to old lamps might not fit in new light bulbs.</i> <i>Design: First look at color, secondly look at temperature and finally look at LED, when hotel looks into purchase of new light bulbs/lamps.</i> <i>How is criterion interpreted/documented in regard of the last sentence in the criterion: "The targets above do not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs." If 30% of the fittings can not contain an energy-saving light bulb, should the percentage of the rest which can contain a energy-saving light bulb then document to have 40% or should the 40% be of the total fittings?</i> <i>Proposal: Since the design will have a very high priority it might be usefull to divide the areas in the hotel after functional areas; common areas, rooms, lobby, kitchen, working areas and make criterion for each – including different limits!</i> <i>Example: Shift of 30.000 light bulbs out with energysaving light bulbs has earned itself in – in two years in energy saving!</i></p>	<p>Partially accepted The 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. Clarification is made as follow: <i>Note: Percentages are set in reference to the total amount of lighting suitable to use energy-saving lighting. Percentages are referred to the total .(See section 3.2.3)</i></p>
	<p><i>We welcome the criterion to require a minimum rate of energy efficient light bulbs. However we rather suggest to raise the ambition level and propose to request higher percentages for year 1 (at</i></p>	<p>Partially accepted Several stakeholders mentioned difficulties in complying with this</p>

	<p>least 50 % / 60 %, instead of 40%/50%).</p>	<p>criterion. In addition the waste from lamps replacement should be avoided. However it is suggested require the first requirement (40%) on application instead that 1 year after.(See section 3.2.3)</p>
	<p>We are happy with the new wording of the criteria. We think that it is important to give a transitional period of time to accommodations to change the light bulbs. On the other hand, we think that it would be better to require 40% of the light bulbs Class A when company does the EU Ecolabel application, instead that 1 year after. On this way, Competent Bodies only should to do an extra verification 2 years from the date of the EU Ecolabel licence award.</p>	<p>Accepted (See section 3.2.3)</p>
	<p>Suggested rewording Criterion 8 - Energy efficient light bulbs At least 80% of all light bulbs in the accommodation premises shall be "energy saving" light bulbs. 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. 100% light bulbs that are purchased within the duration of the EU Ecolabel license shall have class A as defined in Commission Delegated Regulation (EU) No 874/2012. The license holder should have to inform the CB about the new installation. The criterion does not apply to light fittings whose physical characteristics do not allow use of energy-saving 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 applicant shall provide a declaration of compliance with the criterion describing the total amount of different kind of lamps in place, operating hours / per zone, together with the supporting documentation. Explanation must be given about the impossibility to substitute light bulbs where physical characteristics do not allow use of energy-saving light bulbs. The applicant shall. The physical characteristics which may prevent the use of energy efficient light bulbs may include: decorative lighting requiring specialised light bulbs; antique light fittings; 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. The applicant shall also provide the invoices referring to the light bulbs purchased within the duration of the EU Ecolabel License. Assessment and verification: The tourist accommodation shall provide to the competent body a two</p>	<p>Rejected The less efficient LED lamps fall within the energy class B. Although energy saving lamps are somehow easy to be recognised, there should be some of them falling within the low energy class categories. It is relevant to request a specific energy class instead that generally ask for energy saving lamps. The information from the packaging of the purchased lamps purchases could be used as a means of verification</p>

	<p>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.</p> <p>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.</p> <p><u>Comment:</u> energy saving light bulbs are widely diffused. It is quite impossible to know the energy class of light bulbs in place while it is very easy to know if they are "energy saving" ones.</p>	
<p>Criterion 9 - Outside heating appliances (M10. Outside heating appliances)</p>	<p>Could we modify the criterion on exterior heating on "Exterior heating and air conditioning devices..."</p> <p>Does not make sence to ban for the nordic countries: Often are guests in a hotel acoomodation away from the outerwear when stepping outside for a cigarette! In the Nordic region this might be cold. Has it been considered to pospose that there should be a automatic switc on/of on the heating appliances? What type of heating appliances whould be preffered from an environmental point of view – Gas, Electricity – other? The possibility of using the heating appliances in Denmark can be crucial for the business in the spring/fall season to get more customers also in no room inside for eating in restaurant. Consider foreclosure of areas where the heating appliances is placed with parasol above? Consider kWh as a parameter for usage instead of banning use of the heating appliance? Conclusion: A ban will destroy business if not allowed to be used – might be a show stopper for applicants.</p> <p>Finland Appliances powered with renewable energy sources to heat outside areas such as dining/drinking areas should be allowed.</p> <p>We propose to put this criterion optional, we believe that mandatory criteria should be for the main environmental issues.</p> <p>Suggested rewording 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. No outside heating appliances shall be used by the accommodation service other than those completely powered by wind, solar, aerothermal, geothermal, hydrothermal and ocean energy. The applicant shall turn on these appliances only when effectively useful. Assessment and verification: The applicant shall provide documentation indicating energy sources used in these appliances <u>Comment:</u> outside heating appliances have to be intended as an additional benefit to guests (e. g. like wellness areas) and/or to increase the use of outdoor areas when the inside ones are small.</p>	<p>Rejected</p> <p>In first version of the report 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. 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.</p> <p>It is suggested to maintain the complete banning of such appliances.</p>

	<p><i>We reject this criterion on Outside heating appliances and therefore strongly support the option 2 which is to ban any outside heating appliances.</i></p> <p><i>Outside heating appliances are a wasteful use of energy.</i></p> <p><i>In addition, we do not think that heated open spaces are among the main expectations of consumers when they go to ecolabelled facilities. This would undermine the “green” image of the accommodation and give contradictory signals to consumers, as these practices are not in line with the EU Ecolabel objectives.</i></p>	<p>Accepted (See section 3.2.5)</p>
	<p><i>Could you please add to the criterion the interdiction of outside A/C?</i></p>	<p>Accepted (See section 3.2.5)</p>
<p>Criterion 10 - Water flow from taps and showers (M11. Water flow from taps and showers)</p>	<p><i>We are not in favour of decreasing the limits with every revision of criteria. Especially for existing licence holders it might be confusing to have new standards, where the difference of the former requirement to the new one is not really relevant anymore but might lead to unnecessary additional efforts and costs with limited effects. Thus at least an additional requirement concerning already certified accommodation businesses shall be included (as suggested already at the 1st AHWG), e.g. to require the higher limits for new taps and shower heads bought within the duration of the EU ecolabel.</i></p> <p><i>According to our experience the (former) required 9 l/min are sufficient from an ecological point of view as well as from the guests comfort view and with regard to the demand of the public sewer system.</i></p>	<p>Partially accepted</p> <p>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 (9l/min) recognising that there is a room for improvement as indicated by benchmarks but recognising the mandatory character of the criterion.. In addition, it has been added a sentence Without prejudice of the local or national regulation on water flow rate from bathroom taps and showers, with the aim to recognise that in certain areas there might be legislation concerning this to avoid sewage malfunctioning. (See section 3.3.1)</p>
	<p><i>We propose to keep the limit of 9 litres/minute for shower heads according with the best environmental products available in the market.</i></p> <p><i>Be careful, pressure must be important for the outbreak of the individual gas heating. We should leave 9 litres for gas heating.</i></p>	
	<p><i>Consider differentiation on levels for liters/min for common areas – and rooms! The limit can be lower in common areas and this will have a good impact.</i></p>	<p>Accepted (See section 3.3.1)</p>
	<p><i>We welcome the recent adjustments, we find the proposal balanced, feasible but with no space for further lowering of water flow limit.</i></p>	
<p>Criterion 11 - Wastewater management (M12. Waste bins in toilets&M15. Correct wastewater disposal)</p>	<p><i>This criterion does not function! It is impossible for CB’s and applicants to demonstrate compliance with the ground water directive.</i></p>	<p>Accepted</p> <p>Regarding the impracticalities associated to this criterion it is proposed to be removed. However the criterion reference to containers for dispose of toiletries is introduced in the criterion waste sorting (See section3.4.3) and information on the correct wastewater disposal has been included in information to guests (See section 3.1.3).</p>
	<p><i>Having a list of substances that shall not be disposed of with the waste water is not applicable in hotels since it does not look good in terms of the interior design, it does not make sense since guests do not use chemicals which are harming the aquatic environment in a hotelroom nor on a camping site!</i></p>	
	<p><i>As it is not practical to provide “a general list of substances that shall not be disposed of with the waste water according to the Groundwater Directive” to guests we suggest to reword this criterion and ask guests not to dispose any waste into the toilets. This requirement could also be included into the general criterion on guest information.</i></p>	
	<p><i>Our opinion is that General list of substances should be obligation for staff only, if any, not for the guests. It is not likely that guests will have noxious substances along, and we should avoid too many infos and instructions all around the property. The first proposal is good enough.</i></p> <p><i>Delete it. The content of this criterion is already covered by the laws. The part of the criterion referring to bins in toilets has been moved to waste separated collection criterion and the part referring to information to guests and staff to relevant criteria</i></p>	

<p>Criterion 12 - WC and urinal flushing (M13. Urinal flushing & O54. WC flushing)</p>	<p>Consider to make this a improvement criterion, instead of a maximum amount of litres per full flush – get points if existing urinals do not have flushing with water and/or that urinals are shifted into ones without water withing a giving amount of time! Do not use water at all, less cleaning chemicals.</p> <p>6 litres per full flush is too restrictive. It's better to leave the optional criteria "54" WC flushing. Moreover, we underline that France voted negatively on Decision "flushing toilets and urinals" (2013/641/UE), for the following main reason: The French Technical Center 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. 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. Consequently, the criteria document as it is now could not be used by public purchaser in France.</p>	<p>Partially accepted</p> <p>It is proposed that the limit is relaxed to 7L and only that applies to 70% of toilets to allow a progressive modification of flushes. In addition, it has been added a sentence Without prejudice of the local or national regulation on water flow rate from bathroom taps and showers, with the aim to recognise that in certain areas there might be legislation concerning this to avoid sewage malfunctioning. (See section 3.3.2)</p>
<p>Criterion 13 - Changing towels and sheets (M14. Changing towels and sheets)</p>	<p>Several stakeholders mentioned that it should be according to the internal policy as there is no local regulation concerning this. In addition, they mentioned that towels could be put on the floor to indicate that clients want to change them; however this could not be done with the sheets. Another stakeholder supported to set the frequency in the internal policy as there are guest that may stay in the apartment for 3 or 4 weeks.</p> <p>The old wording was better; please also refer to stakeholders comments.</p> <p>Setting up of a communication procedure for guests request for change of towels is impossible. If they lay them on the floor ok! Some guests would like to have the towels changed everyday since they have paid for their stay and want the luxury of having new towels everyday! Not many guests wants to have their towel changed every day!</p> <p>It's better to ask the TAS to have an environmental policy for that point, because for some types of TAS there is no national regulation or third party certification that define it</p> <p>When I read the criterion...If a customer on a campsite stays for 3 weeks... and if I have no third-party requirement...I shouldn't change the sheets...That could be a little bit difficult to wash it without bleach when people sleep and sweat for 3 week ;)</p> <p>Suggested rewording Criterion 13 - Changing towels and sheets The accommodation service shall change sheets and towels by default at the frequency established by its environmental policy or requested by law and/or national regulations or established by a third party certification scheme the accommodation service is participating in. More frequent changes must be explicitly requested by guests. 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 accommodation service 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 by the accommodation service, or by the third party certification or by law and/or national regulations.</p>	<p>Partially accepted</p> <p>It is proposed to keep the current criterion with the aim to encourage guests to re-use towels and bin liners. However the text related to guest/staff information continue to be suggested to be included in mandatory criteria for staff training and information to guests.</p> <p>The wording has been further clarified. to specify that the frequency for change sheets and towels shall be in accordance to its environmental action programme, specifying that the frequency should be lower to everyday unless requested by law and/or national regulations or established by a third party certification or 'specifically' requested. (See section 3.3.3)</p>
<p>Criterion 14 -</p>	<p>Suggested to be deleted. Comment: in Italy and presumably in all other European Countries the whole</p>	<p>Accepted</p>

Chemical toilet disposal point (M16. Disposal Point (CSS))	<i>matter is regulated by the local and national laws.</i>	This criterion was mainly addressing legal requirements on waste water disposal. The criterion is suggested to be removed. Instead, it has been included a reference to this in the legal pre-requisites section. (See section 2)
Criterion 15 - Waste separation (M18. Waste separation by guests &M19. Waste separation)	<p>A stakeholder suggested to focus on the information to guests as the collection should be according to legislation and there is no more that the ecolabel could do in this sense. Another stakeholder mentioned that one central container accessible to guests instead on having in every floor should be sufficient.</p> <p><i>Separations shall be possible at the room – not an alternative to separate on the floor.</i></p> <p><i>The relevant topics of this criterion are, that waste is separated correctly and according to the local facilities and guests are informed and given the possibility to separate their own waste. According to our experience the provision of containers for waste separation in rooms or on each floor is not always the best way to achieve those goals. Sometimes waste separation by staff can be facilitated, if guests are informed and invited e.g. to leave waste that can be separated at a special place in the room. It shall be sufficient also for tourist accommodation if there is a container for waste separation at a central point of the accommodation, where get the notice of the possibility to separate waste, together with adequate information about the way to support the staff with separating waste.</i></p>	<p>Accepted</p> <p>Information to be provided to guest and training staff covers waste separation.</p> <p>The possibility to allocate in the rooms, floor or blocks is provided to allow flexibility considering the different type and sizes of accommodations.</p>
Criterion 15 - Waste separation (M18. Waste separation by guests &M19. Waste separation)	<p>Suggested rewording</p> <p><i>Criterion 15 - Waste separation</i></p> <p><i>(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 or block of the tourist accommodation service premises. In the case of camp sites, a container should be available at least at a single central point on the site.</i></p> <p><i>Each toilet / sanitary areas 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.</i></p> <p><i>(b) Waste shall be separated into the categories by the tourist accommodation service 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.</i></p> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion and relevant documentation, together with an indication of the different categories of waste accepted by the local authorities, and/or relevant contracts with public/private agencies organizations charged of the waste collection.</i></p> <p><i>Comment: the part of the criterion referring to bins in toilets has been moved here from criterion 11.</i></p>	<p>Partially accepted</p> <p>The text with regard to the toilet bins has not been specified as the text is considered to be comprehensive to cover all type of containers. In addition, toilet bins or hygienic bags are widely extended as a common practice in hotels. However, a reference has been added in the requirement b) in order to have special attention to toiletries items (See section 3.4.3) and mention to items that shall not be disposed of with the waste water is made at the information to guests criterion.(See section 3.1.3)</p>

Criterion 16 - Single-use products (M20. Disposable products)	<p><i>First, there is the issue of single-use products (Criterion 16, 17, 55; 22, 23) – mostly made of plastic – e.g. drink containers, cups, and glasses, plates and cutlery, disposable and single portion products, toiletries, and packaging in general.</i></p> <p><i>Due to a knee-jerk reflex to create less waste, these disposable products are heavily focused on and subsequently discriminated, without any scientific proof that reusable products actually perform better in terms of energy demand, greenhouse effect, or any other environmental impacts.</i></p> <p><i>Without such a proof, disposable products should be allowed as any reusable products.</i></p> <p><i>Also, such discrimination is not in line with recent scientific publications and comparative life cycle assessments showing that e.g. single-use cups may have indeed a lower environmental impact than reusable products</i></p>	<p>Rejected</p> <p>BEMP guidance highlights the importance of waste prevention, and suggests 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.”</p>
	<p><i>It is our opinion that recycling of single-use items should not be arranged by service provider exclusively, but that service provider can send waste to be recycled elsewhere.</i></p>	<p>Accepted</p> <p>(See section 3.4.2)</p>
	<p><i>We agree with the JRC proposal to limit the use of single-use products. However, we propose to replace the current wording with the following one:</i></p> <p><i>“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 became a member of prior to the awarding of the EU Ecolabel licence.” The EEB and BEUC hold the view that there should be no obligation for service providers to proactively hand-out single-use products such as shower caps, brushes, nail files to guests. In case any obligations exists because of national legislation or because of an additional label which the service provider holds in addition to the Ecolabel, it should only be indicated to the consumer that such items are available on request.</i></p>	<p>Rejected</p> <p>It is suggested to leave the option to guests to request the toiletries if they need them in order to meet their expectations.</p>
	<p><i>Some would say that it’s not necessary to speak about beddings but it’s VERY important for me to be allowed to use it because on campsites... people sweat a lot with the heat ... So we need to protect our mattresses a little bit and washing beddings every week (150 check/out is too stringent in high season) that with it’s to my opinion important to speak about it and to avoid 100%-single-use pdts</i></p>	<p>Accepted</p> <p>(See section 3.4.2)</p>
	<p><i>We strongly support this new wording of this criterion.</i></p>	<p>Accepted</p> <p>(See section 3.4.2)</p>
	<p>Suggested rewording</p> <p><i>Criterion 16 - Single-use products</i></p> <p><i>(a) Single-use/ personal-use products such as shower caps, brushes, nail files, shampoos, soaps etc. shall not be available to guests in rooms.</i></p> <p><i>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.</i></p> <p><i>(b) 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.</i></p> <p><i>(c) Single-use towels and disposable bedding shall not be available to guests in rooms, unless the items are recycled by the service provider.</i></p> <p>All the 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 accommodation service is a member of. If so these items should be made of renewable/recycled raw materials and be biodegradable and compostable according to EN 13432. The accommodation service should collect all these items and deliver them directly or through a waste management</p>	<p>Partially accepted</p> <p>Suggestions on the wording have been considered. Reference to renewable/recycled raw materials and be biodegradable and compostable has been deleted as these materials are not better per se unless they are linked to a post treatment step. In contrast reference to the need of recycling activities for the used item is introduced. (See section 3.4.2)</p>

	<p>company to a recycling plant. (d) Shampoos, soaps, handkerchiefs, etc. shall be provided in rooms / bathrooms /sanitary areas only by refillable dispensers.</p> <p>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 / personal-use products the tourism accommodation service was is a member of prior to the awarding of the EU Ecolabel licence), and documentation explaining to guests why disposable products are not provided and about the refillable products and systems supplied.</p> <p>Comments: it doesn't appear significant the reference to a certification scheme membership acquired prior to the awarding of EU ecolabel license. The part of the assessment and verification referring to documentation explaining to guests why disposable products are not provided and about the refillable products and systems supplied should be included in the criterion on information</p>	
<p>Criterion 17 - Food service waste management (M21. Breakfast packaging)</p>	<p>Several stakeholders welcomed the idea of managing food-packaging waste as the organic waste is one of the hotspots identified. However the wording is felt to be difficult to be verified. A stakeholder mentioned that in certain countries there is restrictive legislation in relation to breakfast products in hoteliers sector and this must be considered. A CB suggested to better specify if the criteria applies to vending machines, as there are machines offering certain food products. A stakeholder suggested adapting the criterion for vending machines.</p> <p><i>The intention of these criteria needs to be reconsidered. Now there are so many possible derogation that all most all will be permitted. We want to limit the amount of packaging waste and also the amount of food waste – but I do not think the draft proposal will achieve this.</i></p> <p><i>OK for the new proposal, it's better approach for the TAS. But, we should clarify for vending machines. Because in that proposal the vending machines are not accepted (soups, prepared dishes/ready meals, biscuits, drinks...). If there is no restaurant the vending machines are a service for the guests.</i></p> <p><i>We strongly support this new wording of this criterion.</i></p> <p>Suggested rewording 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 tourism accommodation service shall manage the provision of food to guests to minimise both food and packaging waste. To achieve this, the tourism accommodation service shall follow a documented procedure which specifies how the food waste/packaging waste balance is optimised, dependent on the offer of the tourist accommodation service based on the number of guests (that means that single dose perishable food items may be offered only if the number of guests booked/estimated doesn't allow food waste minimization).</p> <p><i>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 food stuffs that are sold only in single dose packaging.</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</i></p>	<p>Partially accepted</p> <p>It is proposed to keep the proposed criterion. However a further specification on the text has been introduced to better reflect the aim of each requirement. In order to reduce the complexity concerning assessment and verification, indicative examples of non-perishable or long life food products and perishable foods have been introduced.(See section 3.4.1)</p>

	<p>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. Data on booking should be provided if relevant. Any legislation requiring the use of single dose products shall also be provided. Comments: exemption for dairy fat spreads (such as butter, margarine and soft cheese), chocolate and peanut butter spreads is not needed since they are perishable food and then the accommodation service may demonstrate the possible need to use them in single dose packages. The phrase "dependent on the offer of the tourist accommodation service" seems to be not significant</p>	
	<p>☒Single-dose packages (Criterion 17, 55) often prove to be the more eco-efficient alternative in comparison to reusable packaging. The main arguments justifying the use of single-dose packages are hygiene, (food) safety, resource savings (less content loss), lower energy consumption at the production, and finally practicability by the applicant. For these reasons, we ask to remove every general recommendation to avoid disposable products, and any concrete discrimination of disposable products, since such an approach is not based on science, too generic, and in contradiction with recent findings.</p>	<p>Rejected BEMP guidance highlights the importance of waste prevention, and suggests 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."</p>
<p>Criterion 18 - No smoking in common areas (M22. No smoking in common areas)</p>	<p>A&V (e. g. copy of signs hung inside the accommodation service premises, map showing the places where signs are hung).</p>	<p>Accepted Wording and suggestions have been considered to reword the criterion.(See section 3.5.1)</p>
<p>Criterion 19 - Environmentally preferable means of transport (M23. Public transportation)</p>	<p>A CB suggested focusing on practical information in relation to the public transportation available. A stakeholder mentioned that sites offering and using electric cars should be awarded. If only theoretical information this will not change anything. The intention should be to inform guest on how to arrive at the hotel by public transport, or use public transport when visiting the area.</p> <p>Suggested to be deleted. Comments: With the aim to make this Decision more friendly since this criterion refers only to information it should be included in the criterion specifically dedicated to that.</p>	<p>Accepted Clarified to refer to practical information(See section3.5.2)</p> <p>Rejected It is relevant environmental aspect. •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. (See section3.5.2)</p>
<p>M20 - Fundamental principles and</p>	<p>The assessment and verification shall be discussed. Is this possible for CB's to verify in a creatable way? Normally an audit at a hotel takes ½ a day and is arranged beforehand. How do we ensure that we have the possibility to talk to all relevant employees? And are CB's competent to do this or shall we instead depend on a 3rd party verification as for textiles?</p>	<p>Partially accepted Approach for social requirements: <u>Legal prerequisites section</u></p>

<p>rights at work</p>	<p><i>We agree provided the criteria will be verifiable by CBs, with the experience of other schemes taken into account. Checking working contracts and payment slips etc. goes clearly beyond the acceptable level. It is something the government authorities should inspect.</i></p> <p><i>It is important to set criteria for this area, even proven difficult. But we also have to face that the market situation is very different and this area is differently regulated in the member states. The ambition level should reflect this – simple requirement like employment contracts where issues like salary and overtime are described.</i></p> <p><i>We support the development of a new criterion on Fundamental principles and rights at work as the EU Ecolabel has to take also social considerations into account. We welcome the criterion aiming at restricting child labour and commercial exploitation, ensuring equal employment opportunities and fair employment practices. Given the high importance of social concerns in the tourism sector related to workers and employees, BEUC and EEB hold the views that social requirements should be maintained AND made obligatory in the criteria set.</i></p> <p><i>We suggest making explicitly reference to International Labour Organisation (ILO) conventions and other United Nations Standards by keeping the current statement at the beginning of the criterion: “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.”</i></p> <p><i>We also suggest completing the draft criterion by adding the following provisions (in bold):</i></p> <p><i>“The accommodation offers equal employment opportunities and working conditions to women, local minorities and others, including in management positions, while restraining excluding child labour.”</i></p> <p><i>This provision would comprise e.g same wages for women and men, as we know this is a critical and recurrent problem in the tourism sector.</i></p> <p><i>Finally, we recommend adding the following concrete list of ILO regulations in the Annex of the EU Ecolabel criteria legal text. This list can be found in the draft criteria for Footwear published in May 2015:</i></p> <p><i>Fundamental conventions of the ILO:</i></p> <p><i>(i) Child Labour:</i></p> <ul style="list-style-type: none"> - Minimum Age Convention, 1973 (No. 138) - Worst Forms of Child Labour Convention, 1999 (No. 182) <p><i>(ii) Forced and Compulsory Labour:</i></p> <ul style="list-style-type: none"> - Forced Labour Convention, 1930 (No. 29) and 2014 Protocol to the Forced labour Convention - Abolition of Forced Labour Convention, 1957 (No. 105) <p><i>(iii) Freedom of Association and Right to Collective Bargaining:</i></p> <ul style="list-style-type: none"> - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) - Right to Organise and Collective Bargaining Convention, 1949 (No. 98) <p><i>(iv) Discrimination:</i></p> <ul style="list-style-type: none"> - Equal Remuneration Convention, 1951 (No. 100) - Discrimination (Employment and Occupation) Convention, 1958 (No. 111) <p><i>Supplementary provisions:</i></p> <p><i>(v) Working Hours:</i></p> <ul style="list-style-type: none"> - ILO Hours of Work (Industry) Convention, 1919 (No. 1) <p><i>(vi) Remuneration:</i></p> <ul style="list-style-type: none"> - ILO Minimum Wage Fixing Convention, 1970 (No. 131) - Living wage: <i>The applicant shall ensure that wages paid for a normal work week shall always meet</i> 	<p>The legal prerequisite in the current criteria set already state the following: <i>The enterprise is operational and registered, as required by national and/or local laws and its staff are legally employed and insured.</i></p> <p>The text is suggested to be further specified by introducing specifications provided within the Sustainable Restoration scheme as suggested by stakeholders, which baseline criteria are written contract, minimum legal wage and working hours in accordance with the national law.</p> <p>In addition examples of documentary evidence that applicants could provide to show compliance is further specified. Furthermore, it is suggested to include the possibility to allow Competent Body that considers relevant to have a higher degree of assurance performing random interview during the on-site visit. (See section 2)</p> <p>Optional criterion on social policy</p> <p>The optional criterion is partially aligned to Sustainable Restoration scheme and to several suggestions made by stakeholders. This optional criterion is therefore focused on awarding points to social actions going beyond the legal labour requirements. This proposal was shared among some licence holders and one CB who agreed on its approach and content. For this optional criterion, there are two levels of assurance in the verification process proposed for this criterion. The first level is mandatory and consists of a declaration including social policy dated and signed by staff. The second level comprises the possibility of the CB requesting additional documents and/or interviews to staff during the on-site visit, if it is considered necessary. (See section 3.10.2)</p>
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	<p>at least legal or industry minimum standards, are sufficient to meet the basic needs of personnel and provide some discretionary income. Implementation shall be audited with reference to the SA8000 13 guidance on "Remuneration";</p> <p>(vii) Health & Safety</p> <ul style="list-style-type: none"> - ILO Safety in the use of chemicals at work Convention, 1981 (No.170) - ILO Occupational Safety and Health Convention, 1990 (No.155) <p>On the assessment and verification, we agree that the applicant shall show documentary evidence and inform the staff and customers about the different policies. Information to the staff is crucial as very often staff working in the tourism sector – especially foreigners seasonal workers, are not always well informed about their rights when those are country-specific. Informing them about rights and policies would put enough pressure on the employers to fulfil them.</p>	
	<p>As far as the social aspects in the Tourist accommodation criteria are concerned, please take into consideration that there must be a definitive clause for legal employment. That can only be verified by official documentation/register recording the names and no. of employees by the local Government's Employment Inspectorate or Agent.</p>	<p>Partially Accepted This option has been included. (See section 2)</p>
	<p>Since you have enlarged the scope of Ecolabel with labour regulations we think that other social subject should be included too. This would bring Ecolabel closer to the definition of sustainable tourism. In particular we should address: children protection policy and staff training and social responsibility policy, objectives and yearly reporting.</p>	
	<p>We don't agree with the actual proposal. This criterion is not easy/possible to check by a CB auditor. And we don't think it's legal to do it in France. 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 TAS. We are in favour of a new optional criterion on social actions carried by the TAS in favour of his staff, as we suggested.</p> <p>Example : social action to improve wellness at work</p> <ul style="list-style-type: none"> ü The hotel can give a bonus to a person which reduces the waste of the breakfast buffet. ü Help of the manager to fill the file of loan for the bank with the aim of a real estate purchase for the employee. ü Implementation of a shuttle in late hours for the travel of staff <p>The idea is to introduce a social criterion and/or some optional social criteria. And at least to have one optional criterion "Additional social actions" that could promote social actions conducted by TAS. Some of these actions may be retained for future social criteria at the next revision.</p>	<p>Partially Accepted See the approach above.</p>
	<p>To my opinion it's too difficult to ask a CB to inspect this criterion: they need to have a specific training... and as the law can be very complicated. Moreover, it's hard to ask a TAS or CSS to be inspected by a third part because even if the TAS feel quite OK with the local law, a specialist in law would ever find a discussion point which would be quite hard to set up. In fact, I'm clearly in favour of having social criteria but the idea of having a legal control on an environmental scheme doesn't make me feel comfortable... Speaking of social criteria, I'd be in favour of having ideas on transportation for workers, policies for tips (which are quite an issue on certain countries...). I'd be strongly against a "general criterion" like this</p>	
	<p>This criterion seems difficult to audit because competent bodies do not have the competences to check if the accommodation is OK. We would recommend to add a larger criterion to reward all the good social/societal initiatives.</p>	

	<p><i>CB are not competent to verify such requirements. Then we have to invite social experts to site visit, but it means higher prices/cost for applicants.</i></p> <p><i>We propose to delete this criterion. It is an environmental label and we do not think that we are legitimate to ask for personal labour data as salaries. In any case, if this criteria is kept it would be necessary specify in the Decision Commission exactly which documents have to provide applicants in order to justify this criterion.</i></p> <p><i>It is important to set a criterion for this area but the requirement should not be too complex in order to be verifiable by CBs. A simple requirement could be for example : employment contracts where issues like salary and overtime are described.</i></p> <p><i>Comments: the compliance with the Fundamental principles and rights at work must be a pre-requisite for the EU Ecolabel application. This criterion has been moved to the pre-requisite section at the beginning of this document</i></p>	
	<p><i>Mandatory criteria</i></p> <p><i>Social</i> <i>The structure will treats it staff fairly.</i> <i>A written document will detail the social policy. It will necessarily include the engagement</i></p> <ul style="list-style-type: none"> - <i>to respect at least the legal minimum required</i> - <i>to give back entirely the tips back to the staff indicating the sharing policy</i> <p><i>Proof = written document in the staff zone and welcome document</i></p> <p>1) SOCIAL</p> <p><i>This policy will be signed by every staff every year during the annual individual interview or the annual social and security meeting.</i></p> <ul style="list-style-type: none"> • <i>Written grievance/ disciplinary processes/ info on what happens to service charges & tips from guests (proof = the written document s)</i> <p><i>Staff Fair treatment</i></p> <ul style="list-style-type: none"> • <i>Free meal per shift (proof = written in a benefits document provided to new starters and in the staff room)</i> • <i>Training offered e.g. induction, general, role specific, personal development, management, accredited training (that they can put on their CV and take to another job)</i> • <i>Staff recognition scheme - anything you do in house to recognise/ reward great staff (proof = materials/ internal promos from the scheme)</i> • <i>Apprenticeship schemes - official or unofficial (proof = the paperwork you'd need to do anyway to take them on)</i> • <i>paid off time for volunteering,</i> • <i>free workwear,</i> 	<p>Partially accepted</p> <p>The mandatory suggestions are include in the prerequisites (See section 2) and several suggestions for the optional criterion have been also accepted (see section3.10.2)</p>

	<ul style="list-style-type: none"> • supplier visits, • discount on products/ services in the hotel, • subsidised sustainable transport scheme • free or low cost Lodging for trainee, apprentice of seasonal staff • Caution to get house loan <p>☒ Mesures to fight against bullying (sexual and moral) making sure everyone integrity is respected (faute grave)+ contact to call</p> <p>☒ Others</p> <p>2) Social criteria</p> <p><i>In the optional, I would add treating fairly the suppliers (policy to share with suppliers with a proof of them for the local ones we claim to work with) + sharing with consumer the supplier and staff policy. I will send you the detailed supplier suggestions in a second mail. To be noticed, the treating fairly suppliers will be involving for the smallest structures.</i></p>	
Criterion 22 - Staff training (M26. Staff training)	<p><i>In order to make criteria readable (and a little bit more flexible) we and certified accommodations suggest not to formulate all requirements in the minutest details but to leave it with the key requirements: "Staff shall be trained on the EU Ecolabel for tourist accommodation, on how to save energy and water, on how to use chemicals correctly and reasonable, how to reduce and separate waste and to handle single use products." The detailed requirements and suggestions of implementation shall be formulated in the user manual.</i></p>	<p>Accepted</p> <p>Clarified and simplified. The requirements referring to criteria set along the document have been simplified in order to do not repeat information. (See section 3.1.2)</p>
	<p><i>In the current proposal to this criterion referring to guests, staff is mentioned. "Concerning water and waste water": Staff shall be informed that washing sheets..." This sentence is already included in the criterion 26: Staff training. This sentence should be deleted because it does not belong to the information to guests.</i></p>	<p>Rejected</p> <p>It is suggested to keep at least a yearly update as it seems not to be a general concern and it is considered to be more effective.</p>
	<p><i>I like this criterion but it seems to be a little bit stringent... in fact, where people work all day long... it's clear that a training is not really necessary every year... Maybe a smart think could be imagined: each 2 years a training... and each 2 years a meeting with managers to exchange on new environmental opportunities... Linked to the social requirement, it could be a great opportunity to involve people on the Ecolabel scheme !</i></p> <p>Suggested rewording</p> <p><i>"...(c) iii. 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 accommodation service environmental policy or by law and/or national regulations or established by a the third party environmental certification scheme of the tourist accommodation service is participating in or requested by law and/or national regulations.</i></p> <p>...</p>	<p>Rejected</p> <p>Clarified and simplified. The requirements referring to criteria set along the document have been simplified in order to do not repeat information.. (See section 3.1.2)</p>

	<p><i>In order to make criteria readable (and a little bit more flexible) we and certified accommodations suggest not to formulate the "specific actions for the different areas" in the minutest details but to leave it with the key requirements: "Guests shall be informed on the EU Ecolabel criteria for tourist accommodation, on how they can contribute to save energy and water, on how to reduce and separate waste and to handle single use products." The detailed requirements and suggestions of implementation shall be formulated in the user manual.</i></p>	<p>Accepted Clarified and simplified. The requirements referring to criteria set along the document have been simplified in order to do not repeat information. (See section 3.1.3)</p>
	<p><i>We are not sure what the last sentence in the proposal means. If "actively given" means that front agent should give such information verbally by front desk agent at check in or by flyer, we think it is not realistic. Guest at check in expect that the process is done as quickly as possible. Therefore we propose that the sentence is replaced with following one: ← "The information should be easily available to guests in the room and public areas..."</i></p>	<p>Accepted The text has been clarified according to comment. (See section 3.1.3)</p>
<p>Criterion 23 - Information to guests (M27. Information to guests)</p>	<p>Suggested rewording 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 ...[...] (c) Concerning water and waste water: i. In the bathrooms, sanitary areas there shall be adequate information to the guest on how to help the tourist accommodation service to save water, ii. The guest shall be invited to inform the staff of any leak, iii. In the toilets, signs shall request guests to dispose of their waste into the waste bins instead of the toilets. iv. Staff Guests 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 the accommodation service environmental policy or requested by law and/or national regulations or established by a third party certification scheme the accommodation service is participating in. v. 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 vi. indications on water hardness shall be displayed in proximity to sanitary areas/washing machines/dishwashers to allow better use of detergents by guests and staff. (d) Concerning waste: i. The guest shall be informed about the waste reduction policy of the tourist accommodation service and the use of quality product alternatives to disposable single-use and single portion products, and should be encouraged to use non-disposable single-use products, in case where any legislation requires the use of disposable products, ii. 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 service and where to dispose of their hazardous substances. iii. 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. iv. In the toilets, signs shall request guests to dispose of their waste into the waste bins</p>	<p>Partially accepted Several suggestions considered. However the requirements referring to criteria set along the document have been simplified in order to do not repeat information. (See section 3.1.3)</p>

	<p><i>instead of the toilets.</i></p> <p><i>(e) Concerning customer satisfaction:</i></p> <p><i>i. The guests shall be invited to provide feedback concerning all other aspects of the tourist accommodation service (this may be via an online or electronic survey).</i></p> <p><i>(f) Concerning environmentally preferable means of transport</i></p> <p><i>i. Information shall be made available on the website of the accommodation and on-site to the guests and staff on:</i></p> <p><i>(a) Environmentally preferable means of transport available to and from the accommodation service: public transportation, car sharing, bicycles, etc.</i></p> <p><i>If the accommodation service provides bicycles to guests, 'active partnerships' between accommodation service and a bicycle hire company should be visible on site. For example, the accommodation service should be actively promoting the hire company to guests and there should be evidence to show this e.g. promotional information.</i></p> <p><i>(b) Environmentally preferable means of transport available from home to home: train, car sharing, etc.</i></p> <p><i>(g) Concerning environmental communication and education</i></p> <p><i>i. The accommodation service shall provide environmental communication and education notices on local biodiversity, landscape, nature conservation measures to guests</i></p> <p><i>ii The accommodation service shall provide information to guests on local traditions and customs as well as on architectural, historical and artistic sites...</i></p>	
<p>Criterion 24 - Data collection (M28. Energy and water consumption data & M29. Other data collection)</p>	<p><i>In some cases the campsites do not even get a bill with a listing of the quantity of the sorted waste, p.e. in Germany the "yellow bag" for plastic materials/waste, also for glass waste. They have to estimate the quantity. I suggest including "that only valid data on waste should be integrated" in this "Criterion 29 Other data collection" or in the proposed new "Criterion 24 Data collection".</i></p>	<p>Accepted</p> <p>Total waste production monitoring is requested.(See section 3.1.5)</p>
	<p><i>Could you reword le "etc" on "detergent, disinfectants"... ? Do you mean ALL chemical production (paintings? varnishes ? that would be too stringent J...)</i></p>	<p>Accepted</p> <p>The text has been clarified for chemical consumption monitoring. (See section 3.1.5).</p>
	<p><i>We propose to delete this criterion. It has not sense from an environmental point of view that companies have to send annually data of energy, water and hazardous products, and waste generation, to competent bodies. It is better to define criteria to prevent the generation of waste instead of oblige them to quantify the generation.</i></p>	<p>Partially accepted</p> <p>Data collection is needed in order to control the consumption and define targets In order to link this criterion to the EMS (criterion 1) it is suggested to provide data for at least the previous six months (if available) and thereafter the data it is suggested to be provided together with the audit report and the environmental report mentioned in criterion 1. This is set every two years instead of yearly. It is considered that the burden of information flow from applicants to CBs is decreased. (See section 3.1.5).</p>
	<p><i>As it will not be possible to handle this for us as CBs, the requirement "The TA shall report the results yearly to the CB..." shall be deleted or reformulated like: "The TA shall be prepared to report the results on request to the CB."</i></p>	
	<p><i>Suggested to be deleted. Comments: the respect of this criterion appears as a unjustified burden for the EU Ecolabel licensee</i></p>	
<p>Criterion 25 - Information appearing on the eco-label (M30. Information appearing on the</p>	<p><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></p>	<p>Rejected</p> <p>Several stakeholders suggested including requirements on logo visibility through website and mandatory ECAS registration. It is a common practice for tourist accommodation sites to email guests with details of bookings etc. These methods of communication could be used to include information on the EU Ecolabel logo, licence number and the environmental policy with the aim to promote the</p>
	<p><i>Could you please consider as mandatory (not for a 1st application) the subscription to ECAT?</i></p>	

<p>eco-label)</p>		<p>EU Ecolabel and to raise awareness on the environmental policy of the accommodation. However, the possibility of including a mandatory criterion on this has been discarded as the regulation does not oblige the applicant to display the logo in the product/service. (See section 3.1.3)</p>
	<p>— This tourist accommodation service is actively taking measures to reduce its environmental impact using renewable energy sources, saveing energy and water, to reducing waste, to improveing the local environment.</p>	<p>Accepted The text has been amended as suggested (See section 3.5.3)</p>
<p>Criterion 27 - Heating energy from renewable energy sources (up to 2 points) (O32. Energy from renewable sources)</p>	<p>A CB suggested to award extra points and to request that RES percentage is given to clients as information to consumers.</p> <p>We propose following amendment: - Property that provide more than 75% electricity from renewable sources should get 1 point - Propert that provide 100% electricity from renewable souces should get 2 points</p>	<p>Partially accepted It is suggested to align to the benchmark suggested in BEMP and award extra points to those applicants reaching best level of environmental performance (See section 3.7.12)</p> <p>Partially accepted The thresholds suggested are very ambitious and would make this criterion inaccessible to applicants. BEMP is to "install on-site geothermal, solar or wind energy generation where appropriate". The benchmark is: "the equivalent of 50 % of the accommodation's annual energy use is generated by on-site renewable sources". It is suggested to align to the benchmark suggested in BEMP and award extra points to those applicants reaching best level of environmental performance (See section 3.7.12).</p>
<p>O28 - Procurement of labelled electricity (up to 2 points)</p>	<p>"up to" (2 points) could be deleted, as there is only one requirement But this criterion could be combined with our suggestion concerning mandatory critrion 1, e.g. a) 100% of the elecricity procred shall come from RES... (2 pt) b) 100% of the electricity pro cured has been awarded an env. label... (2 pt). Then it shall be "up to 4 points".</p> <p>Ok, but better to indicate 95% instead of 100% (in case of dysfunction)</p> <p>If the basic requirement would be 'watered down' to 50%, we recommend to make voluntary criteria more straightforward. It has to be sure that we are talking about labels that help to "push" the markets (as opposed to self-declarations of companies (possibly certified by a third party). The most obvious formulations would be to require that "the electricity is certified by an independent third party certification scheme, such as EKOenergy or equivalent." - This would be in analogy to for example the text of the EU Ecolabel for copying and graphic paper: "certificates issued by an independent third party certification scheme, such as PEFC, FSC or equivalent." - EKOenergy or equivalent is also the wording used in the LEED standard. Please include EKOenergy (www.ekoenergy.org) and</p>	<p>Partially accepted In order to go a step further the optional criteria awards those applicants purchasing the 100% labelled electricity. More points are allocated in this criterion recognising the potential environmental benefit. In addition, current proposal will probably lead, where tariffs and/or unbundle purchase are available, to the compliance of optional criteria as more points could be awarded and most of the suppliers provide a 100% green tariff where they operate. (See section 3.7.11)</p> <p>Rejected Dysfunction may be associated to onsite generation and this criterion refers to ecolabelled off site RES.</p> <p>Partially accepted Only labelled electricity is awarded. No direct allusion to one single label is made on the criteria text however in the user manual a list with all available labels could be included.</p>

	<p>http://www.ecolabelindex.com/ecolabel/EKOenergy) in the list with ecolabels on page 39 of the technical report. To avoid that readers get the wrong impression that in most of the countries, there are no ecolabels. Which is not true. EKOenergy is available all over Europe.</p>	
	<p>mandatory criterion n.1 asks for 100% of electricity coming from renewable energy sources. There isn't any reason to believe a priori that any environmental label corresponds to an additional environmental benefit.</p>	<p>Rejected It is suggested to require 50% RES for mandatory criterion in order to recognise current market situation. (See section 3.2.6)</p>
<p>Criterion 29 - Efficient space and water heating appliances (1.5 points) (O33. Boiler energy efficiency)</p>	<p>Also other ISO Type I ecolabels shall be allowed and included into the requirement (as already mentioned in the "Assessment and verification" text).</p>	<p>Accepted (See section 3.7.1)</p>
<p>Criterion 30- Water Based Space Heater NOx emissions (O34. Boiler NOx)</p>	<p>Comments: this criterion should be simplified to make it easily verifiable</p>	<p>Accepted The criterion has been simplified.(See section 3.7.10)</p>
	<p>A stakeholder suggested to reword it to clarify that points are awarded for each type of efficient energy generation.</p>	<p>Accepted Clarification has been made with regard to point allocation (See section 3.7.8)</p>
<p>Criterion 31 - Efficient heating generation (up to 4 points) (O35. District heating & O36. Cogeneration)</p>	<p>Suggested rewording 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 shall be provided on site 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. (2 points) Electricity and heating of the sanitary facilities, common areas and rental accommodation shall be provided on site by a high efficiency cogeneration unit according to Directive 2012/27/EU. If the tourist accommodation has such cogeneration unit on-site its The output of heat and electricity shall supply at least 70% of the total heat and electricity consumption on-site in the accommodation service premises. 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. Comments: it must be clear that the heat /electricity generation systems are "on site" i. e. in the accommodation service grounds. The term "district" may be misleading. District heating systems</p>	<p>Partially accepted The suggestions made have been considered in order to clarify the text. (See section 3.7.8)</p>

	<i>serve many local users (families, other commercial activities, etc.) not only the applicant who can't be given the credit of the district heating system realization.</i>	
Criterion 32 - Heat pump (up to 3 points) (O37. Heat pump)	A stakeholder asked to make it clear that criterion refers to EU Ecolabel heat pumps.	Accepted (See sections 3.7.2 and 3.7.3)
	<i>Also other ISO Type I ecolabels shall be allowed and included into the requirement.</i>	
Criterion 33- Heat recovery (O38. Heat recovery)	You made a mistake on point allocation: if we have 1 point for 1 system and 1,5 points for 2 systems, then on the title you should have "up to 1,5 points"	Accepted Clarification has been made with regard to point allocation (See section 3.7.5)
	Comments: it is not really clear the scoring system proposed. Moreover to be significant this criterion should link the scoring system to the quantity (%) of heat recovered.	Partially accepted Clarification has been made with regard to point allocation. With regard to the percentage of recovery there are no available figures and/or benchmarks to set a threshold. (See section 3.7.5)
Criterion 34 - Thermoregulation (up to 3 points) (O39. Thermoregulation)	<i>To control the exact temperatures as suggested might be difficult as not all thermostats allow the regulation according to specific temperatures.</i>	Partially accepted Although this is a strict requirement it is suggested to keep it considering its optional character. The values have been decreased and aligned to Tripadvisor greenleaders. In addition, the temperature in common areas could be set manually into the designated ranges without the need of installing automatic thermostats. (See section 3.7.6)
	<i>In public areas temperature should be preset to mentioned levels, however, if there are repeated guest complaints, regarding temperature discomfort, temperature can be preset differently. In rooms temperature should be preset to mentioned levels, but guests could change the temperature in the room to their own comfort zone.</i>	The values have been decreased and aligned to Tripadvisor greenleaders. (See section 3.7.6)
	<i>It's important to understand that in campsites, the use of thermostat is not possible (we need to install specific devices to have a regulated temperature). The previous criterion was allowing the fact of having a separated control of temperature on each accommodation... that's why it's important to keep the previous criterion for CSS...</i>	Partially accepted Although this is a strict requirement it is suggested to keep it considering its optional character. The values have been decreased and aligned to Tripadvisor greenleaders. In addition, the temperature in common areas could be set manually into the designated ranges without the need of installing automatic thermostats. (See section 3.7.6)
	<i>The 21°C target in the common areas is too low in winter for ladies. In fact we you are lightly dressed like in a high level restaurant, 21 would be too low. Second point, the 2 parts of each category in the proposed criterion: 1,5 points for rooms (25.5 in summer / 21 in winter) and 1,5 points for common areas (22°C in winter and 25,5 in summer) Just a comment - in a campsite it's quite impossible to have this kind of temperature control for a simple reason: if in an hotel you can have connected thermostats, it's quite impossible to connect mobilhomes in a campsite. In the mobilhome can have a 25,5°C limited A/C, as we use electric heaters, it's impossible to have a 25,5°C limited heating system... The only solution would be to install a specific device (like presented on: http://www.mob-i.fr/) but the cost of the device is VERY high (around 500/800€ for the device + the same for the connexion of the mobilhome). Moreover with this kind of device, you need to have either a network connexion on the camp (cable or wifi) to communicate with the server... that cost a LOT... My purpose would be to have a specific approach for campsites... like the older one: it's possible to choose the temperature in every accommodation. Or maybe another option can be: in the colder</i>	

	<p>season and in order to prevent the use of energy, the campsite add so more blankets for free... It can be an idea...</p>	
	<p>Suggested rewording Criterion 34 - Thermoregulation Automatic management and monitoring system (up to 3 points) Heating/air conditioning systems shall be equipped with an automatic management and monitoring system. The temperature in every common area (for example restaurants, lounge areas, and conference rooms) shall be individually regulated within the following designated range: i. Temperature setpoint, while in cooling mode, is set at or above 25.5°C for the duration of the summer. (0.75 points) ii. 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: i. Temperature setpoint, while in cooling mode, is set at or above 25.5°C for the duration of the summer. (0.75 points) ii. 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 the relevant documentation on the thermoregulatory systems and the setpoint range: e. g. technical specification from the professional technicians responsible for the installation sale and/or maintenance of the air conditioning system. Comments: the respect of this criterion within the duration of the EU Ecolabel license is quite impossible to verify. An automatic management and monitoring system should be realized when a new heating/conditioning system is installed (see newly proposed criterion 3 bis).</p>	
<p>Criterion 35- efficient air conditioning appliances (O41. air conditioning)</p>	<p>It could be interesting to add on this criterion the idea of “adjusting diagnostic” for A/C. In fact there is so many options on an A/C that some companies can realize diagnostics to help adjusting the A/C regarding to the energy-saving criterias... this adjustment need to be paid but the impact on energy saving is quite high... so it can be awarded with 1 point for exemple. On this criterion, you would have 1 point for 15% higher ... and 1 point for the diagnostic</p>	<p>Rejected There are already criteria for automatic switching, energy efficiency, temperature settings and maintenance. Extra requirements on energy might be an additional degree of complexity within the criteria set.</p>
<p>Criterion 37 - Energy efficient refrigerators, ovens, dishwashers, washing</p>	<p>A stakeholder expressed that in paragraph a minibars with class A should be added and change the title to electric appliances</p>	<p>Accepted (See section 3.7.4)</p>

<p>machines, dryers/tumblers and office equipment (maximum of 4 points) (O44. Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumbler and office equipment)</p>	<p>(g) (1 point): At least 90% of hair driers and hand driers shall be of EU Energy Label rated Class A or better as laid down in</p> <p>Assessment and verification: The applicant shall provide documentation indicating the energy class of all electric hair driers and hand driers.</p>	<p>Rejected There is no energy label for such appliances</p>
<p>Criterion 38 - Automatic switching off lights and household air conditioners in tourist accommodation (1.5 points) (O47. Automatic switching off lights in tourist)</p>	<p><i>The requirement shall be divided into two (lights and / or air conditioners) as not always both of them will be installed and it seems useful to grant points also if one of the two is automatically regulated</i></p> <hr/> <p><i>To my opinion, this criterion needs to be unmerged. In fact, having a system to shut down lights and to shut down A/C is 2 thinks absolutely different... So maybe, it would be interesting to have 0.75 points for each instead of 1.5 point for 2</i></p>	<p>Partially accepted Although all devices/appliances have been merged under one single criterion. In order to clarify, requirements for each device/appliance are clearly separated under different sub requirements. (See section 3.7.7)</p>
<p>Criterion 39 - Swimming pool heating with on-site renewable energy sources (up to 1.5 points) (O49. Swimming pool heating with renewable energy sources)</p>	<p>A stakeholder suggested to remove the reference to <i>onsite</i> as district heating could also be used for this purpose.</p> <p><i>Not only "on site" renewable energy sources shall be allowed as there might be e.g. also renewable energy sources coming from district heating with biomass.</i></p> <p><i>It is our opinion that "in-site" limitation should be removed. It is irrelevant where renewable energy comes from, whether on site or outourced.</i></p> <hr/> <p><i>2 points where suggested. Delete the definition at A&V as definition of renewable energy sources is in the "Definition" paragraph at the beginning of this doc.</i></p>	<p>Accepted (See section 3.7.14)</p> <hr/> <p>Rejected Key definitions are included in the criteria. However as this product group consist in a large amount of criteria and refers to a high number of regulation (especially for appliances) to include the definitions for all the appliances may have a marked impact on the length of the legal text. Instead only key definitions are included and the reference to the regulation for appliances is made. In addition we suggest following the current approach for this product group</p>

		which include a list of definitions on the User manual.
Criterion 41 - Use of alternative water sources (up to 4 points) (O51. Use of rainwater and recycled water)	<p>Suggested rewording</p> <p><i>Criterion 41 - Use of alternative water sources (up to 4 points)</i></p> <p><i>At least 50% of the water used by the accommodation service shall use the following alternative water sources for non-sanitary and for non-drinking purposes such as e. g. green areas watering or discharge water in toilets in the accommodation facility, up to a maximum of 3 points shall come from alternative water sources like the following:</i></p> <p>(a) Reclaimed water or grey water from laundry (1 point), and/or showers (1 point), and/or lavatory sinks (1 point)</p> <p>(b) Rainwater via rooftop (1 point)</p> <p>(c) Condensate from HVAC systems. (1 point)</p> <p><i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation service fulfils this criterion, together with technical documentation from those responsible for the design, the realization and the maintenance of the system. Photographs showing alternative water distribution systems may be added, and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.</i></p> <p><i>Comments: alternative water sources have to be appraised if they give a significant contribution to save water from the aqueduct.</i></p>	Rejected With regard to the percentage of water used there are no available figures and/or benchmarks to set a threshold. The criterion is aligned to BEMP and Tripsadvisor Greenleaders scheme. (See section 3.8.7)
Criterion 42 - Efficient irrigation (up to 1.5 points) (O52. Automatic watering systems for outside areas)	<p>A stakeholder suggested removing it. Another stakeholder mentioned that the irrigation must be done according to community local regulation.</p> <p><i>Add:</i></p> <ul style="list-style-type: none"> - Own well (1 point) - Water from ice machines (1 point) <p>Suggested rewording <i>Criterion 42 - Efficient irrigation (up to 1.5 points)</i></p> <p><i>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)</i></p> <p><i>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.</i></p> <p><i>OR</i></p> <p><i>The tourist accommodation service shall use an automatic system which optimises watering times and water consumption for outside areas/plants. (1.5 points)</i></p> <p><i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation.</i></p> <p><i>Comments: partially moved to mandatory section.</i></p>	Rejected BEMP is to minimise water consumption for irrigation. Benchmark suggested in BEMP is: <i>Minimise water consumption by planting native species and mulching, and by installing controlled irrigation systems fed with grey water where possible</i> The criterion is in line with best practices (See section 3.8.8)
Criterion 43 - Water flow from taps and shower heads (up to 3 points) (O53.)	<p><i>An average flow of 6 l/min seems to be very low and might not meet the consumers needs anymore. Also other ISO Type I ecolabels shall be allowed and included into the requirement.</i></p>	Partially accepted 6l/min is in line to best practices. In addition, it is suggested to include a requirement on labelled taps and showers however with the aim to recognise the lack of availability of these products on the market other ISO type I labels are accepted and as a minimum 50% of toilets/urinals is requested. (See section 3.8.1)

Water flow from taps and showerheads)	<i>Filing station should be excluded. EU Ecolabel taps and shower heads should be removed.</i>	Accepted
	<i>We have to be careful, it's difficult to achieve 6 litres. We would like to underline the problems raised when discussing the final criteria on sanitary tapware (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)"</i>	Partially accepted For mandatory criterion the text "Without prejudice of the local or national regulation on water flow rate..." has been introduced to consider potential difficulties associated to functioning of the sewage system. However as this criterion is an optional requirement it is suggested to be in line with benchmarks and to not introduce reference to local/national regulation as the applicant is not obliged to fulfil this. (See section 3.8.1)
	Suggested rewording <i>Criterion 43 - Water flow from taps and shower heads (up to 3 2 points) The average flow from all taps and filing stations (excluding bath tub taps) shall not exceed 6 litres/minute. (±5 1 point) At least 50% of taps and shower heads shall have been awarded the EU ecolabel. (±5 1 point)</i>	Rejected BEMP suggests that there is a real opportunity for tourist accommodations to better manage water consumption, reducing their environmental burden. This is a relevant and a strict criterion. The potential environmental benefit is suggested to be recognised by awarding extra points.
Criterion 45 - Washing machine water consumption (2 points) (056. Washing machine water consumption)	Here should be evaluated professional machines too, not only household machines. 12 L/kg wash load should stay as criteria for such cases. Points should be assigned to tourist accommodation even if laundry is dislocated and provide service for more properties.	Partially accepted BEMP promotes the selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption and an average laundry water consumption ≤ 7 L per kg of laundry washed for commercial washing machines. A requirement aligned to BEMP benchmarks on commercial washing machines has been introduced. (See section 3.8.4)
	A stakeholder suggested to move criteria 44 and 45 to mandatory criteria.	Rejected This criterion would be too much a burden as mandatory criterion.
Criterion 46 - Swimming pool cover (1 point) (059. Swimming pool cover)	Suggested rewording <i>Criterion 46 – external Swimming pool cover (± 2 point) A covering mobile structure shall have been realized on site to cover all external swimming pool in both the following cases: (a) heated swimming pools shall be covered at night to prevent the cooling of the water in the pool and to reduce evaporation, and/or; (b) non-heated, filled swimming pools shall be covered when these are not used for more than a day week 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. Comments: the continuous respect of a criterion that foresees only the use of a tarpaulin should be very difficult if not impossible to assess.</i>	Rejected BEMP for the operating of swimming pools does suggest: The correct use of pool covers to reduce heat loss. Minimisation of chlorine consumption In addition, natural pool installation is suggested: This criterion is in line with BEMP (See section 3.8.6)

Criterion 47 - Indications on water hardness (up to 2 points) (O61. Indication on water hardness)	<i>As a suggestion, several criteria do not address main/significant environmental impacts, as required by the EU Ecolabel Regulation, and should be removed. This was echoed by UK, ES, Afnor, and Bond Beter Leefmilieu. For example, the use of chemicals (Criteria 47, 50, 51, 52, 53, 64, 65) is disproportionately focused on. As rationale, the pedagogic character of an Ecolabelled hotel / camping site was given. We understands this rationale, but thinks that turning them into criteria is not the right way, because the LCA, as mentioned correctly by the Commission, has not highlighted chemicals as an important environmental impact. The proposal of AT to have a cleaning plan may be a way out.</i>	Partially accepted The criteria set have been simplified with the aim to focus on environmental hotspots. Criteria that are kept are in line as much as possible with LCA/BEMP benchmarks. (See section 1.2.2)
	<i>OK. But write "OR" instead of "and" because there are different scopes.↵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.</i>	Accepted (See section 3.8.5)
	<i>I don't understand your change: if you put "and" that would mean that you both need to have the indication on water hardness and the automatic dosage system... as each one is OK for one point, the "and" doesn't have a real opportunity</i> Suggested rewording <i>Criterion 47 – Detergents automatic dosage systems Indications on water hardness (up to 2 1 points) In proximity to sanitary areas and close to 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 systems (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. Comment: the part of the criterion referring to information should be moved to criterion n. 23</i>	Partially accepted Suggestion on point allocation has been considered. (See section 3.8.5)
Criterion 48 - Water saving urinals and toilets (up to 3 points) (O62. Water saving urinals)	<i>It was considered to be very strict as there are very few licenses for EU Ecolabel toilets. Another stakeholder suggested including the requirement on EU Ecolabel toilets on the criterion on durable goods.</i>	Partially accepted For optional criterion it is suggested to include a stricter requirement requesting labelled toilets and urinals however with the aim to recognise the lack of availability of these products on the market other ISO type I labels are accepted and as a minimum 50% of toilets/urinals is requested.(See section 3.8.2)
	<i>Also other ISO Type I ecolabels shall be allowed and included into the requirement.</i>	
	<i>We propose to move this criteria from water to other services, because include other aspects than water saving. Suggested 2 points instead 3.</i>	Rejected This is in line with BEMP suggestions.
Criterion 50 - Detergents and toiletries (up to 3 points) (O64. Detergents)	<i>As a suggestion, several criteria do not address main/significant environmental impacts, as required by the EU Ecolabel Regulation, and should be removed. This was echoed by UK, ES, Afnor, and Bond Beter Leefmilieu. For example, the use of chemicals (Criteria 47, 50, 51, 52, 53, 64, 65) is disproportionately focused on. As rationale, the pedagogic character of an Ecolabelled hotel / camping site was given. we understands this rationale, but thinks that turning them into criteria is not the right way, because the LCA, as mentioned correctly by the Commission, has not highlighted chemicals as an important environmental impact. The proposal of AT to have a cleaning plan may be a way out.</i>	Rejected 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".(See section 3.9.4)
	<i>Also other ISO Type I ecolabels shall be allowed and included into the requirement.</i>	Accepted (See section 3.9.4)
	<i>Could you write some bullets to clarify the new criterion?</i>	Accepted

		(See section 3.9.4)
	<i>Suggested 2 points instead 3.</i>	Accepted (See section 3.9.4)
051 - Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (2 points)	<i>As a suggestion, several criteria do not address main/significant environmental impacts, as required by the EU Ecolabel Regulation, and should be removed. This was echoed by UK, ES, Afnor, and Bond Beter Leefmilieu. For example, the use of chemicals (Criteria 47, 50, 51, 52, 53, 64, 65) is disproportionately focused on. As rationale, the pedagogic character of an Ecolabelled hotel / camping site was given. we understands this rationale, but thinks that turning them into criteria is not the right way, because the LCA, as mentioned correctly by the Commission, has not highlighted chemicals as an important environmental impact. The proposal of AT to have a cleaning plan may be a way out.</i>	Rejected BEMP for the operating of swimming pools does suggest: The correct use of pool covers to reduce heat loss. Minimisation of chlorine consumption In addition, natural pool installation is suggested: This criterion is in line with BEMP (See section 3.8.6)
	<i>Keep this part of the criterion as an automatic dosage system is a means to reduce the chemicals used to the minimum required.</i>	Accepted (See section 3.8.6)
	<i>We are in favour to keep it</i>	Accepted (See section 3.8.6)
	<i>The swimming pool shall have an automatic dosage system that uses the minimum amount of disinfectant for the appropriate hygienic result and a documented procedure to use it (1 point).</i>	Accepted (See section 3.8.6)
Criterion 52 - Organic gardening (2 points) (070. Organic gardening)	<i>Several stakeholders mentioned that organic gardening is a relevant criterion. In addition most of criteria under this section are considered important to raise consumer awareness.</i>	Partially accepted Criterion is suggested to be kept. However it has been reworded to be clearer and focused on pesticide avoidance. (See section 3.10.7)
	<i>Keep this criterion as it is not only relevant for reducing chemicals but also for guests health and safety and the biodiversity.</i>	
	<i>We are in favour to keep it. It's an educational element for customers</i>	
	<i>it's again a question of image: would you imagine how bad image can show a TAS who can garden with very dangerous products... So to my opinion, there is no debate on this point: we need to keep it!</i>	
	green areas with a surface greater than xxx (to be defined) square meters	
	<i>Comments: a minimum surface area must be indicated for green areas to which this criterion should be applied. Management without any use of pesticides would be quite impossible to demonstrate.</i>	
	<i>Keep the criterion, being one of the few also targeting the biodiversity issue. Especially for camp sites this criterion is very relevant as they have to use insect repellents sometimes and this criterion helps to protect their guests in a more sustainable way.</i>	
<i>We suggest keeping the criterion on insects and pests repellents, as already contained in the current document: "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)." However, we would like to share some concerns with regard to the following issues: -the provision of mosquito nets is not common in many parts of the world. Therefore, we recommend to specify in the criterion: 'if regionally appropriate' -We would like to have clarifications on the "mosquito coil". As these coils are coated with chemicals we believe their use is not environmentally friendly and could have severe health effects. Some of the</i>		

	<p>chemicals which are used on coils such as bis-chloromethyl ether (BCME) or Octachlorodipropylether (S-2) are known to cause lung cancers. We recommend the JRC to further investigate this issue and to look carefully into studies which indicate that there is a risk of lung cancer related to the exposure to mosquito coil smoke.</p> <p>o Exposure to mosquito coil smoke may be a risk factor for lung cancer in Taiwan, U.S. National Library of Medicine National Institutes of Health, 2008, http://www.ncbi.nlm.nih.gov/pubmed/18305363.</p> <p>o Think about your lungs too, Alpha Moscon Technologies, http://alphamoscon.in/effects-of-mosquito-coil.html.</p> <p>Insect and pest repellents are an issue for campsites who are settled in nature and have to "protect" their guests in an environmentally way. I suggest addressing this criterion just for campsites</p> <p>Suggested rewording</p> <p>Criterion 53 - Insect and pest repellents (up to 2 1 points)</p> <p>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).</p> <p>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).</p> <p>Assessment and verification: The applicant shall provide a detailed explanation how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation if relevant.</p> <p>Comments: the part of the criterion referring to the use of mosquito nets and coils has been moved to mandatory section</p>	
<p>Criterion 54 - Composting (up to 4 points) (O72. Composting)</p>	<p>The statement (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).)should be replaced with following: "...and shall ensure hat it s composted ad/or used for bogas production, accornrgto local authority gidelines..."</p> <p>Suggested rewording</p> <p>Criterion 54 - Composting (up to 4 3 points)</p> <p>The tourist accommodation service:</p> <p>(1) shall separate at least 50% of the following relevant waste produced by the accommodation service:</p> <p>(a) yard waste (1 point)</p> <p>(b) food waste form restoration service (1 point),</p> <p>(c) biodegradable products (e.g. disposable items made of corn-based materials) (1 point),</p> <p>(d) food waste produced by guests ate their room/accommodation (1 point),</p> <p>(2) and shall compost the above mentioned waste ensure that it is composted according to local authority guidelines (e.g. by the local administration, in-house or by a private agency) in the accommodation service grounds. This part of the criterion doesn't apply to waste that are not compatible with the composter and to the accommodation services whose grounds are not fit for this use according to the local norms.</p> <p>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation service fulfils this criterion, together with appropriate supporting relevant document.</p> <p>Comments: criterion n. 15 already covers waste collection, not excluding compostable waste, as</p>	<p>Partially accepted See rewording (See section 3.9.8)</p> <p>Rejected With regard to the percentage of waste composted there are no available figures and/or benchmarks to set a threshold.</p>

	<p>required by the local waste management facilities. This criterion may award applicants composting by themselves.</p>	
<p>Criterion 55 - Beverages provision (3 points) (073: Disposable drink containers & 086. Returnable or refillable bottles)</p>	<p>Single-dose packages (Criterion 17, 55) often prove to be the more eco-efficient alternative in comparison to reusable packaging. The main arguments justifying the use of single-dose packages are hygiene, (food) safety, resource savings (less content loss), lower energy consumption at the production, and finally practicability by the applicant.</p> <p>For these reasons, we ask to remove every general recommendation to avoid disposable products, and any concrete discrimination of disposable products, since such an approach is not based on science, too generic, and in contradiction with recent findings.</p> <p>The criterion on returnable or refillable bottles (Criterion 55) is too generic. This was echoed by hotel owners. This criterion should only be there when an improved environmental impact (including transport of empty refillable bottles) has been shown on a case-by-case basis.</p> <p>The merge of the 2 criteria seems to be a very good idea... My question is: how would you consider shops... In campsite, we sometime (most of the time) have some little shops (some a huge: my colleagues at "Camping le Vieux Port" and "Camping Lou Pignada" in Messange France – EE Ecolabel) have a shop as big as a supermarket... So do you consider this criterion only for Bar/restaurant or do you mean it would be impossible to have disposable drink containers also in the shops? We what is a disposable drink containers? - If I have some cans: it can be recycled... so it's not disposable - If I have some bottles: it can be recycled... so it's not disposable - If I have some plastic bottles: it can be recycled... so it's not disposable So what do you have for disposable drink containers? ☒ Need to be reworded to my opinion... concerning the word "disposable" and concerning the problem of shops ☒</p> <p>To my opinion, the word "ALL" is still too stringent... I'll keep 90% for example as I already developed because you can't give everything you need to consider that there is still something that can't be given... Maybe you can add on this criterion the idea of perishable products in stores that can't reach the next season... As we sell some food on our stores on CSS, we most of the time store during winter what can be sold for the next season... and the rest is given to employees or charity</p> <p>Suggested rewording Criterion 55 - Beverages provision (3 2 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 service. 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).</p> <p>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist</p>	<p>Rejected</p> <p>BEMP promotes the importance re-using products, as outlined in the waste hierarchy:</p> <ol style="list-style-type: none"> 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. <p>This is an optional criterion. It is stringent but applicant is not obliged to fulfil it. This criterion is awarding sites using returnable/refillable containers for beverage provision instead of recyclable plastic/cans (including vending machines). The wording has been amended to avoid the word disposable. (See section 3.9.3)</p>
	<p>Suggested rewording Criterion 55 - Beverages provision (3 2 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 service. 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).</p> <p>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist</p>	<p>Accepted the suggestion with regard to point allocation</p>

	accommodation fulfils this criterion, together with appropriate supporting relevant documentation if relevant .	
Criterion 56 - Used textiles, furniture and other products (up to 3 points) (076. Used textiles, furniture and other products)	Keep this criterion as it helps to reduce solid waste and to prolonge the lifetime and reuse products that can still be used even if they cannot be used by the TA anymore.	Partially accepted The criterion is proposed to be kept. Considering that is optional criteria and the points are awarded for actions that shall be in place at the award moment, the wording has been revised to award points to sites with a donation procedure in place. In addition, if receipts and records for past donations are available, these could be used for verification. (See section 3.9.7)
	The sentence behind the comma should be supplemented: "... shall be given to charity and/or employee and/or used for other purposes in tourist accommodation (2 points) or sold (1 point) to other association which collect and redistribute such goods, or to individuals."	
	We are in favour to keep this criterion because some of TAS reached it. It's important to leave some achievable criterion in order to obtain the minimum required. But write "or" instead of "and" : All furniture, textiles or other products ...	
	Suggested rewording Criterion 56 - Used textiles, furniture and other products (up to 3 1 points) All furniture, textiles and other products such as electronic equipment, that have reached the end of their usable life within the tourist accommodation grounds , shall be given to charity and/or employees (2 points) or sold (1 point) given to other associations which collect and redistribute such goods thus avoiding they become waste .	
Criterion 57- Tourist accommodation traffic management (077. Regulation of campsite traffic (campsite only & 078. Campsite generated traffic (campsite only))	Could we imagine having "shall be limited to a few hours". My idea is still that all CSS limit the traffic at night... that makes the point be accepted...	Partially accepted Setting a number of hours is difficult as it will depend on different factors. However, in order to recognise that the requirement on limiting the traffic to defined hours is relatively easy the number of points has been reduced for this requirement. Instead, more points are awarded for applicants that do not use combustion vehicles. (See section 3.10.3)
	Suggested rewording Criterion 57 - Tourist accommodation service traffic management (up to 2 points) All traffic for (guests and maintenance/ transport) on the tourist accommodation service site shall be limited to defined hours and areas . All traffic for maintenance on the accommodation service site shall be limited to defined hours. (1 point) The tourist accommodation service shall not use combustion motor vehicles for transport and maintenance on site. (1 point)	
058 - Unsealed surfaces (1 point) (campsites only) (080. Unsealed surfaces (campsite only))	OK, but it has to be opened to all kind of TAS, because they can reach it.	Accepted
Criterion 59 - Roof and façade landscaping (up to 2 points) (081.	Keep this criterion as roof and facade landscaping influence the microclimate positively and thus is an additional benefit for guests. It has also positive effects for the biodiversity and even can contribute to save energy.	Rejected With the aim being to simplify the criteria set and to focus on environmental hotspots. In addition, the analysis carried out for 623 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the low impact criteria revealed

<p>Roof landscaping)</p>	<p>Rare, but we are in favour to keep it. More points should be allocated It's better to write "or" instead of "and": 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) or" façades (1 point) and are not used for other purposes shall be grassed or planted.</p> <p>I'm in favour of keeping image imageimageimage and image</p> <p>Suggested to be deleted. It is quite impossible to be sure a priori that such a solution minimize the environmental impact of the buildings. Watering and other activities to take care of the plants/grasses have an impact that should be taken into account. Other solutions could have a smaller impact</p>	<p>a very low fulfilment for this criterion compare to other optional criteria. (See section 4)</p>
	<p>It was suggested to set a percentage (e.g 2 bikes for each 10 places).</p> <p><i>We don't think it is necessary to define the exact amount of "ten bikes per 50 pitches" etc. There are TA with less than 50 rooms / pitches, they shall then have to fulfill the quota accordingly. Also the demand will regulate the supply and it is more important that the offer of bikes is promoted in an adequate and motivating way.</i></p> <p><i>This criterion should remain the same. 10 bikes is not relevant for a small bed and breakfast, 3 was better. A difference should be made between accomodations that count less than 10 rooms and the others.</i></p>	<p>Accepted</p> <p>The criterion has been adapted to all size type of accommodation.(See section 3.10.4)</p>
<p>Criterion 62 - Bicycles (1.5 points) (O84. Bicycles)</p>	<p>Suggested rewording Criterion 62 - Bicycles (1.5 1 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). Bicycles shall be provided to guests by the accommodation service directly or through an Or The tourist accommodation shall have active partnerships with bicycle hire companies; access to these shall be clearly communicated to guests (1 point). 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. Assessment and verification: The applicant shall provide an explanation of how the tourist accommodation fulfils this criterion along with all relevant documents 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.</p>	<p>Partially accepted</p> <p>Suggestions have been partially considered to reword the criteria text.(See section 3.10.4)</p>
<p>Criterion 63 - Rechargeable products (up to 2 points) (O87. Use of rechargeable products)</p>	<p><i>Keep this criterion, as it helps to reduce batteries etc. and it is an additional criterion for licencees to obtain points.</i></p> <p><i>We are in favour to keep this criterion because some of TAS reached it. It's important to leave some achievable criterion in order to obtain the minimum required</i></p> <p><i>Suggested to be moved to mandatory section.</i></p>	<p>Rejected</p> <p>With the aim being to simplify the criteria set and to focus on environmental hotspots, it is suggested that this criterion is removed as a number of other EU Ecolabel criteria for tourist accommodation relate directly to durability. In addition, the analysis carried out for 693 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the low impact criteria revealed a very low fulfilment for this criterion compare to other optional criteria.</p>

Criterion 64 - Paper Products (up to 2 points) (088. Paper products)	<p>We propose that maybe this criterion can start on a basis of 100% and be lowered (to 95% for exemple) in order to consider an eventual "un-normal use". On this way, all the establishments who want to validate this optional criterion would have to use 100% of certified paper, but the eventuality of an urgent purchase of non certified paper would be included in a 5%.</p> <p>If we interest us in the method of control of the percentage of certified paper used, it may consist in keeping one copy of each paper used with the specification of the quantity an references of it together with all the invoices.</p>	<p>Partially accepted</p> <p>We understood that with the aim to fulfil the requirement, the applicants will tend to buy totality of EU Ecolabel paper. However to have the 90% will allow some flexibility for eventual purchases. The suggested method of control of the percentage could be introduced at the user manual. (See section 3.9.1)</p>
	<p>This criterion shall be kept in the document and not be deleted.</p> <p>Also other ISO Type I ecolabels shall be allowed and included into the requirement.</p>	<p>Accepted</p> <p>The criterion is kept and other Type of ISO labels are accepted.</p>
	<p>We are in favour to keep this criterion because some of TAS reached it It's important to leave some achievable criterion in order to obtain the minimum required. We should add 1 more point instead of removing one, because that promote ECOLABEL products. So, up to 4 points. Indicate "converted paper" instead of "envelopes"</p>	<p>Rejected</p> <p>It is proposed to reduce the awarded points according to the environmental benefit compared to other criteria. In addition, it requires low investment. (See section 3.9.1)</p>
Criterion 65 - Durable goods (up to 5 points) (089. Durable goods)	<p>"At least 50%" seems too demanding, as already the former required 30% were not fulfilled by aplicants so far.</p>	<p>Partially accepted</p> <p>With the aim to increase the environmental benefit in the revised version, a compromise has been taken and 40% is proposed for this optional criterion.(See section ☒)</p>
	<p>It will be relevant to add "and services" in the title : Durable goods and services</p>	<p>Rejected</p> <p>The scope of the criteria is durability of products. In addition there are other criteria addressing services suppliers.</p>
	<p>3 points instead of 5</p>	<p>Accepted</p> <p>Suggestion has been applied in the revised criterion.(See section ☒)</p>
Criterion 66 - Local products (up to 3 points) (090. Local food products)	<p>This criterion shall be kept in the document and not be deleted! Local products need less energy for transportation, support the local economy and are mostly typical for a region.</p>	<p>Accepted</p> <p>Considering the environmental impact associated to long distance transport for product procurement, the criterion on local products is kept. (See section 3.10.6)</p>
	<p>We are against the deletion of this criterion on consumption of endangered species (extract of current criterion 90: Local food products) We fully support the objective that Ecolabelled Tourism services should not offer dishes which contain food from endangered species or unsustainable sources. We therefore support the current criterion, stating that:</p> <p>"Consumption of endangered species such as specific fish and crustacean species and 'bushmeat' and shrimps from mangrove forest endangering cultivation shall be forbidden."</p> <p>In addition, in our view, the criterion does not tackle exactly local food but focuses on protected species.</p> <p>We suggest establishing an exhaustive list of species which production and consumption is not environmentally friendly at all, e.g. Pangasius, a large shark catfish, which lives in mangrove areas.</p>	
	<p>We are in favour to keep this criterion because some of TAS reached it It's important to leave some achievable criterion in order to obtain the minimum required.</p>	
	<p>We strongly recommend to keep this criteria to incite stakeholders to be more local (support local economy and cut transportation impacts). Strong consumer demand for local products. Define a distance which could be different for big cities. Suggest in the criteria to grow on the premises.</p>	
	<p>I'm in favour to keep it because of the image</p>	
	<p>Suggested to be moved to mandatory section.</p>	<p>Rejected</p> <p>Although there is an environmental benefit associated to the proposed criteria, not any TA has an easy access to local product suppliers. This criterion fits better as an optional requirement.</p>

	<p><i>Community engagement</i> <i>Local, National or international involvement to support community or charity initiatives, money or skills (guided visits to schools, telethon,)</i> <i>Special attention to accommodate people with special requirements: disabilities, special diets (gluten free, milk free, vegetarian, religious diets...)</i> SUSTAINABLE FOOD <i>Promote vegetal food</i> <i>Attention to Allergen</i> <i>Every initiative to go beyond EU new allergen regulation</i> <i>More attention to seasonal, local and organic</i> <i>palm oil free products or with sustainable palm oil</i> <i>tableau des allergènes alimentaires (réglementation alimentaire)</i> <i>Focus on meal free option: meat free, gluten free, milk proteins free</i> <i>- Breakfast focusses on vegetal offers (give the central place to vegetal products, limit charcuterie, milk and butter viennoiseries; put forward fruits, crudités, dry fruits and breads and cereals) +1pt</i> <i>-Allergen free offer meal Gluten free bread is offered on demand at breakfast and at the restaurant</i> <i>Milk protein free proposal are offered at breakfast and at the restaurant +1pt</i> <i>-The restaurant offers a vegetarian options at the menu +1pt</i> <i>palm oil free products or with sustainable palm oil</i> <i>- Affichage produits frais et provenance</i> <i>- Local plant criteria</i> <i>The idea is to know if the plants are grown locally by a pépinière (200km) and/or typical from the region (speciality like Mimosa in l'île de Ré or Cote d'Azur)</i></p>	<p>Partially accepted Some of the suggestions are covered in criteria on Environmental and social communication and education and criteria for local and organic products procurement. (See section 3.6.4)</p>
<p>Criterion 68 - EMAS registration (4 points), ISO certification (3 points) of the tourist accommodation (up to 4) (093. EMAS or ISO registration)</p>	<p><i>We don't agree to remove this criterion. The criterion should remain as it is in the current decision. The environmental policy and programme are management tools that structure actions in times. Please be aware that very few TAS are certified EMAS and 14001. And the environmental policy it's not optional in the ISO 14001 certification. Besides the different steps of EMAS are too complex to implement for TAS. Most of TAS are small structure. For example is difficult to carry an internal environmental audit. TAS don't have a dedicated person, with the necessary skills.</i></p> <p><i>Comments: it is necessary to put in evidence the great difference existing between EMAS and ISO 14001. Moreover since organizations with EMAS certification were very likely awarded the ISO 14001 certification too it is quite incorrect to sum points for ISO with those for EMAS. It is suggested to award only 1 point for ISO.</i></p>	<p>Partially accepted The criterion is kept and no option to sum points is proposed. (See section 3.6.1)</p>
<p>Criterion 69 - EMAS registration (3 points) or ISO certification (2 points) of suppliers (094. Suppliers EMAS or ISO registered)</p>	<p><i>We think the former wording requiring only one supplier to be certified is enough. Or maybe points could be splitted (e.g. one EMAS supplier 1,5 pts., two suppliers 3 pts. etc.)</i></p>	<p>Accepted Suggestion has been applied in the revised criterion.</p>

<p>Criterion 70- Compliance by subcontractors with mandatory criteria (O95. Subcontractors comply with mandatory criteria)</p>	<p><i>I saw the comment under the criterion: my proposal was to put “up to 5 points” but “1 point” for each subcontractor... ☒</i></p> <p><i>Maybe you can have an allocation of extra-point when the TAS is actively involved on the compliance... for example, I have 2 subcontractors who comply this criterion and I’m still the one who make the dossier to prove the compliance...</i></p> <p><i>So maybe we can have : up to 5 points</i></p> <ul style="list-style-type: none"> - 1 point for each - but 2 points if the TAS s actively involved on the process 	<p>Rejected</p> <p>The criterion would then score too high relative to others. The criterion has been revised. (See section 3.6.3)</p>
<p>Removed criteria in Technical report 2</p>		
<p>M6. Window Insulation</p>	<p><i>It’s better to keep it for the image of the TAS. They have to think about it and to ameliorate their situation.</i></p> <p><i>rying to remove the reference to double-glazed windows because of a technical problem of translation send a very bad image of the EE Ecolabel. I can’t imagine going to Northern Europ on a heated hotel with single-glazed windows of to southern in a air-cond hotel with single-glaced windows... You have to consider both the image send by an awarded TAS and the difficulty (I know it’s not an easy work!) to make a correct definition...</i></p>	<p>Partially accepted</p> <p>This criterion has been reintroduced in prerequisites section (See section 2)</p>
<p>M17. Disinfectants</p>	<p>With regard to the deletion of several criteria under Detergents and disinfectants section, several stakeholders suggested to reintroduce some of them as are considered as easy points and give the chance and flexibility to score the minimum points needed to award the license.</p> <p>It was mentioned that change habits on disinfection has been a lot effort for license holders and that the impact is very important. To remove lot criteria under this section is considered a step back.</p> <p>However a CB suggested that reword according to legislation could be a possibility to keep criteria on minimisation of chemicals. Another CB mentioned that mechanical cleaning is better that using chemicals.</p> <p>It was mentioned that Nordic Swan label has criteria on dosage and measurement of the detergent use. It was suggested to explore this in order to include reintroduce the criteria on detergents minimisation.</p> <p><i>We don’t agree to remove it, because there is a risk of return backwards.</i></p> <p><i>I can imagine it’s difficult to control for CB... But it’s a huge point of thinking for awarded TAS... before getting the Ecolabel... they have to think about how using the disinfectants and it’s a great opportunity to speak with CBs on this theme...If you want to cancel it, maybe we can imagine an “Ecolabeled Open-Bleach week” : everything wash with bleach from the ground to the roof!!! J</i></p> <p><i>Although this criterion is difficult to verify, it is currently the only way to make an accommodation consider where disinfection is needed and to reduce disinfection only to legally required areas. Without any criterion on this relevant area, disinfectants might be used more than useful. Most of the active components of disinfectants are dangerous to the environment and have toxic, allergenic or other negative health aspects - and the use of substances that may have (needles) impact on the environment or for humans shoud be limitd. Incorrect application of disinfectants could cause on the one hand infection or intoxication and on the other hand lead to the contamination of surfaces and foods with undesirable chemicals. A false sense of safety could also negatively effect unprofessional application of disinfectants. Unnecessary use of disinfectants could lead to harmful micro-organisms</i></p>	<p>Partially accepted</p> <p>This criterion has been partially reintroduced in criterion Staff training. (See section 3.1.2)</p>

	<p><i>adapting to these agents, which would then require the use of higher dosages of other agents. Therefore we are against the deletion of this criterion and suggest to reword it: "Disinfections shall be used only where they are necessary in order to comply with legal hygiene requirements. If disinfectants are used, there shall be a disinfection plan stating the name of each disinfectant and the area where it is used as well as the correct amount and frequency of application."</i></p>	
<p>M25. Policy setting and environmental program</p>	<p>In relation to current criterion 25 on environmental management plan that was suggested to be removed, the majority of stakeholders suggested to retain it as EMAS/ISO is not always accessible to SMEs and as it is very important to have a environmental plan to better guide rest of criteria, set targets and monitor the improvement. After the AHWG2 JRC proposed at the EUEB to reintroduce the mandatory criterion, but to reword it in order to align it to the steps to undertake for EMAS registration, so that ultimately, if all steps are undertaken, the TAS could get EMAS too (and thus fulfilling the optional criterion).</p> <p><i>The criterion should remain as it is in the current decision. The different steps of EMAS are too complex to implement for TACS. Most of TACS are small structure. For example is difficult to carry an internal environmental audit. TACS don't have a dedicated person, with the necessary skills.</i></p> <p><i>We agree with the proposal provided the required system is simple enough and applicable even at the smallest accomodation providers (B&B).</i></p> <p><i>Aligning requirement to ISO/EMAS and following the same structure is a good idea. But a requirement of some level of environmental program should remain. It is necessary to have some buildt in improvement in the document.</i></p> <p><i>We are strictly against the deletion of this criterion! The environmental policy is an important means of communication as well to the guests as to the staff. It also makes the accommodation manager consider the meaning of the certificate and the position of its own business within. In addition the environmental programme helps to organize the implementation of the Ecolabel and to set reasonable targets for the future. This tool shall guarantee that the Ecolabel doesn't keep static after the certification but is an ongoing process of improvement. Therefore we suggest not only to keep this criterion but also to set it (and the whole chapter of "General Manangement") in the beginning of the criteria document.</i></p> <p><i>This criterion is part of the management section of the EU-Ecolabel besides staff-training and monitoring consumption data. Policy setting and an action programme are an important tool to keep and measure continuous improvement. Every tourist accommodation should oblige to use these tools for a continuous improvement in environmental actions. The policy and the environmental programme are also good tools to use for the staff training to get more involved in the topic of environmental protection and the system EU-Ecolabel. The environment programme could also include the recommendations of the planned internal energy audit, so you have one tool for all planned and taken actions in the field of EU-Ecolabel.←I suggest keeping this criterion and proposing an overall policy which also embraces topics from the proposed social mandatory criterion like</i></p>	<p>Accepted This criterion has been reintroduced.(See section 3.1.1)</p>

	<p><i>exploitation and harassment.</i></p> <p><i>General comment on criterion linked to general management: for me this part of the mandatory criteria should be the first of the document!</i></p> <p><i>This criterion should absolutely not be removed and should remain the same. First, it helps the owner to write its commitments and the actions implemented. Then, it is a good thing that the public can see it posted in the accommodation. Moreover the action plan is important to make the EU ecolabel live along the years. Questionnaire is also important to get the feedback of the guests.</i></p> <p><i>A mandatory environmental plan criterion that is not part of an environmental management system (EMS) checked by an accredited third party is not significant neither as mandatory nor as optional criterion.</i></p>	
<p>O43. Bioclimatic architecture</p>	<p>A stakeholder suggested to reintroduce it and better define bioclimatic architecture.</p> <p><i>NGO stakeholder hold the views that this criterion should be kept and further redefined. We fully support the general idea of the current criterion. However, we disagree with the definition proposed by the JRC. There are also variables such as the building process, the materials used, the building style, the natural breathing of the walls which that need to be taken into consideration in the definition.</i></p> <p><i>In addition, improving the definition and keeping bioclimatic architecture as a separate criterion is much more recommended than tackling only some very limited aspects in the criterion on the "building energy efficiency". Provisions on bioclimatic architecture go beyond the aspect of energy efficiency. For instance, bioclimatic architecture has a relation to health issues such as indoor air quality and potential hazardous emissions from the materials used.</i></p> <p><i>In addition, we suggest making the explanations of those principles clear and available in the "handbook" or user manual.</i></p> <p><i>We strongly support to keep this criterion. With bioclimatic architecture you can reach important saves of energy consumption. With a minimum inversion in the design and construction phase you reach relevant economic saves in the use phase. In addition of this, bioclimatic architecture supports indirectly traditional architecture that we think that it is important to put in value and to promote, as a signal of identity and because the traditional ways to build are usually very efficient in the energy point of view.</i></p> <p><i>In concrete, in Catalonia there are many rural farmhouse awarded with the EU Ecolabel that obtained punctuation in this point. These houses have a traditional architecture thought in the energy saving point of view. They have a good solar orientation, wide stone walls, etc. We agree that the verification documentation requirement that currently is included in the Commission Decision is not very clear. For that, we elaborated an application form that we sent to the applicants with a check list of bioclimatic solutions in the following areas: natural heating, natural lighting, natural cooling, noise,</i></p>	<p>See below</p> <p>Rejected</p> <p>With the aim being to simplify the criteria set and to focus on environmental hotspots, it is suggested that this criterion is removed as 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: efficiency and heat generation, air conditioning, energy efficiency of buildings, window insulation, etc.. In addition, the analysis carried out for 693 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the low impact criteria revealed a low fulfilment for this criterion compare to other optional criteria.</p>

	<p>building materials and landscape integration. Companies have to choose which ones they implemented in the accommodation service; they can also include other actuations. Applicants must have 6 bioclimatic measures implemented to receive 3 points. These measures should be documented. We always verify this in the verification visit.</p> <p>I know that TripAdvisor GreenLeader has a very interesting approach on this point... So maybe, instead of cancelling the criterion, it could be possible to reword it with the aim to be more precise (see example of TripAdvisor)</p>	
045. Hand driers with sensors	<p>A stakeholder suggested to retain the criterion as give the chance to applicant to score few points.</p> <p>We don't agree to remove it. It's a pity because some of TAS reached that criterion. It's important to leave some achievable criterion in order to obtain the minimum required</p> <p>I am not able to comprehensive agree to delete criteria to simplify the criteria set and focus on the environmental hotspots with a high environmental benefit. The tourist accommodation must be given more options and sometimes also easier implementable criteria. These criteria are also a motivating issue which should one keep in mind. A label needs applicants. I suggest keeping this criterion and accepting the first proposal for revised criterion.</p> <p>The environmental impact of this kind of hand drier needs to be studied regarding the impact of "disposable paper hand drier". Considering this point, it seems to be clear that this optional point has an important environmental impact..</p> <p>To be a little bit more stringent on the approach I would add the 100% green energy parameter on the criterion: "All electric hand (1point) and hait (1 pt) driers shall be fitted with proximity" sensors or have been awarded an ISO Type 1 eco-label and use 100% renewable energy sources"</p>	<p>Accepted</p> <p>This criterion has been reintroduced.(See section 3.7.9)</p>
046. Refrigerator positioning	<p>We don't agree to remove it. It's a pity because some of TAS reached that criterion. It's important to leave some achievable criterion in order to obtain the minimum required</p> <p>It's important to keep it because it's a quite easy to complete criterion. I don't really agree with BEMP : for ages, people try to keep the refrigerators far from hovens to avoid the transfert of heat.. Although it's not a "BEMP" this criterion can make the fridges live more time... so in a long term view... it create less waste... so there is not only an energetical issue!</p> <p>I think this criterion can be saved but maybe we can consider having a criterion more pedagogical... The fridges need to be:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Far away from hot sources like ovens <input checked="" type="checkbox"/> Stopped when they aren't used for a long period <input checked="" type="checkbox"/> Used for unfreezing aliments <input checked="" type="checkbox"/> Not used with hot aliments <p>Moreover the joint needs to be controlled regularly</p>	<p>Rejected</p> <p>This criterion is considered to be vague and with a very low environmental benefit associated. Although there is a high level of fulfilment its removal continues to be suggested.</p>
048. Sauna timer control	<p>We don't agree to remove it. It's a pity because some of TAS reached that criterion. It's important to leave some achievable criterion in order to obtain the minimum required</p>	<p>Rejected</p> <p>With the aim to simplify the criteria set and to focus on environmental hotspots it is suggested that this criterion is removed on the basis of its low environmental benefit and no specific BEMP</p>

		guidance sauna timer control.
	<i>I fully agree with this removal because this kind of equipment is found on almost every sauna available on the market... So it might be a very easy point to earn</i>	Accepted Removal proposal is kept
57. Tap water temperature and flow	<i>A stakeholder suggested to retain the criterion as give the chance to applicant to score few points.</i>	Accepted This criterion has been reintroduced.
	<i>We are against the deletion of this criterion as an easy and quick regulation of the water temperature helps to save energy and water (maybe even more than a simple limitation of the water flow as required in criterion 43) and in addition it raises the usability and comfort for guests. We therefore suggest to keep this criterion, maybe it shall be combined with criterion 43 as additional requirement.</i>	
	<i>This criterion should remain because it helps people to pay attention to this water waste.</i>	
058. Shower timers	<i>A stakeholder suggested to retain the criterion as give the chance to applicant to score few points.</i>	Rejected With the aim being to simplify the criteria set and to focus on environmental hotspots, 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/shower flow. In addition, the analysis carried out for 693 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the low impact criteria revealed a low fulfilment for this criterion compare to other optional criteria.
	<i>This criterion is very important for campsite with the aim to reduce the water consumption. In fact, the bigger problem we can find into the camp is when people say under the shower for a veryyyyyy long time. In fact when people are at home, they most of the time take a "normal" shower... it's the same on the mobilhomes and chalets... BUT in the collective facilities (like collective sanitary...) shower can easily reach 45 minutes... Maybe this criterion could be changed by something like "All showers in sanitary facilities/common areas shall have a specific system to avoid overtime showers" ... you've got the idea... I don't have the right wording</i>	
060. De-icing	<i>It was considered to be relevant in Nordic countries by one stakeholder. Another stakeholder mentioned that this is an easy point to score by applicant and that may be important for the image of the accommodation site.</i>	Accepted This criterion has been reintroduced. (See section 3.9.6)
	<i>We are against the deletion of this criterion. In Austria (and other winter-sport regions) there is need for de-icing and this is done under the responsibility of the TA very often. This criterion gives a clear guidance that there are better means and products available than using common salt products that can harm the environment.</i>	
	<i>We don't agree to remove it. It's a pity because some of TAS reached that criterion. It's important to leave some achievable criterion in order to obtain the minimum required. From the TAS point of view, it's an educational element for customers</i>	
	<i>For campsites deicing is a topic, even if the campsite is only open for the seasonal campers. The roads and walks have to be deiced in wintertime for the campers. The campsite owner is responsible for this. Nevertheless deicing is also a safety issue for every tourist accommodation. I suggest keeping this criterion for every tourist accommodation or addressing it just for campsites.</i>	
	<i>The criterion regarding deicing is quite important to my eyes. Not for southern countries but it's so important for northern or mountain countries. Maybe the wording can be specified with the aim to avoid southern countries to use the criterion (It's actually easy for me to say "I have only 2 days every 2 years of snow and when it snow, I don't deice because snow stays on the floor for 2 hours only..." on that case, I get the points too easily...)</i>	

	<p><i>I can be imagine a solution like "for TAS located in areas where snow can be found more than 10 days a year or nightly temperature can be under -5°C more than 20 days a year in average according to the national or local weather forecast company; mechanical means or sand/gravel shall be used in order to make roads on the TAS ground safe in case of ice/snow (1,5). If chemical de-icing is used, substance which do not contain more than 1% chloride ion (Cl-) (1 point) or de-icers that have been awarded the Community ecolabel or other national or regional ISO Type 1 Ecolabel (1,5 point) shall be used"</i></p> <p><i>It's an exemple... but I think that more stringency will be a good point regarding the impact of the criterion for cold-countries TAS</i></p>	
O63. Indigenous species outdoor planting	<p><i>We are against the deletion of this criterion as it is not only relevant for the water saving objective but it is one of the very few criteria of the ecolabel targeting the biodiversity issue. It shall also help to minimize the invasion of alien species. The following site can give additional guidance on plants that shall be avoided and shall be included into the user manual: www.europe-aliens.org</i></p> <p><i>We strongly oppose this deletion because this criterion is very relevant from an environmental and biodiversity point of view, although the term "indigenous" needs to be further defined for clarification. We propose to use the following definition: „plant species that can be found in the surrounding nature and are not specified as alien species“. This would refer to different geographic conditions such as north and south but takes also into account that vegetation differs with altitude. This specification excludes also invasive alien species.</i></p> <p><i>We don't agree to remove it. It's a pity because some of TAS reached that criterion. It's important to leave some achievable criterion in order to obtain the minimum required It's an element of biodiversity</i></p> <p><i>The reason to delete this criterion is not comprehensible. A listing of indigenous species is not to difficult to get, either from official authorities for a special region or from a gardener. I suggest keeping this criterion, also in the background of promoting biodiversity.</i></p> <p><i>It's important to keep this kind of criteria because the investment required to fulfil it is quite important. For stakeholders awarded, they could feel disappointed. Maybe It can be interesting to have a more specific wording on this criterion... speaking about shadow or flower planting to generate shadow... of having a better insulation... Maybe it can be interesting to reword it, but to keep it !</i></p> <p><i>We propose to keep this criterion. In Spain, drought is a very important environmental problem. Gardening has an important water consume that could you be reduced selecting indigenous species.</i></p> <p><i>The Bees House optional criteria</i></p> <p><i>I have forgotten to put the bee house in the optional criteria. It is a real an European stake (amazing mortality last winter of 50% to 70%), and non-professional bee keepers (less than 10 bee houses) are part of the solution to protect biodiversity and to sensitize consumers.</i></p>	<p>Accepted</p> <p>This criterion has been reintroduced.(See section 3.8.9)</p>
O65. Indoor and outdoor paints and varnishes	<p><i>We don't agree to remove it. It's a pity because some of TAS reached that criterion. It's important to leave some achievable criterion in order to obtain the minimum required. Paints have an important impact in the environment</i></p> <p><i>I keep thinking that the fact of promoting the other EE Ecolabels on the TAS and CSS document is important...</i></p> <p><i>Although you can delete this point, we have to continue the promotion of all the other EE Ecolabels (see my comment for new-criterion 65)</i></p>	<p>Rejected</p> <p>With the aim being to simplify the criteria set and to focus on environmental hotspots it is suggested that this criterion is removed on the basis of its low environmental benefit In addition, the analysis carried out for 693 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the low impact criteria revealed a low fulfilment for this criterion</p>

		compare to other optional criteria.
066. Car washing in special areas (campsite only)	<p><i>I am not able to agree to delete this campsite specific criterion to simplify the criteria set and focus on the environmental hotspots with a high environmental benefit. The campsite must be given some camping-specific options. Car washing is an important issue for campsites, especially in the sense of groundwater pollution.</i></p> <p><i>These criteria are also a motivating issue which should one keep in mind. A label needs applicants. I suggest keeping this criterion and accepting the first proposal for revised criterion.</i></p>	<p>Accepted</p> <p>This criterion has been reintroduced under the optional criterion on wastewater management.(See section 3.9.9)</p>
067. Alternative BBQ lighters	<p><i>We don't agree to remove it. It's a pity because some of TAS reached that criterion. It's important to leave some achievable criterion in order to obtain the minimum required</i></p> <p><i>I am not able to agree to delete this campsite specific criterion to simplify the criteria set and focus on the environmental hotspots with a high environmental benefit. The campsite must be given some camping-specific options. Barbecues are a fixed part of camping and therefore it is a quantitative environmental issue. Offering of alternatives to artificial barbecue lighters are also an awareness building tool for campers. I suggest keeping the criterion.</i></p> <p><i>This criterion seems to be really important! It is not a concern of environmental impact but a problem of image... Would you imagine having palm-trees on a EE Ecolabeled Campsite? No... It's the same idea I was writing on BATIS a few weeks ago: when you are awarded, you need to present a certain image to customers... Some double glazed windows and some "local species"... I spoke with Miss Cupidon and Mr Baumgartner from the BEUC a few weeks ago. To my opinion the wording of the criterion need to be changed.</i></p> <p><i>Instead of "Indigenous species", you could write "local species" (plants present in a region without human help). This criterion is important to consider... because of the image and because it make the owner of a TAS thinking of his action on flora</i></p> <p><i>Again, this is a "very" easy point for little CSS that can allow them to reach the minimum number of point. Of course, the environmental impact is ridiculous, this kind of point will allow new businesses think the EE is not an impossible label...</i></p> <p><i>This point gives me the opportunity to make a general comment (I already told it in Brussel): you have to define a strategy on the label. Would you like to have a label for "the best of the best of the best" TASS&CSS (what means 1% or 2% of the market) or would you like it to be known by European citizens. On that last case, you have to consider that if you don't have money for promoting a label (what seems to be the case...), it's important to develop the number of awarded business...</i></p> <p><i>If the European strategy is to have an elitist label... then there is no interest to be awarded except a kind of personal proudness... Keep thinking that one of our first goal is the development of our businesses (but we want to make it "greenly")...So if your answer on the strategy is the first point (elitist label...), I'll have to quit... there is no interest for me to keep paying between 750 and 1500€/year... I'll go to GreenKey: I'll have no inspection; I won't have an official label... But I'll pay less and I'll be part of a huge network... This huge network is the condition of developing the knowledge about the label... what make me come back to my point n°2: we need to keep the little criteria, which have a VERY LITTLE environmental impact but which allow the little TAS implementing the label...</i></p>	<p>Rejected</p> <p>With the aim being to simplify the criteria set and to focus on environmental hotspots, 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 barbecue lighters. In addition, the analysis carried out for 693 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the low impact criteria revealed a low fulfilment for this criterion.</p>
069. Mechanical cleaning	<p><i>We are against the deletion and suggest to keep the original wording. Carrying out all cleaning without the use of chemicals is too strict.</i></p> <p><i>We don't agree to remove it. It's a pity because some of TAS reached that criterion. It's important to</i></p>	<p>Accepted</p> <p>This criterion has been reintroduced under the optional criterion chemical use minimisation. (See section 3.9.5)</p>

	<i>leave some achievable criterion in order to obtain the minimum required. Mechanical cleaning is better than to use disinfectants</i>	
074. Fat/oil disposal	<i>We don't agree to remove all this criterion. It's a pity because some of TA reached that criterion. Keep at least the 2nd part of the current criterion "Proper disposal of own fat/oil is offered to guests (1 point)"</i>	Rejected With the aim being to simplify the criteria set and to focus on environmental hotspots, 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, the requirement is covered in the mandatory section. If local authorities collect this residue, the applicant must separate this according to mandatory criteria on waste separation.
085. Pick up service	<i>NGO stakeholder oppose the removal of the optional criterion 85 on pick-up services, stating: "The tourist accommodation shall offer guests travelling with transport a pick-up service at arrival via a car sharing or a collective transport scheme". The JRC justifies the removal by saying that this criterion on pick-up services will be covered under the current criterion 23 on Information to guests in the rearranged set of criteria. We disagree with this rationale as the criterion 23 does not provide any concrete measures, such as pick-up service, but is only about information. We agree to include this requirement in the criterion 23 in order to simplify the set of criteria, but ONLY IF the JRC keeps the criteria on pick-up and adds concrete requirements on public transport.</i> <i>The pickup service is something very important: the new document thinks about TAS well deserved by public transportation. I fully agree that the BEMP is the public transportation but if I take the case of the Blue Ocean, the nearest public transportation point is Ondres rail-station, at 1,5km from the camp... a pick-up service from the station to the camp by electric car (that my case) or an horse car is a really good opportunity to make guest discover our action from the very first contact with the TAS</i>	Partially accepted A requirement on pick up service has been included in the optional criterion environmentally preferable means of transport offer.
092. 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> AIR QUALITY <i>Option</i> <i>Reduce pollution source</i> <i>- In the countries Select only A+ decoration products in term of interior emissions label (revêtements de sol, mur ou plafond, les cloisons et faux plafonds, les produits d'isolation, les portes et fenêtres ainsi que les produits destinés à leur pose ou préparation)</i> <i>- Avoid chemicals usage and inform staff on forbidden products CMR (trichloroéthylène, du benzène, du phtalate de dibutyle et du phtalate de bis(2-éthylhexyle).</i> <i>- radon prevention in the risky zones</i> <i>Ventilate procedure</i> <i>- train the staff (10" ventilation of each bedroom when cleaning (shower-bath/cleaning products), cooking, drying of the linen etc...)</i> <i>- Plan of the cleaning of the VMC (written document: twice a year, revision every 3 year)</i> <i>Provide anallergic pillow and matelas protection</i> <i>No smoke</i> <i>No smoky products (perfumed candles or encens only organic natural oils ? without combustion</i>	Rejected With the aim being to simplify the criteria set and to focus on environmental hotspots it is suggested that this criterion is removed on the basis of its low environmental benefit Furthermore, there could be an overlap between criteria as EU Ecolabelled detergents, all purpose cleaners; etc... which are already addressed in other criteria. In addition, the analysis carried out for 693 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the low impact criteria revealed a low fulfilment for this criterion compare to other optional criteria.

O97. Additional environmental actions	<i>This criterion shall be kept in the document and not be deleted! It offers flexibility for applicants to get additional points and also highlights the certification with other ISO type I ecolabel. The final decision if points are granted for this criterion lies within the auditor and the competent body. So misuse and double-scoring can be limited.</i>	Accepted This criterion has been reintroduced and modified to cover additional social actions.(See section 3.10.8)
	<i>We don't agree to remove it. It's a pity because some of TAS reached that criterion. It's important to leave some achievable criterion in order to obtain the minimum required. We should have 3 points allocated for additional environmental actions and 3 points allocated on additional social actions: We have two proposals: we have one criterion called: Additional environmental and social actions or you have two criteria: Additional environmental actions & Additional Social actions. The idea is to introduce a social criterion and/or some optional social criteria. And at least to have one optional criterion "Additional social actions" that could promote social actions conducted by TAS. Some of these actions may be retained for future social criteria or environmental criteria at the next revision.</i>	
	<i>Keeping this criteria is a nice way to take notice of stakeholders interesting initiatives which could be integrate in the future referential. This could be specifying in the formulation to set the type of initiatives the auditor should retain.</i>	
	<i>This criterion should absolutely not be removed. The set of criteria is far from covering all the best practices we can appreciate in accommodations engaged. They must be rewarded for all the good ideas they have implemented in their accommodation.</i>	
	<i>I'm strongly, fully, against this removal!!! For 2 reasons : - It's only way for TAS to show what they are doing "better" than the criteria... this criterion is SO important because it's an opportunity to prove the involvement on the environmental process... moreover, some ideas found on this section can be mentions by CB to create, on the next revision process, some new optional/mandatory criteria. It's SO important to keep it ! - I'd go further on the criteria, allowing for example 3 points for environmental aspects and 2 more points for social aspects. As I told on Brussel, this criterion is like a "lab": if the CB give to the JRC the ideas found on the ground, it can be a VERY interesting source of ideas for the next revision in 2018 (or 19.. or after)... So I'm fully in favour of developing this criterion...</i>	

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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
EI	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 Existing EU Ecolabel criteria Tourist Accommodation/Campsite

The numeration used belongs to the campsite criteria as it is a more comprehensive product group. The numbering matches with Commission Decision 2009/564/EC.

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.

This criterion does not apply to tourist accommodations that have 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 case the tourist accommodation have no access to a market that offers energy from renewable energy sources, documentation demonstrating the request for renewable energy has to be supplied.

M 2: 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.

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, 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.

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 [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.

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.

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.

M6: 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.

M 7: 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).

M 8: 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.

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. 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.

M 10: 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.

M 11: 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.

M 12: 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.

M 13: 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.

M 14: 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.

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 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).

M 16: 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.

M 17: 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.

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 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

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 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.

M 20: 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).

M 21: 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.

M 22: 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.

M 23: 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.

M 24: 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.

M 25: 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.

M 26: 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.

M 27: 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.

M 28: 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.

'The term 'indoor area' should be specified more clearly. Does it include only guestrooms and common areas or even kitchen and conference facilities?' How should 'indoor area' be defined for this criterion?

M 29: 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.

M 30: 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.

O 31: Generation of electricity through renewable energy sources

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.

O 32: Energy from renewable energy sources

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.

O 33: Boiler energy efficiency

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.

O 34: Boiler NOx emissions

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.

O 35: District heating

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.

O 36: Combined heat and power — cogeneration

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.

O 37: Heat pump

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.

O 38: Heat recovery

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.

O 39: Thermoregulation

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

O 40: Energy performance audits for buildings

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.

O 41: Air conditioning

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.

O 42: Automatic switching-off of air conditioning and heating systems

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.

O 43: 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.

O 44: Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumblers 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.

O 45: 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.

O 46: 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.

O 47: 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.

O 48: 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.

O 49: 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.

O 50: 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.

O 51: 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.

O 54: 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.

O 55: 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.

O 56: 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.

O 57: 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.

O 58: 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.

O 59: 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.

O 60: 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.

O 61: 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.

O 62: 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.

O 63: 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.

O 64: 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.

O 65: 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.

O 66: 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.

O 67: 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.

O 68: 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.

O 69: 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.

O 70: 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.

O 71: 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 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.

O 72: 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.

O 73: 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.

O 74: 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.

O 75: 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.

0 76: 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.

0 77 (campsite only): Regulation of 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.

0 78 (campsite only): 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.

0 79 (campsite only): 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.

0 80 (campsite only): 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.

0 81: 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.

0 82: 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.

0 83: 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.

O 84: 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.

O 85: 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.

O 86: 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.

O 87: 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.

O 88: 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.

O 89: 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.

O 90: 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

0 91: 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.

0 92: 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.

0 93: 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.

0 94: 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.

0 95: 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.

0 96: 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).

O 97: 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.

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