

Revision of European Ecolabel Criteria for Tourist Accommodation and Campsite services

AHWG1



2. Political objectives of the EU Ecolabel and process description



- **IE** – Petten, The Netherlands
- *Institute for Energy*



- **IRMM** – Geel, Belgium
- *Institute for Reference Materials and Measurements*



- **ITU** – Karlsruhe, Germany
- Institute for Transuranium Elements*



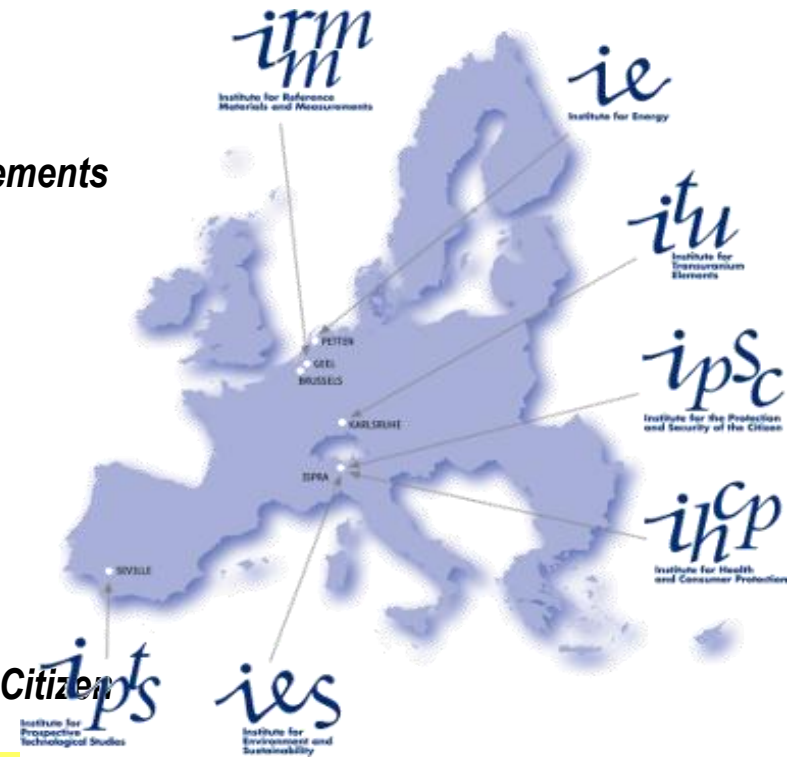
- **IES/ IHCP/ IPSC** – Ispra, Italy
- Institute for Environment and Sustainability*

- *Institute for Health and Consumer Protection*

Institute for the Protection and Security of the Citizen

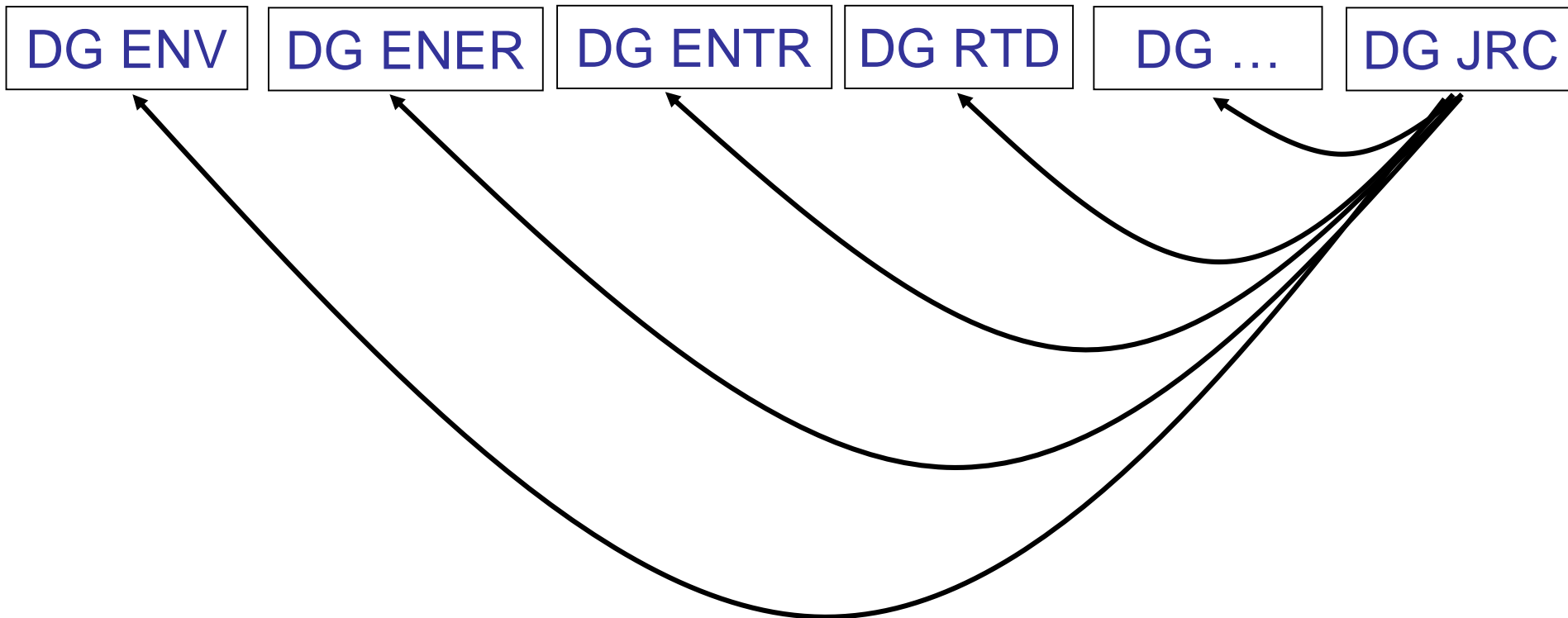


- **IPTS** – Sevilla, Spain
- *Institute for Prospective Technological Studies*



2. Political objectives of the EU Ecolabel and process description

Joint Research Centre in the context of the European Commission:



2. Political objectives of the EU Ecolabel and process description

Activities in support of Product Policy

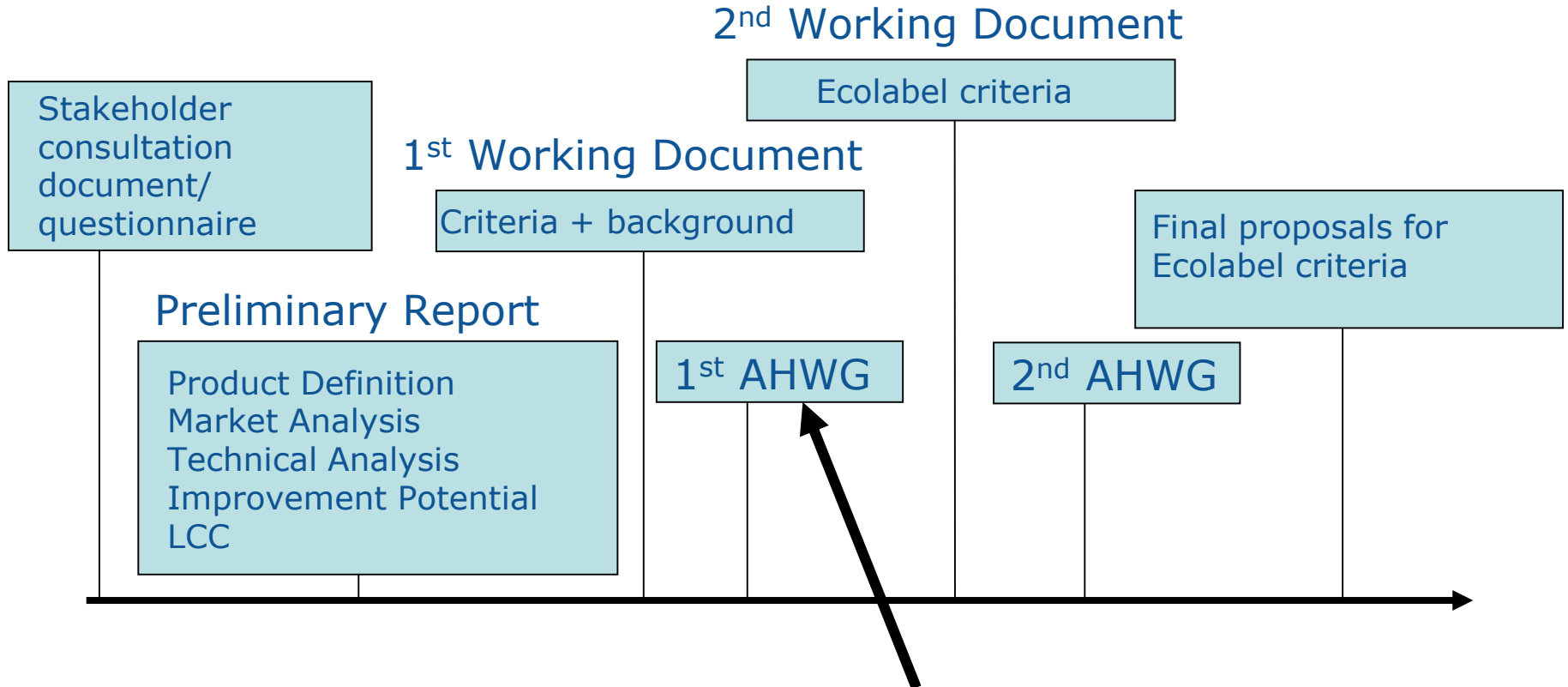
*IPTS supports the **development and implementation of Sustainable Product Policies**, among them the EU Ecolabel Regulation and the Green Public Procurement Communication.*

***Analysis of product groups** with focus on techno-economic and environmental aspects*

***Develop criteria** and implementing measures until the stage of voting in committee (resp. publication on GPP page)*

2. Political objectives of the EU Ecolabel and process description

Criteria development process





2. Political objectives of the EU Ecolabel and process description

Using the BATIS system

The screenshot displays the BATIS system interface, which is a web-based forum for the Joint Research Centre. The interface is divided into two main panels. The left panel shows a list of folders under the heading 'FORUMS'. The right panel shows a list of posts under the heading 'FORUMS'.

Left Panel: Folders

- Folder: Ad-Hoc Working Group (AHWG) meeting 1, 10th October 2013
- Folder: Ad-Hoc Working Group (AHWG) meeting 2, 12th May 2014
- Folder: Stakeholder comments: AHWG1 consultation round 12/09/13 - 24/10/13
- Folder: Stakeholder comments: AHWG2 consultation round 16/04/14- 04/07/14
- Folder: Stakeholder comments: EU GPP consultation round 30/04/14 - 13/06/14

Right Panel: Posts

Post	Creator	Creation date	Last update	Info
EU Ecolabel_Draft criteria legal text_criteria proposals v1	(nicholas.dodd)	16/04/2014 23:16	30/04/2014 10:35	
EU Ecolabel_Draft criteria legal text_preamble v1	(nicholas.dodd)	16/04/2014 23:16	30/04/2014 10:35	
EU Ecolabel_Hazardous substances criteria proposal_Revision v2	(nicholas.dodd)	29/04/2014 10:24	30/04/2014 10:35	
EU Ecolabel_Hazardous substances evidence matrix_Revision v2	(nicholas.dodd)	29/04/2014 10:25	30/04/2014 10:36	
EU Ecolabel_Hazardous substances_Sub-group meeting 26/02/14 minutes	(nicholas.dodd)	29/04/2014 10:26	30/04/2014 10:36	
EU Ecolabel_Technical background document, Revision 2	(nicholas.dodd)	16/04/2014 23:15	30/04/2014 10:35	
GPP Office IT Equipment_Revised criteria proposals_Version 1	(nicholas.dodd)	30/04/2014 10:33	30/04/2014 10:34	
GPP Office IT Equipment_Technical background and criteria proposals_Version 1	(nicholas.dodd)	30/04/2014 10:32	30/04/2014 10:34	

2. Political objectives of the EU Ecolabel and process description

1. Stakeholders can provide comments on technical report and separate draft criteria proposals for EU Ecolabel (before 28th November).
2. Comments need to be transmitted in the HTML version using online BATIS tool.
3. March 2015: EUEB progress report
6. 2nd AHWG meeting ~ 1st half 2015.
7. Process finalised 1st half 2016

3. Key results from the techno-economic and environmental analysis

Scope and definitions (Task 1 of preliminary report)

Other voluntary labelling schemes: Nordic swan, Malta Eco certification, Green Key, Travelife sustainability criteria, Global Sustainable Tourism Criteria.

Generally, definitions provided are broad.

NACE definitions: Hotels and similar accommodation (55.10), Holiday and other short-stay accommodation (55.20), Camping grounds, recreational vehicle parks and trailer parks (55.30).

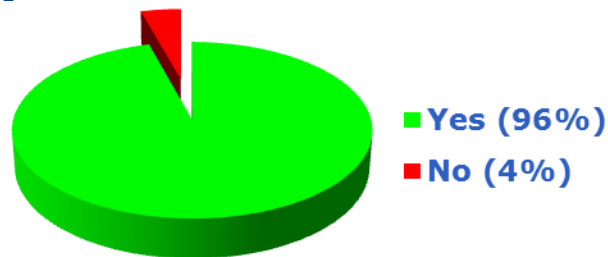
Where **more detailed** definitions (such as NACE codes) have been developed, these define tourist accommodation in a **similar way to the current EU Ecolabel criteria**.

3. Key results from the techno-economic and environmental analysis

Scope and definitions (Task 1 of preliminary report)

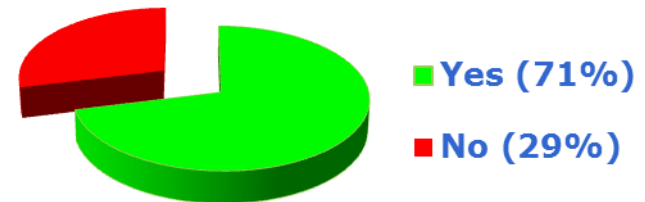
98 responses were received as part of the stakeholder questionnaire.

Do you agree with these existing definitions of scope?



Several respondents noted that conference rooms/training rooms should be included in the scope

Do you agree with **combining criteria for TAS and CSS under **“tourist accommodation”** PG?**



distinguish where specific criteria vary between TAS and CSS.

3. Key results from the techno-economic and environmental analysis

Scope and definitions (Task 1 of preliminary report)

Proposal for merged product group definition:

The product group “tourist accommodation” comprises:

The provision of tourist accommodation services and/or campsite services

Tourist accommodation services:

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

Campsite services:

The product group ‘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.

(...)

3. Key results from the techno-economic and environmental analysis

Scope and definitions (Task 1 of preliminary report)

(...)

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

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

3. Key results from the techno-economic and environmental analysis

Market analysis (Task 2 of preliminary report)

- Third largest economic activity in the EU. (3 million people by 300,000 enterprises, 380 billion in turnover in 2010).
- The market is dominated by hotels. Campsites account for a small proportion of the sector.
- High number of SMEs present in the market. These accounted for 20% of the European tourist labour force and for 30% of the turnover in the sector.

3. Key results from the techno-economic and environmental analysis

Market analysis (Task 2 of preliminary report)

- A Trip Advisor survey found that 77% responded they have environmentally friendly policies in place.
- The ten major European hotel chains have all shown a commitment towards reducing their environmental impact. (E.g. energy-efficient light bulbs and appliances, investments in renewable energy technologies, introduction of water-saving devices, increased recycling of waste and the use of eco-labelled products.)
- Best Western France and Austria are the only ones among the leading hotel chains choosing to use the EU Ecolabel.

Technical analysis (Task 3 of preliminary report)

EU Ecolabel aim (current criteria): (purchasing, provision of the service, waste)

- limit **energy** consumption,
- limit **water** consumption,
- limit **waste** production,
- favour the use of renewable resources and of substances which are less hazardous to the environment,
- promote environmental communication and education.

The BEMP report was particularly relevant:

1. Accommodation: **Water** consumption.
2. Accommodation: **Waste** generation.
3. Accommodation: **Energy** consumption.
4. Kitchens: Food sourcing, organic waste generation, water and energy consumption.
5. Campsites: Guest education, outdoor area management and energy and water consumption.

Technical analysis (Task 3 of preliminary report)

Electricity consumption during the operating phase as the major environmental impact of tourist accommodation.

LCA case studies placed a high emphasis on the impacts of transport and use of other services or suppliers (e.g. catering and laundry).

The key environmental impacts associated with tourist accommodation are:

- 1. Energy consumption,**
- 2. Water consumption,**
- 3. Waste generation**
- 4. Other services:** e.g. food provision and access to public transport

EU Ecolabel also includes criterion which facilitate improvements in these areas through, e.g.: data collection, policy setting, provision of information to guests and staff training.

- 5. General management:** e.g. staff training and data collection.

EU Ecolabel criteria will need to be revised or updated. and new criteria may need to be added to fill any gaps.

3. Key results from the techno-economic and environmental analysis

Improvement potential (Task 4 of preliminary report)

Energy use: regulatory changes.

Water use: proper management of the swimming pool backwashing process, in order to reduce water wastage.

Waste production: better reflect the waste hierarchy, i.e. waste prevention over waste management.

Social issues: it is proposed that a further social criterion is added, to align the EU Ecolabel with alternative eco-labels.

Quality issues: encourage guest feedback on the quality aspects of the tourist accommodation, not only environmental aspects.

3. Discussions: techno-economic and environmental analysis

Consultation points

Additional comments and suggestions concerning scope and definitions or other aspects from preliminary report are welcomed.

4. Current structure of criteria set and possible changes

Section A criteria

All the criteria in Section A must **be fulfilled**, if applicable.

Section B criteria

The criteria in Section B are **scored from 1 to 4 points each**, according to environmental effectiveness, consumer perception and technical/economic feasibility.

score a minimum of 20 points. (If the campsite offer other accommodations suitable for the provision of shelter to lodgers (24))

The total score required shall be increased by 3 points:

- food services (including breakfast)
- leisure/fitness activities (wellness centre 5 points, instead of 3).
- Green areas

4. Current structure of criteria set and possible changes

		Updated					No change	Removed			
		Regulation update	Due to stakeholder feedback	Due to BEMP	Due to new EU Ecolabel product group	Other		Regulation update	Due to stakeholder feedback	Due to BEMP	Other
1	Electricity from renewable sources	✓									
2	Coal and heavy oils										
3	Efficiency and heat generation	✓									
4	Air conditioning	✓									
5	Energy efficiency of buildings	✓									
6	Window insulation	✓	✓								
(...)											

Summary

✓ 51 updated
 ✓ 40 Unchanged
 ✓ 5 removed
 ✓ 3 additional new criteria

New criteria include:

Local food products (mandatory)	Made mandatory as a result of feedback requesting additional social criteria. This criterion prohibits the consumption of local endangered species.
Fundamental principles and rights at work (mandatory)	Added as a result of feedback requesting additional social criteria. This criterion ensures employment practices are aligned with International Labour Organisation (ILO) best practice.
Swimming pool backwashing (optional)	Added to optional water criterion, to align current swimming pool criteria with best environmental management practise. This criterion ensures an efficient swimming pool backwashing process is in place.

4. Current structure of criteria set and possible changes

Two scenarios:

A. limited access to product or services with national or international ISO Type I labels, energy efficiency certifications.

B. no means for high investments or interventions.

For TAS/CSS **with** all services:

☒ 31 for tourist accommodation

(**A**:55.5, **B**:34.5)

☒ 35 for campsites

(**A**:64.5, **B**:39.5)

For TAS/CSS **without** services:

☒ 20 for tourist accommodation

(**A**:42.5, **B**:22.5)

☒ 24 for campsites

(**A**:48.5, **B**:28.5)

21% of these points of total available (previously **20%**)

It is therefore proposed that current structure and scoring rules remain the same.

4. Discussions: current structure of criteria set and possible changes

Consultation points

Do you agree on keeping the current criteria structure and points allocation?

Should additional points be required in case of provision of conference services?

Consultation points

A stakeholder suggested to remove irrelevant criteria in order to simplify more the current set of criteria.

Should additional criteria be removed?

5. Revision of criteria and discussion: Mandatory and optional criteria related to Energy

1. Electricity from renewable sources
2. Coal and heavy oils
3. Efficiency and heat generation
4. Air conditioning
5. Energy efficiency of buildings
6. Window insulation
7. Switching off heating or air conditioning
8. Switching off lights
9. Energy efficient light bulbs
10. Outside heating appliances

31. Generation of electricity through renewable energy sources
32. Energy from renewable energy sources
33. Boiler energy efficiency
34. Boiler NOx emissions
35. District heating
36. Combined heat and power (cogeneration)
37. Heat pump
38. Heat recovery
39. Thermoregulation
40. Energy performance audits for buildings
41. Air conditioning
42. Automatic switching-off of air conditioning and heating systems
43. Bioclimatic architecture
44. Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumblers and office equipment
45. Electric hand and hair driers with proximity sensor
46. Refrigerator positioning
47. Automatic switching off lights in tourist accommodation
48. Sauna timer control
49. Swimming pool heating with renewable energy sources
50. Automatic switching off outside lights

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 1: Electricity from renewable sources

Current criterion:

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.

*A&V: 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.*

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 1: Electricity from renewable sources

Regulation: Directive **2001/77/EC was repealed by** Directive 2009/28/EC

Feedback: Criterion can be **difficult to achieve**, especially for small businesses.

BEMP: **“To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier.”**

Updated in line with the revised Directive, but otherwise no change is proposed.

Note, Optional criterion 31: Generation of electricity through renewable energy sources addresses the potential of tourist activities in generating energy

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 1: Electricity from renewable sources

Proposal for revised criterion:

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

This criterion does not apply (..)

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

In 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.

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 2: Coal and heavy oils

Current criterion:

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.

A&V: The applicant shall provide a declaration of compliance with this criterion, indicating the nature of the energy sources used.

Feedback: One comment suggested that zero sulphur content should be encouraged

The criterion is proposed to remain as current criterion.

5. Revision of criteria and discussion: Mandatory and optional criteria related to Energy

Criterion 3: Efficiency and heat generation

Current criterion:

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**.

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

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 3: Efficiency and heat generation

Regulation: Directive 2004/8/EC has been **repealed** by Directive 2012/27/EU .

A **new energy labelling** system for space heating, of A to G, will be introduced from September 2015 and A+ to F from September 2017.

Directive 92/42/EEC has been **repealed** by Directive 2009/125/EC with regard to **ecodesign requirements for space heaters and combination heaters using electricity, gas or liquid fuels**. (Regulation EU No 813/2013)

To consider **how the regulation affects** (1) *those tourist accommodation sites that meet the current criterion and have installed a 3 star boiler or equivalent, and* (2) *those tourist accommodation sites who install new boilers which comply with any updated labelling system.*

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 3: Efficiency and heat generation

Feedback:

- **Difficulties in complying** due to **costs in replacing boilers**.
- All boilers (including existing ones) should meet the criterion for **4 star** boilers.
- Suggestions that the efficiency measures for 3 star boilers should be specified as it is with 4 star boilers.

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

A new set of **EU Ecolabel criteria for water based heating systems/units** is about to be adopted (“seasonal space heating energy efficiency”). It is proposed to use this criterion.

Criterion 3: Efficiency and heat generation

Proposal for revised criterion:

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

<u>Heat Generator Technology</u>	<u>Minimum Seasonal Space Heating Efficiency</u>
<u>All heaters except solid biomass boiler heaters</u>	<u>ns ≥ 98% *</u>
<u>Solid biomass boiler heaters</u>	<u>ns ≥ 79%</u>

All heat pumps meet this efficiency. Pending to include an additional requirement on **Total Equivalent Warming Impact (TEWI) to these appliances.*

If a **new water heater** is installed within the duration of the eco-label award, the **efficiency of shall be of (A, A+, A++)**, measured according to Regulation EU No 811/2013 with regard to the energy labelling of water heaters, hot water storage tanks and packages of water heater and solar device.

Existing hot-water boilers (...)

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

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 4: Air conditioning

Current criterion:

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.*

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 4: Air conditioning

Regulation: Directive 2002/31/EC was **repealed**. **The minimum efficiency from 1 January 2014 will be A+. There will be two higher classes: A++ and A+++.** (Regulation No 626/2011)

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

The new energy classes for air conditioning were introduced in January 2013. Best products available on the market already exceed the energy efficiency threshold by 20%. (3 models A+++)(Topten.eu)

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 4: Air conditioning

Proposal for revised criterion:

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

(...)

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 5: Energy efficiency of buildings

Current criterion:

Energy efficiency of buildings

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

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

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 5: Energy efficiency of buildings

Regulation: Directive 2002/91/EC was **repealed**.

Feedback: **unsure about the verification** stages of this criterion; it was suggested that **examples of the types of documents** used.

User Manual: ***Further information about the energy efficiency of buildings (including energy audits) can be found at:***

http://ec.europa.eu/energy/efficiency/buildings/buildings_en.htm

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

BEMP: “*undertake an **energy audit and monitor energy consumption** across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficiency improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection*”. (**Criterion 40**: Energy performance audits for buildings)

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 5: Energy efficiency of buildings

Proposal for revised criterion:

Energy efficiency of buildings

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

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

5. Revision of criteria and discussion: Mandatory and optional criteria related to Energy

Criterion 6: Window insulation

Current criterion:

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**

*A&V: 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.*

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 6: Window insulation

Regulation: Directive 2002/91/EC and Council Directive 89/106/EEC were **repealed**.

Feedback:

- i. **'appropriate** degree of thermal insulation according to the local regulations and climatic conditions'. could be **more clearly outlined in the assessment and verification section**.
- ii. **Some buildings may be protected by local regulation**. Although currently reflected in the criterion as 'local regulations' – this could be **more clearly outlined in the assessment and verification section**.

BEMP: No specific guidance on window insulation, although **'good building insulation'** is stated as being necessary.



5. Revision of criteria and discussion: Mandatory and optional criteria related to Energy

Criterion 6: Window insulation

Proposal for revised criterion:

All windows in heated and/or air conditioned rooms (...)

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 2010/31/EU (Articles 4, 5, 6 and 7) and Regulation (EU) No 305/2011 and relative national technical regulations for their implementation.

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

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

(...)



5. Revision of criteria and discussion: Mandatory and optional criteria related to Energy

(...)

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

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

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

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

d. in case of rooms and areas **added or renovated** after the acquisition of the EU Eco-label, provide the Competent Body with proof of **compliance with Directive 2010/31/EU (Articles 4, 5, 6 and 7) and Regulation (EU) No 305/2011 1**

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 7: Switching off heating or air conditioning

Current criterion:

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.

*A&V: The applicant shall provide a **declaration of compliance** with this criterion, together with the **text of the information to guests** (if applicable).*

- i. **Better clarification of what easily available information.**
- ii. BEMP focuses primarily on energy efficiency (covered in Criterion 4: air conditioning). However, BEMP also **outlines that information should be provided to guests.**

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 8: Switching off lights

Current criterion:

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**.

A&V: The applicant shall provide a declaration of compliance with this criterion, together with the information procedures.

1. BEMP analysis relates to managing the lightings :
 - To “install **zoned** and appropriately sized compact fluorescent and LED lighting with **intelligent control** based on motion, natural-light and time.”
 - “for all rooms and corridor areas to have **intelligent lighting control**. For small enterprises **where automatic lighting control in rooms may not be practical**, the best practice is to install appropriately positioned signs **reminding guests to switch off lights (as required in EU Flower criteria for accommodation: EC, 2009)**.”

(Criterion 47: automatic switching off lights in rooms, and Criterion 50: automatic switching off outside lights.)

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 9: Energy efficient light bulbs

Current criterion:

(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.*

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 9: Energy efficient light bulbs

Regulation: Directive 98/11/EC was **repealed**.

Feedback: Major concerns were:

- The **cost of replacing light bulbs**.
- Timings related to changing a large number of light bulbs.
- **Difficulties in assessing criteria**.
- Whether **LED lights** adhere to this criterion.
- A **number of respondents suggest that a phase-in period** should be stated for this criterion so that existing light bulbs **don't have to be disposed of until necessary**.

BEMP: ***"To install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control"***

EU Ecolabel criteria for the management of lighting are in place, including: Criterion 8: switching off lights, Criterion 47: automatic switching off lights in rooms, and Criterion 50: automatic switching off outside lights.

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 9: Energy efficient light bulbs

Proposal for revised criterion:

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

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

At the end of **Year 1:**

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

This does not apply to light fittings

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

(...)

(...)

At the end of **Year 2**:

- a) At least 80% of all light bulbs in the tourist accommodation shall have an energy efficiency of Class A as defined in Commission Delegated Regulation (EU) No 874/2012. This does not apply
- (b) 100% of light bulbs that are situated where they are likely to be turned on for more than five hours a day shall have an energy efficiency of Class A as defined by Commission Delegated Regulation (EU) No 874/2012. This does not apply ...

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

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

5. Revision of criteria and discussion: Mandatory and optional criteria related to **Energy**

Criterion 10: Outside heating appliances

Current criterion:

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

*A&V: 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.*

Feedback: **Opinions varied.** Should be banned. In **colder regions outdoor heating may be required to meet certain quality standards.** Other respondents argued that the **same energy source is used for indoor and outdoor appliances.**

A distinction can be made between those heating appliances which are 'stand-alone' (e.g. a biomass) and those which use mains electricity.



Criterion 10: Outside heating appliances

Proposal for revised criterion, **Option 1:**

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

A&V: The only outside heating appliances which may be used must be:

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

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

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

Proposal for revised criterion, **Option 2:**

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

A&V: The applicant shall provide a declaration of compliance with this criterion.

5. Discussions: Mandatory criteria related to Energy

Criterion 1: Electricity from renewable sources

Stakeholder comment: *The meaning of ‘no access to a market’ should be specified. Does this refer to a national market?’*

‘This may be a problem in the case of islands, where renewable sources may available on the national market but not on the specific island. (e.g. Guadeloupe). Would this be considered as ‘no access’ or would the French market be taken into account?’

How should ‘no access to a market’ be defined?

Stakeholder comment: *‘First and only pan-European ecolabel for electricity: EKOenergy is a young network of 34 environmental NGOs from 26 European countries. We focus on the promotion of green electricity.*

“The EKOenergy electricity certification scheme represents the best available pan-European option for the sustainable and additional consumption of renewable electricity within Europe”.

Should it be possible (or be encouraged) to refer to ecolabelled electricity?

Criterion 1: Electricity from renewable sources

LCA case study: The author claims that this criterion does not take into account the potential for tourist activities to generate energy (i.e., solar or wind energy) by themselves, or in cooperation with other organisations. [C. De Camillis. et al (2010a)]

Note, Optional criterion 31: Generation of electricity through renewable energy sources addresses the potential of tourist activities in generating energy.) **Should the self-generation of energy be addressed in mandatory criteria 1: Electricity from renewable sources?**

Criterion 2: Coal and heavy oils

It appears that some European countries are moving to lower sulphur grade heating oil. There seems to be suppliers of 50 ppm (0.005%) S content heating oil and even lower grades. [Christian Küchen (2010)]

Stakeholders are invited to provide additional information concerning to the access to low sulphur grade heating oil supply.

Criterion 3: Efficiency and heat generation

Stakeholder comment: *'It would be useful to add wood boilers, because they are increasingly used in France and the efficiency can also be calculated.'*

Should wood boilers be included in this criterion?

Criterion 9: Energy efficient light bulbs

Stakeholder comment: *'Is it a requirement that Competent Bodies verify compliance with this criterion after two years? If so, this complicates the role of the Competent Body.'*

Is it a requirement that Competent Bodies verify compliance with this criterion after two years or is the declaration of conformity sufficient?

Criterion 10: Outside heating appliances

Two options have been proposed for this criterion:

1. Allow outside heating appliances which are powered by renewable energy.
2. Ban all outside heating appliances.

Which option is preferred?

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 31: Generation of electricity through renewable energy sources (up to 4 points)

Current criterion:

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).

*A&V: 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.*

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 31: Generation of electricity through renewable energy sources (up to 4 points)

Feedback: there is some confusion as to how this optional criterion differs from Criterion 1: electricity from renewable sources.

difficulties in achieving 20% consumption per year. It was also suggested that more points should be awarded to this criterion according to the investment made.

BEMP: “install **on-site geothermal, solar or wind energy generation where appropriate**, and to **procure electricity** from a genuine (verifiable additional) **renewable electricity supplier**”.

This criterion (unlike Criterion 1) refers specifically to on-site generation carried out by the tourist accommodation. This should be clarified in the criterion.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 31: Generation of electricity through renewable energy sources (up to 4 points)

Proposal for revised criterion:

Generation of electricity by the tourist accommodation through renewable energy sources (up to 4 points)

The tourist accommodation shall have on site renewable energy generation, which may include: photovoltaic (solar panel) or local hydroelectric system, geothermal, biomass or wind power electricity generation, that supplies or will supply:

a) at least 10% of the overall electricity consumption per year (2 points).

or

b) at least 20% of the overall electricity consumption per year (4 points).

A&V: The applicant shall provide a declaration of compliance (...)

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 32: Energy from renewable energy sources (up to 2 points)

Current criterion:

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).

*A&V: 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.*

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 32: Energy from renewable energy sources (up to 2 points)

Feedback:

No stakeholder feedback was received for this criterion.

BEMP: “**on-site geothermal, solar or wind energy generation where appropriate**” and through procurement of “electricity from genuine (verifiable additional) **renewable electricity supplier**.” This is in line with the current EU Ecolabel criterion.

Proposal for revised criterion:

At least 70% of the total energy used by the tourist accommodation for **all purposes** shall come from renewable energy sources. (1.5 points, 2 points for 100% of the tourist accommodation’s energy used for that purpose, coming from renewable energy sources).

A&V: (...)

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 33: Boiler energy efficiency (1.5 points)

Current criterion:

The tourist accommodation **shall have a 4 star boiler(s)** as defined by Directive 92/42/EEC.

*A&V: The applicant shall provide a **declaration of compliance** with this criterion, together with adequate **documentation**.*

Feedback: Should be brought into line with existing ISO-Type 1 eco-labels.

- the EU Ecolabel criterion for water based space heaters
- Blue Angel for gas and oil heaters
- Austrian Ecolabel for Wood-Fired Heating Systems.

BEMP: to install the most efficient HVAC systems.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 33: Boiler energy efficiency

Proposal for revised criterion:

Water Based Space Heaters energy efficiency (1.5 points)

The water based heating system/unit shall have been awarded an EU Ecolabel licence in accordance with Commission Decision of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters (2014/314/EU) or other ISO Type 1 eco-labels.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a copy of the Ecolabel or other ISO Type 1 eco-labels certificate.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 34: Boiler NO_x emissions

Current criterion:

Boiler NO_x emissions (1.5 points)

The **boiler(s) shall be class 5** of the EN 297 prA3 **norm regulating NO_x emissions**, and shall **emit less than 60 mg NO_x/kWh** (gas condensing boilers) or **70 mg NO_x/kWh** (non-condensing gas boilers up to nominal output of 120 kW).

*A&V: The applicant shall provide a **declaration of compliance** with this criterion, together with a **report or technical specifications** from the **professional technicians** responsible for the sale and/or maintenance of the boiler.*

Feedback: Criterion should be updated to include a more general definition which comprises other types of heaters (for example biomass).

BEMP: There is **no specific BEMP guidance for setting limits for boiler NO_x emissions**. However, **regular maintenance of all HVAC equipment is encouraged**.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to Energy

Criterion 34: Boiler NOx emissions

Proposal for revised criterion:

Water Based Space Heater NOx emissions (1.5 points)

The nitrogen oxide (NOx) content of the exhaust gas shall not exceed the limit values indicated in the table below (not applicable to electrical heaters):

Heat generator technology	NOx emission limit
Gas heaters	Equipped with internal combustion engine: 170 mg/kWh GCV energy input Equipped with external combustion: 36 mg/kWh GCV energy input
Liquid fuel heaters	Equipped with internal combustion engine: 380 mg/kWh GCV energy input Equipped with external combustion: 100 mg/kWh GCV energy input
Solid fuel heaters	150 mg/Nm ³ at 10% O ₂

A&V: The applicant shall provide a report or technical specifications from the professional technicians responsible for the sale and/or maintenance of the water based space heater. The calculation shall be in accordance with Appendix 1 of Commission Decision of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 35: District heating (1.5 points)

Current criterion:

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.

*A&V: The applicant shall provide a **declaration of compliance** with this criterion, together with **documentation** showing connection to the district heating.*

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 35: District heating

Regulation: Directive 2004/8/EC was repealed. However, the definition for ‘high efficiency cogeneration units’ remains unchanged. Commission Decision 2007/74/EC was repealed. Harmonised efficiency reference values for separate production of heat remain unchanged.

Feedback: Option “use of industrial waste heat” could be added.

BEMP: BEMP does **not cite specific requirement for district heating**; rather that all heating/cooling systems should be **efficient and appropriate** for the tourist accommodation – this is specified in the existing criterion.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 35: District heating

Proposal for revised criterion:

District heating (1.5 points)

The heating of the tourist accommodation shall be provided by efficient district heating. For the purposes of the EU Ecolabel this is defined as follows.

Generation of heat either by high efficiency cogeneration units as defined by Directive 2012/27/EU and any other Commission instruments adopted in application of that Directive, or by heat only boilers with an efficiency that matches or surpasses the applicable reference value established by Commission Decision 2011/877/EU.

(...)

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 36: Combined heat and power — cogeneration

Current criterion:

Combined heat and power — cogeneration (1.5 points)

Electricity and heating of the **sanitary facilities, common areas and rental accommodation** shall be provided by a **high efficiency cogeneration unit** according to Directive 2004/8/EC. If the tourist accommodation service has such cogeneration unit on site **its output of heat and electricity** shall supply at **least 70%** of the total heat and electricity consumption on site. The supply shall be calculated in accordance with the methodology provided by Directive 2004/8/EC.

*A&V: The applicant shall provide a **declaration of compliance** with this criterion, together with **documentation** on the combined heat and power plant.*

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 36: Combined heat and power — cogeneration

Regulation:

Directive 2004/8/EC was repealed by Directive 2012/27/EU. However, there has been no change in definition, criteria or methodology.

The methodology for detailed in Directive 2004/8/EC which must be used to calculate the heat and energy supply from the cogeneration unit is also unchanged in Directive 2012/27/EU.

BEMP: Best practice efficiency ratings for combined heat and power units are **not specifically outlined in BEMP**.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 36: Combined heat and power — cogeneration

Proposal for revised criterion:

Combined heat and power — cogeneration (1.5 points)

Electricity and heating of the sanitary facilities, common areas and rental accommodation shall be provided by a high efficiency cogeneration unit according to Directive 2012/27/EU. If the tourist accommodation service has such cogeneration unit on site its output of heat and electricity shall supply at least 70% of the total heat and electricity consumption on site. . The supply shall be calculated in accordance with the methodology provided by Directive 2012/27/EU.

(...)

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 37: Heat pump

Current criterion:

Heat pump (up to 2 points)

The tourist accommodation shall have a **heat pump providing heat and/or air conditioning** (1.5 points). The tourist accommodation shall have a heat pump with the **Community eco-label or another ISO Type I eco-label** (2 points).

*Assessment and verification: The applicant shall provide a **declaration of compliance** with this criterion, together with **documentation** on the heat pump.*

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 37: Heat pump

Feedback: No feedback was received for this criterion.

BEMP: Heat pumps can be beneficial for reducing energy consumption. However, no best practice efficiency ratings are suggested, instead BEMP recommends the installation of “efficient (e.g. ecolabelled) heat pumps for heating and cooling, or where possible ground water cooling”.

Proposed update:

It has been proposed that Criterion 33 should be expanded from the energy efficiency of ‘boilers’ to ‘water based space heaters’. Heat pumps are included within the scope of this updated Criterion 33.

This criterion should be removed.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 38: Heat recovery

Current criterion:

Heat recovery (up to 1.5 points)

The tourist accommodation shall have a **heat recovery system for 1** (1 point) or **2** (1.5 points) of the following categories: **refrigeration systems, ventilators, washing machines, dishwashers, swimming pool(s), sanitary waste water.**

*A&V: The applicant shall provide a **declaration of compliance** with this criterion, together with **documentation** on the heat recovery systems.*

No stakeholder feedback was received for this criterion.

BEMP is to encourage the installation of heat recovery systems where possible – as encouraged in the current EU Ecolabel criterion.

The criterion is proposed to remain as current criterion.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 39: Thermoregulation

Current criterion:

Thermoregulation (1.5 points)

The **temperature** in every **common area** and rental accommodation shall be **individually regulated**.

*A&V: The applicant shall provide a **declaration of compliance** with this criterion, together with **documentation on the thermoregulatory systems***

Proposal for revised criterion:

Thermoregulation (1.5 points)

The temperature in every common area (for example restaurants, lounge areas, and conference rooms) and guest accommodation shall be individually regulated in order to meet the needs of the guests whilst also ensuring energy efficiency.

A&V: (...)

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 40: Energy performance audits for buildings

Current criterion:

Energy performance audits for buildings (1.5 points)

The tourist accommodation service shall be subject to a **biannual energy performance audit** by an independent expert and **implement at least two recommendations** on improving the energy performance resulting from the audit.

*Assessment and verification: the applicant shall provide the **energy performance audit report** and provide detailed documentation on how the tourist accommodation has fulfilled this criterion.*

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 40: Energy performance audits for buildings

Feedback:

- Suggestion that audits should be undertaken less often.
- **More points** should be awarded for this criterion as fulfilling this can be **costly**.

BEMP: “Ensure that new buildings are compliant with the highest achievable energy ratings, as indicated by conformance with PassiveHouse and Minergie P standards, and that existing buildings are retrofitted to minimise heating and cooling energy requirements.”

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 40: Energy performance audits for buildings

The new-build Passivhaus Standard requires:

- a **maximum space heating and cooling demand** of less than 15 kWh/m².year or a maximum heating and cooling load of 10W/m²
- a maximum total primary **energy demand** of 120 kWh/m²/year
- an **air change rate** of no more than 0.6 air changes per hour @ 50 Pa

The Passivhaus refurbishment standard, EnerPHit, requires:

- a **maximum space heating and cooling demand** of less than 25 kWh/m².year or a maximum heating and cooling load of 10W/m²
- a maximum **total primary energy demand** of 120 kWh/m²/year + heat load factor
- an **air change rate** of no more than 1.0 air changes per hour @ 50 Pa

25,000 such certified structures of all types in Europe

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 40: Energy performance audits for buildings

Proposal for revised criterion:

Energy performance audits for buildings (1.5 points)

The tourist accommodation shall be subject to an **annual energy performance** audit by an independent expert and implement at least two recommendations on improving the energy performance resulting from the audit.

OR

The tourist accommodation has been certified to **PassivHaus or Minergie P standards**.

Assessment and verification: (...). Documents relative to PassivHaus or Minergie P standards should be provided.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 41: Air conditioning (up to 2 points)

Current criterion:

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.

*A&V: The applicant shall provide **relevant documentation** showing compliance with the criterion.*

Directive 2002/31/EC was repealed. New directive introduces energy efficiency classes A+ to A+++.



Criterion 41: Air conditioning (2 points)

BEMP: air conditioning systems should be **energy efficient**, properly maintained and appropriately used.

The current criterion ensures that the system used is efficient. Additional EU Ecolabel criteria are also applicable here: Criterion 23: maintenance and servicing of boilers and air conditioning systems; and Criterion 26: information to guests.

Proposal for revised criterion:

All household air conditioner in the tourist accommodation have an energy efficiency 15% higher than the threshold to qualify for the **most energy efficient class as laid down in Regulation 2011/626/EU supplementing Directive 2010/30/EU [OJ L 178, 4.5.2011, p.1] with regard to energy labelling of air conditioners or have corresponding energy efficiency.**

(...)

*A&V: 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.*

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

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

Current criterion:

Automatic switching-off of air conditioning and heating systems (1.5 points)

There shall be an **automatic system** that **turns off the air conditioning and heating** of tourist accommodation when **windows are open**.

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

1. Outline that this can be costly for tourist accommodation.
2. BEMP: Generally, automatic switching off of heating and cooling systems is encouraged as a method of saving energy.

The criterion is proposed **remain as current criterion**.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 43: Bioclimatic architecture (3 points)

Current criterion:

Buildings on the tourist accommodation ground shall **be built according to bioclimatic architectural principles**.

A&V: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate documentation.

BEMP: “ensure that new buildings are compliant with the highest achievable energy ratings, as indicated by conformance with PassivHaus and Minergie P standards...”

- *Criterion 3: efficiency and heat generation*
- *Criterion 4: air conditioning*
- *Criterion 5: energy efficiency of buildings*
- *Criterion 6: window insulation.*
- *Criterion 40: energy performance audits for buildings, refer directly to PassiveHouse and Minergie P standards.*

It is proposed that this criterion is removed.

Criterion 44: Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumblers ...(maximum of 3 points)

Current criterion:

(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.

(f) (1 point): All electric tumble driers shall be class A energy efficiency as laid down in Commission Directive 95/13/EC (6).

Assessment and verification: The applicant shall provide documentation indicating the energy class of all electric tumble driers.

Note: The criterion does not apply to electric tumble driers not covered by Directive 95/13/EC (e.g. industrial tumble driers).

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

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

Regulation:

(a: refrigerators) Commission Directive 94/2/EC was **repealed**.

(b: electric ovens) Commission Directive 2002/40/EC is currently in force but will be repealed in January 2015.

(c: dishwashers, d: washing machines, f: tumble driers) Commission Directive 97/17/EC, 95/12/EC and 95/13/EC were **repealed**.

(e: office equipment) No changes in legislation.

Feedback: Consideration of the new energy efficiency class A+++ for different devices (in line with new regulation, outlined above).

- The possibility of including requirements for industrial appliances.

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

BEMP “select **efficient cooking equipment**, including induction-hob or pot-sensor-controlled gas ovens, **efficient refrigeration equipment** that uses a natural refrigerant such as ammonia or carbon dioxide, and to control ventilation according to demand.”

The market share throughout the region is of **15% for the highest energy class** and 19% for A++ appliances out of all appliances sold between January and February 2014.

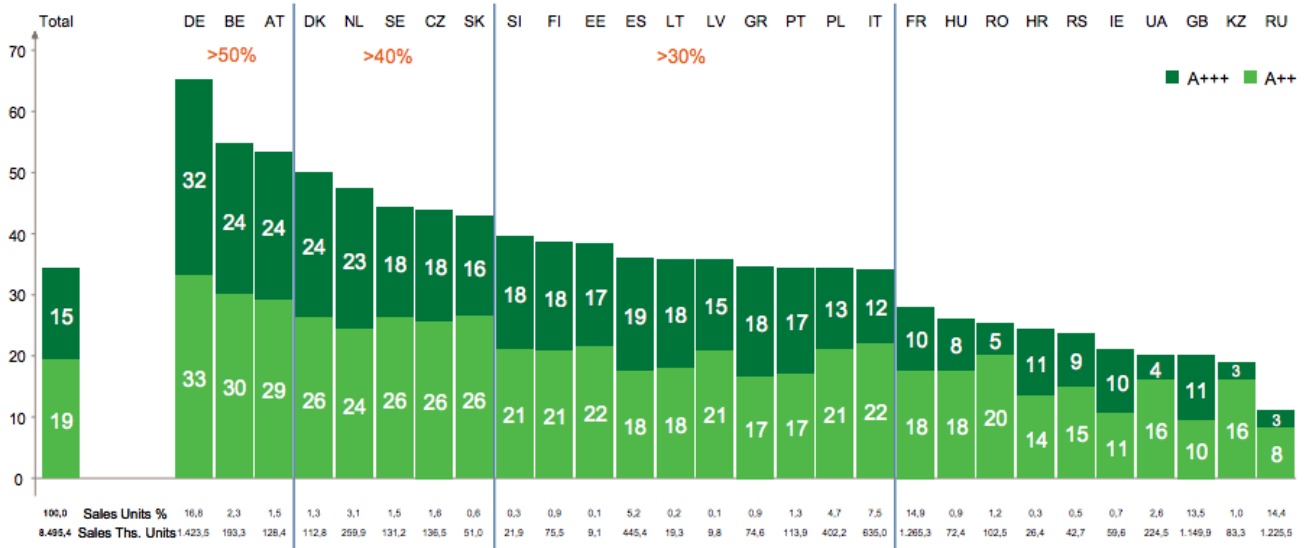


Figure 1: Sales unit share by energy efficiency class, by country, January to February 2014 (Source: GFK (2014))

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

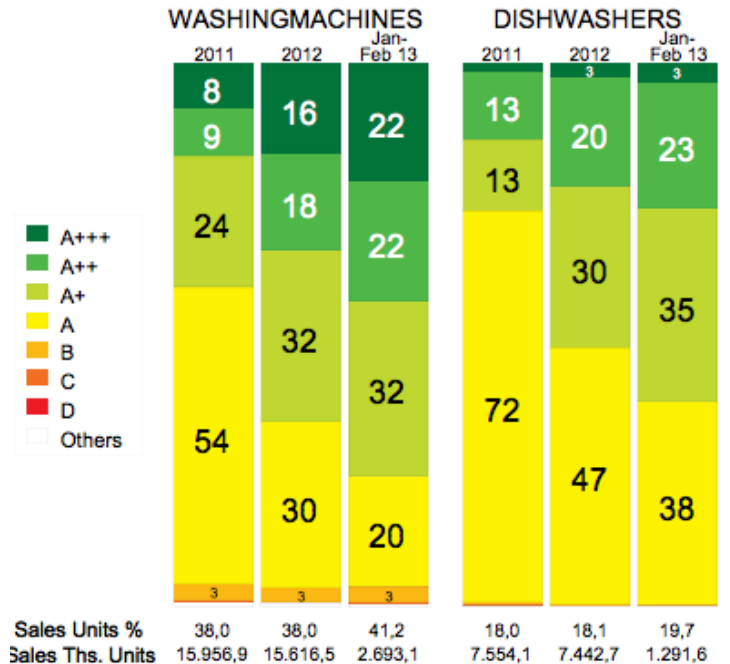


Figure 2: Sales of washing machines and dishwashers appliances in 23 European countries (Source: GFK (2013))

Washing machines exhibit the greatest move towards products with the lowest use of energy. The A+++ energy class reached 22% at the start of 2013.

Dishwashers have experienced a lower move towards higher energy efficient products. Eleven A+++ classed dishwashers were listed on Topten.eu in June 2014, in addition to eight A++ products.

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

Refrigerators. According to GFK data the market penetration of the top two energy classes reached 18% at the start of 2013. Topten.eu reports that a large number of A+++ refrigerator models are available on the market.

Freezers experienced larger market penetration, with a combined market share of 24% for A++ and A+++ products.

Tumble driers. According to topten.eu, by the end of 2013 there were 17 different models with class A++ and five that reached class A+++.

Electric ovens The new Directive introducing A++ and A+++ energy classes will be coming into force in 2015 therefore information on the market penetration of these appliances is not available.

Proposal for revised criterion:

Energy efficient refrigerators (1 point), ovens (1 point) dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (maximum of 3 points)

(a) (1 point): All household **refrigerators shall be of class A+++ energy** efficiency according to Commission Delegated Regulation (EU) No 1060/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the refrigerators and frigo or mini-bars.

(b) (1 point): All household **electric ovens shall be of class A+++ energy** efficiency as laid down in Commission Delegated Regulation (EU) No 65/2014.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the household electric ovens.

Note: The criterion does not apply to ovens not operated with electric energy or otherwise not covered by Commission Delegated Regulation (EU) No 65/2014 (e.g. industrial ovens).

(...)

(...)

(c) (1 point): All household **dishwashers shall be of class A+++** energy efficiency as laid down in Commission Delegated Regulation (EU) No 1059/2010.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the dishwashers.

Note: The criterion does not apply to dishwashers not covered by Commission Delegated Regulation (EU) No 1059/2010 (e.g. industrial dishwashers).

(d) (1 point): All household **washing machines shall be of class A+++** energy efficiency as laid down in Commission Delegated Regulation (EU) No 1061/2010)

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the washing machines.

Note: The criterion does not apply to washing machines not covered by Commission Delegated Regulation (EU) No 1061/2010 (e.g. industrial washing machines).

(...)

(...)

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the washing machines.

Note: The criterion does not apply to washing machines not covered by Commission Delegated Regulation (EU) No 1061/2010 (e.g. industrial washing machines).

(e) (1 point): At least 80% of office equipment (...)

(f) (1 point): All electric **tumble driers shall be class A+++** energy efficiency as laid down in Commission Delegated Regulation (EU) No 392/2012.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all electric tumble driers.

Note: The criterion does not apply to electric tumble driers not covered by Commission Delegated Regulation (EU) No 392/2012 (e.g. industrial tumble driers).

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 45: Electric hand and hair driers with proximity sensor

Current criterion:

Electric hand and hair driers with proximity sensor (up to 2 points)

All **electric hand** (1 point) and **hair** (1 point) **driers** shall be fitted with **proximity sensors** or have been awarded an **ISO Type I eco-label**.

A&V: The applicant shall provide appropriate supporting documentation of how the tourist accommodation fulfils this criterion.

Feedback: Hairdryers are more commonly fitted with 'push buttons' than proximity sensors.

BEMP: There **is no BEMP specifically for hand and hair dryers**.

May not be significant impact in a large hotel. However, the use of proximity sensors can be assumed to be preferable to push button driers – once these are pressed they will run according to a timer.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 45: Electric hand and hair driers with proximity sensor

Proposal for revised criterion:

Electric hand driers with proximity sensor (1 point)

All electric hand driers shall be fitted with proximity sensors, or have been awarded an ISO Type I eco-label.

Assessment and verification: (...)

Hair driers are proposed to be removed from this criterion, as they do not typically operate via proximity sensor.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 46: Refrigerator positioning

Current criterion:

Refrigerator positioning (1 point)

The **kitchen, kiosk and shop refrigerator(s)** shall be positioned and regulated according to **energy saving principles**, in order to reduce energy waste.

*A&V: The applicant shall provide a **detailed explanation** of how the tourist accommodation fulfils this criterion.*

BEMP: Only general information on the preference for energy efficient equipment and its maintenance.

Current User Manual :

“At least two of the following energy saving principles shall be respected:

- 1. the refrigerator is far from or shielded from sources of heat, such as the oven;*
- 2. the cooling tubes of the refrigerator are well cleaned on a regular basis;*
- 3. there are precise procedures to open the refrigerator as few times as possible.”*

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 46: Refrigerator positioning

Proposal for revised criterion:

Refrigerator positioning (1 point)

The kitchen, kiosk and shop refrigerator(s) shall be positioned and regulated according to energy saving principles, in order to reduce energy waste.

At least two of the following energy saving principles shall be respected:

1. the refrigerator is far from or shielded from sources of heat, such as the oven;
2. the cooling tubes of the refrigerator are well cleaned on a regular basis;
3. there are precise procedures to open the refrigerator as few times as possible.

A&V: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, including which actions are followed.



Criterion 47: Automatic switching off lights in tourist accommodation

Current criterion:

Automatic switching off lights in tourist accommodation (1.5 points)

Automatic systems, which turn the lights off when guests leave the room, shall be installed in **95% of the tourist accommodation.**

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

1. Criterion should be made mandatory. This criterion is also supported by Criterion 8: switching off lights.
2. Best practice is “for all rooms and corridor areas to have **intelligent lighting control**. For small enterprises **where automatic lighting control in rooms may not be practical**, the best practice is to install appropriately positioned signs **reminding guests to switch off lights (as required in EU Flower criteria for accommodation: EC, 2009)**.” Reference to the EU Ecolabel in this case shows that this criterion does not need updating.

The criterion is proposed remain as current criterion.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 48: Sauna timer control

Current criterion:

Sauna timer control (1 point)

All **sauna units and hammams** shall have a **timer control or a staff procedure** regulating the switching on/off.

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

1. No suggestions for updates were proposed.
2. BEMP -----

The criterion is proposed remain as current criterion.



Criterion 49: Swimming pool heating with renewable energy sources

Current criterion:

Swimming pool heating with renewable energy sources (up to 1.5 points)

Energy used to heat swimming pool water shall come from **renewable energy sources**. At least 50%: 1 point, 100%: 1.5 points.

*A&V: 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.*

1. Comments: It could be mandatory for all new swimming pools to fulfil this criterion. This may not, however, be feasible for all types of TA within the scope of the EU Ecolabel criterion.
2. BEMP - in general heating from renewable energy sources is required.

Criterion 49: Swimming pool heating with renewable energy sources

Proposal for revised criterion:

Swimming pool heating with renewable energy sources (up to 1.5 points)

Energy used to heat swimming pool water shall come from renewable energy sources. At least 50%: 1 point, 100%: 1.5 points.

A&V: 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. 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.

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 50: Automatic switching off outside lights

Current criterion:

Automatic switching off outside lights (1.5 points)

Outside lighting not needed for security reasons shall be **turned off automatically** after a defined **time**, or be activated through a **proximity sensor**.

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

Feedback: It was suggested that often outside lights may not be well maintained.

BEMP:

- To install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural-light and time.
- Minimise light pollution arising from outdoor lighting (e.g. through use of correctly-angled low-pressure sodium lamps).

5. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Energy**

Criterion 50: Automatic switching off outside lights

Proposal for revised criterion:

Automatic switching off outside lights (1.5 points)

Outside lighting not needed for security reasons shall be turned off automatically after a defined time, or be activated through a proximity sensor. Regular maintenance of outside lighting shall be undertaken.

Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems, along with a maintenance log or other record of maintenance.

5. Discussions: Optional criteria related to Energy

Criterion 31: Generation of electricity through renewable energy sources

Stakeholder comment: *'In France, it's rare that hotels use their own production, they usually sell it.'*

Should this criterion be measured in terms of 'net amount of electrical energy produced from renewable energy sources'?

Criterion 36: Combined heat and power — cogeneration

Stakeholder comment: *'It is suggested to add more points in accordance with the cost of equipment'*

Should the points allocation the proposed criteria be adjusted?

Criterion 40: Energy performance audits for buildings

Stakeholder comment: It is suggested to award more points, as the audit can be costly

Should the points allocation for the proposed criteria be adjusted?

6. Revision of criteria and discussion: Mandatory and optional criteria related to **Water**

- 11. Water flow from taps and showers**
- 12. Waste bins in toilets**
- 13. Urinal flushing**
- 14. Changing towels and sheets**
- 15. Correct waste water disposal**

- 51. Use of rainwater and recycled water
- 52. Automatic watering systems for outside areas
- 53. Water flow from taps and shower heads
- 54. WC flushing
- 55. Dishwasher water consumption
- 56. Washing machine water consumption
- 57. Tap water temperature and flow
- 58. Shower timers
- 59. Swimming pool cover
- 60. De-icing
- 61. Indications on water hardness
- 62. Water saving urinals
- 63. Indigenous species used for new outdoor planting
- New criteria**
- Swimming pool backwashing**

6. Revision of criteria and discussion: **Mandatory** and optional criteria related to **Water**

Criterion 11: Water flow from taps and showers

Current criterion:

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**.

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

Feedback: It is also suggested that the flow rate of taps and showers could be tightened (8 litres/minute).

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

Criterion 11: Water flow from taps and showers

Proposal for revised criterion:

Water flow from taps and showers

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

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

Table 1: Maximum available water flow rates for 'sanitary tapware'

Basin taps	without flow limiting device	6,0
	with flow limiting device ⁽¹⁾	8,0
Showerheads and showers ⁽²⁾		8,0

6. Revision of criteria and discussion: **Mandatory** and optional criteria related to **Water**

Criterion 12: Waste bins in toilets

Current criterion:

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.

A&V: The applicant shall provide a declaration of compliance with this criterion, together with appropriate documentation regarding the information to the guests.

1. No stakeholder feedback was received regarding this criterion.
2. BEMP does not provide specific guidance on the provision of waste bins in toilets, but rather outlines best practice for waste water management.

The criterion is proposed to remain as current criterion.

6. Revision of criteria and discussion: **Mandatory** and optional criteria related to **Water**

Criterion 13: Urinal flushing

Current criterion:

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

A&V: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the urinals installed.

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

The criterion is proposed to remain as current criterion.



Criterion 14: Changing towels and sheets

Current criterion:

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.

A&V: 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.

1. General consensus of the importance of retaining it.
2. BEMP "encourage guests to re-use towels and bin liners". This should be supported by "*prominent notices for guests advising on specific measures, including towel and bedclothes re-use*".

The criterion is proposed to remain as current criterion.

6. Revision of criteria and discussion: **Mandatory** and optional criteria related to Water

Criterion 15: Correct waste water disposal

Current criterion:

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.

A&V: 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).

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

The criterion is proposed to remain as current criterion.

6. Discussions: Mandatory criteria related to Water

Criterion 11: Water flow from taps and showers

Stakeholder comment: *'We think it's better to specify the maximum water flow to respect, based on an average water flow between taps and showers. In some cases we can have a flow for showers more than 8 L/min due to the size of the hotel (number important of stairs and difference of flow between the first floor and the last floor).'*

Do you agree that an average maximum water flow for taps and showers be set (as for the existing criterion)?

Criterion 15: Correct waste water disposal

Stakeholder comment: *'We suggested removing this criterion because the accommodation owners often don't understand what this criterion means and very often send the incomplete/wrong documentation. In fact, they don't have waste water plan'*

Should this criterion be removed?



Criterion 51: Use of rainwater and recycled water

Current criterion:

Use of rainwater (2 points) and recycled water (2 points)

(a) (2 points): **Rainwater** shall be collected and used for **non-sanitary** and **non-drinking purposes**.

(b) (2 points): **Recycled water** shall be collected and used for non-sanitary and non-drinking purposes.

A&V: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.

Feedback: Few suggestions that the use of rainwater could be made mandatory – even if this is only limited.

BEMP: “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**.”



Criterion 51: Use of rainwater and recycled water

Proposal for revised criterion:

Use of rainwater and recycled water (up to 3 points)

(a) (**1 point**): **Rainwater or recycled water** shall be collected and used for non-sanitary and non-drinking purposes in the external areas of the tourist accommodation (for example watering the garden or car washing).

(b) (2 points): **Rainwater or recycled water** shall be collected and used for non-sanitary and non-drinking purposes in the internal areas of the tourist accommodation (e.g. to flush toilets).

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.

Take into account the different systems needed **for 'indoor' and 'exterior' use** of recycled water. Due to the high investment required – making this mandatory would therefore not be practical.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 52: Automatic watering systems for outside areas (1.5 points)

Current criterion:

The tourist accommodation shall use an **automatic system** which **optimises watering times** and **water consumption** for **outside plants/ greening**.

A&V: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation.

Feedback: Award points where gardens are not watered. In addition, it was suggested that an automatic watering system can use more water than a manual system which relies on one trained person and a specific process.

BEMP: specifies that **water consumption for irrigation should be minimised in general**:

“minimise water consumption for irrigation and light pollution arising from outdoor lighting (e.g. through use of correctly-angled low-pressure sodium lamps).”

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 52: Automatic watering systems for outside areas

Proposal for revised criterion:

Watering systems for outside areas (1.5 points)

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

*A&V: 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.***

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 53: Water flow from taps and shower heads

Current criterion:

Water flow from taps and shower heads (1.5 points)

The **average flow** from all **taps** and **shower heads** excluding bath taps and filling stations shall not exceed **8 litres/minute**.

A&V: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation.

Feedback: Only two comments were received on this criterion, although they both suggested some confusion in identifying the difference between this criterion and Criterion 11: water flow from taps and showers.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 53: Water flow from taps and shower heads

Proposal for revised criterion:

Water flow from taps and shower heads (1.5 points)

The average flow from all taps and filing stations (excluding bath taps) shall not exceed 5 litres/minute.

A&V: The applicant shall provide a declaration of compliance and relevant documentation explaining how the tourist accommodation fulfils this criterion.

To align with this mandatory criterion, it is proposed that the water flow rate is reduced to 5 litres/minute for taps (up to 6 litres/minute is permitted as a maximum for the mandatory criteria). A flow below 8 litres/minute for showers has been found to be difficult to achieve.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 54: WC flushing

Current criterion:

WC flushing (1.5 points)

At least **95% of WCs** shall consume **6 litres per full flush or less**.

*A&V: The applicant shall provide a **detailed explanation** of how the tourist accommodation fulfils this criterion, together with appropriate **supporting documentation**.*

Feedback: The use of dual flush toilets is now very common, but a number of respondents were unsure whether these types of WCs are applicable for this criterion. There was also some confusion as to how the flush volume of the WC could be measured.

BEMP: “minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs”.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 54: WC flushing

Proposal for revised criterion:

WC flushing (1.5 points)

At least 95% of WCs shall consume a maximum average of 3.5 litres per full flush if using a water saving device or a maximum of 4.0 litres per full flush. Dual flush WCs are within the scope of this criterion

A&V: (...). The calculation shall be in accordance with Appendix 1 of Commission Decision of 7 November 2013 EU Ecolabel for flushing toilets and urinals.

The criterion should also be updated to accord with the minimum EU Ecolabel requirements for WCs.

It is proposed that this criterion be updated to **refer to the EU Ecolabel requirements for WCs.**



Criterion 55: Dishwasher water consumption (1 point)

Current criterion:

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.

*A&V: 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**.*

Directive 97/17/EC was repealed.

Feedback: Could be made more applicable for commercial appliances.

BEMP: Selection of an appropriate size and type of efficient dishwasher with low water consumption is best practice.

There is no longer an EU Ecolabel product group entitled “Dishwashers”.

Proposal for revised criterion:

Dishwasher water consumption (1 point)

The annual water consumption (AWC) of the dishwashers, expressed in litres per year, shall be lower or equal to the threshold as defined in the equation below:

$$\text{AWC (measured)} \leq (0.625 \times S) + 9.25$$

where:

AWC (measured) = the measured annual water consumption of the dishwasher in litres.

S = the applicable number of standard place settings of the dishwasher. The criterion only applies to household dishwashers covered by Commission Delegated Regulation (EU) No 1059/2010

A&V: The applicant shall provide the annual water consumption of the Dishwasher calculated according to Point 3 of Annex VII of Commission Delegated Regulation (EU) No 1059/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household dishwashers i.e. the annual water consumption (AWC) of a household dishwasher is calculated, in litres and rounded up to the nearest integer, as:

$$\text{AWC} = \text{Wt} \times 280$$

where:

Wt = water consumption for the standard cleaning cycle, in litres and rounded to one decimal place



Criterion 56: Washing machine water consumption (1 point)

Current criterion:

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.

A&V: The applicant shall provide the annual water consumption of the washing machine calculated according to the technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the washing machines or evidence that the washing machines have been awarded the Community eco-label. The tourist accommodation management shall provide technical documentation from its laundry service provider that their washing machine complies with the criterion.

Regulation: Commission Decision 95/12/EC was repealed.

Feedback: suggested that the use of commercial appliances should be considered.

BEMP: Procurement of efficient washing machines is encouraged to reduce both energy and water use.

There is no longer an EU Ecolabel product group entitled “Washing Machines”.

6. Revision of criteria and discussion: Mandatory and optional criteria related to Water

Criterion 56: Washing machine water consumption (1 point)

Proposal for revised criterion:

The washing machines used within the tourist accommodation by guests and staff or those used by the tourist accommodation laundry service provider shall use no more than 12 litres of water per kg of wash-load measured according to EN 60456, using the same standard 60 ° C cotton cycle as chosen for Commission Delegated Regulation (EU) No 1061/2010.

This criterion only applies to household washing machines covered by Commission Delegated Regulation (EU) No 1061/2010.

A&V: The applicant shall provide a technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the washing machines. The tourist accommodation management shall provide technical documentation from its laundry service provider that their washing machine complies with the criterion.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 57: Tap water temperature and flow

Current criterion:

Tap water temperature and flow (1 point)

At least **95% of taps** shall allow a precise and prompt **regulation** of the **water temperature and of the water flow**.

A&V: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation.

1. BEMP outlines the benefits of tap flow and temperature regulation: Thermostatic mixers maintain a specific water temperature, adjusting for flow and pressure variations, according to calibrated settings. They enable precise and rapid temperature control at different flow rates, allowing water flows to be stopped and restarted quickly – e.g. to apply shampoo – this minimising water and energy use.

The criterion is proposed to remain as current criterion.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 58: Shower timers

Current criterion:

Shower timers (1.5 points)

All **showers** in sanitary facilities/common areas shall have a **timing/proximity device** which interrupts water flow after a defined time or if not in use.

A&V: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation.

1. The comments that were received mentioned that these shower timers can be 'annoying' for guests. However, this position was not widely held and the criterion does not need to be changed as a result of this.
2. BEMP does not provide any updates on the use of shower timers.

The criterion is proposed to remain as current criterion.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 59: Swimming pool cover

Current criterion:

Swimming pool cover (1 point)

At **night** or when the filled swimming pool is **not used** for more than a day, it shall be **covered to prevent the cooling** of the water in the pool and **to reduce evaporation**.

A&V: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation.

Feedback: Impracticalities of using pool covers. In Mediterranean areas it is counterproductive to cover swimming pools as during the daytime the water get to hot, and needs to cool down over night, rather than retain its heat.

BEMP: BEMP for the operating of swimming pools does suggest the correct use of pool covers to reduce heat loss. This is in accordance with the current EU Ecolabel criterion for the use of pool covers. **However, BEMP does not specify best practice for non-heated swimming pools versus heated.**

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 59: Swimming pool cover

Proposal for revised criterion:

Swimming pool cover (1 point)

Heated swimming pools shall be covered at night to prevent the cooling of the water in the pool and to reduce evaporation. (1 point)

Or

Non-heated, filled swimming pools shall be covered when these are not used for more than a day to reduce evaporation (1 point)

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

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 60: De-icing (up to 1.5 point)

Current criterion:

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.

A&V: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation.

Feedback: Points should also be awarded for sites not carrying out any de-icing. However, it is suggested that the criterion is not changed to reflect this.

BEMP: relates to minimising the use of chemicals on site, including those used for de-icing. No EU Ecolabel has been developed for this category of products. It is proposed to delete the reference to EU Ecolabel.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 61: Indications on water hardness

Current criterion:

Indications on water hardness (up to 2 points)

In proximity to **sanitary areas/washing machines/dishwashers** there shall be displayed **explanations on local water hardness** (1 point) to allow better use of detergents by guests and staff or an **automatic dosage system** (1 point) shall be used which optimises detergent use **according to water hardness**.

A&V: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation showing how the guest is informed.

1. BEMP suggests that “in addition to training and signage, clear marking of fill levels on spray bottles can reduce the incidence of incorrect dilution. Dilution volumes should be adjusted for water hardness.” This is covered in the EU Ecolabel criterion.

The criterion is proposed to remain as current criterion.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 62: Water saving urinals

Current criterion:

Water saving urinals (1.5 points)

All **urinals** shall use a **waterless system** or have a **manual/electronic flushing system, which permits single flushing of every urinal only when used.**

*A&V: The applicant shall provide **detailed supporting documentation** of how the tourist accommodation fulfils this criterion.*

1. BEMP measures are outlined as the “Installation or retrofitting of controlled-flush or waterless urinals”. This corresponds with the existing EU Ecolabel criterion and so no update is proposed.

The criterion is proposed to remain as current criterion.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

Criterion 63: Indigenous species used for new outdoor planting

Current criterion:

Indigenous species used for new outdoor planting (1 point)

Any **planting of outdoor areas with trees and hedges** shall be composed of **indigenous species of vegetation**.

*A&V: The applicant shall provide the **relevant specification** of how the tourist accommodation fulfils this criterion, together with appropriate **supporting documentation by an expert**.*

1. It was suggested that species “in accordance with the location” could also be planted or perhaps some allowance made for a few decorative plants.
2. BEMP “Planting of green areas with indigenous species to minimise irrigation requirements”. This is in line with the current EU Ecolabel criterion.

The criterion is proposed to remain as current criterion.

6. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Water**

New criterion: Swimming pool backwashing

Best practice water management for tourist accommodation relates primarily to optimising backwash procedures to ensure water loss is minimised

Proposal for new criterion:

Swimming pool backwashing (2 points)

The **frequency and timing of swimming pool backwashing procedures** have been **optimised**, and follow a **documented procedure** which has been developed to minimise water use. All relevant **staff shall also be trained** in following this procedure to ensure water use during backwashing is minimised.

A&V: the applicant shall demonstrate compliance by providing the document backwashing procedure along with a declaration confirming that this is followed and that staff are aware of the procedure. This will be checked as part of the on-site inspection.

6. Discussions: Optional criteria related to Water

All optional criteria related to water

Should the points allocation for the proposed criteria be adjusted?

Criterion 51: Use of rainwater and recycled water

Stakeholder comment: *It is suggested that the number of points should not be reduced, in order to motivate applicants*

Should the points allocation for the proposed criteria be adjusted?

Criterion 52: Automatic watering systems for outside areas

Stakeholder comment: *'It would be better not to add and ask more documentation to the TAS.'*

Should the accommodation service providers be required to include including details of the documented system/procedure for watering?

6. Discussions: Optional criteria related to Water

Criterion 54: WC flushing

Stakeholder comment: *'It's too stringent, because it depends on the equipment (problem of corking of pipes)'*

Are the limits set in this criterion too stringent?

New criterion: Swimming pool backwashing

This criterion has been added to align with BEMP.

Should this new criterion be added?

Should this criterion be optional?

Do you agree with the proposed assessment and verification method?

Should the points allocation for the proposed criteria be adjusted?

7. Revision of criteria and discussion: Mandatory and optional criteria related to **Waste**

18. Waste separation by guests
19. Waste separation
20. Disposable products
21. Breakfast Packaging

72. Composting
73. Disposable drink containers ?
~~74. Fat/oil disposal~~
75. Run-off from car parks (CSS)
76. Used textiles, furniture and other products

7. Revision of criteria and discussion: Mandatory and optional criteria related to Waste

Criterion 18: Waste separation by guests

Current criterion:

Waste separation by guests

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

A&V: declaration of compliance + relevant documentation on the information to guests (...)

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

To clarify what is ‘adequate’ in terms of availability of waste separation bins.

Proposal for revised criterion:

Waste separation by guests

(...) Adequate containers for waste separation shall be available in the rooms or within easy reach; as a minimum, containers should be available on each floor and/or in each block of the tourist accommodation. (...)

7. Revision of criteria and discussion: Mandatory and optional criteria related to Waste

Criterion 19: Waste separation

Current criterion:

Waste separation

Waste shall be separated into the categories that can be **handled separately** by the **local or national waste management facilities**, with **particular care regarding hazardous waste**, (...)

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.

A&V: declaration of compliance with this criterion + indication of the different categories of waste accepted by the local authorities, and/or relevant contracts with private agencies.

7. Revision of criteria and discussion: Mandatory and optional criteria related to **Waste**

Criterion 19: Waste separation

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

Proposal for revised criterion:

Waste separation

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

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

Assessment and verification: (...)

7. Revision of criteria and discussion: Mandatory and optional criteria related to Waste

Criterion 20: Disposable products

Current criterion:

Disposable products

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

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

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

7. Revision of criteria and discussion: Mandatory and optional criteria related to **Waste**

Criterion 20: Disposable products

Feedback: ban on these products can conflict with national quality and/or star ratings. // be tightened to limit even further the use of disposable items.

BEMP: *“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 – (...)*

Proposal for revised criterion:

Disposable products

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

The following exceptions apply:

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

A&V: (...) and documentation explaining to guests why disposable products are not provided and about the refillable products and systems supplied.

7. Revision of criteria and discussion: Mandatory and optional criteria related to **Waste**

Criterion 21: Breakfast packaging

Current criterion:

Breakfast packaging

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

A&V: declaration of compliance + a detailed explanation on how the accommodation fulfils it + a list of single dose products used and the legislation requiring this.

Feedback: hygiene, legislative requirements or availability of products in single packages. Issue of food waste (from bulk supply) versus packaging waste (single use products).

BEMP: Although breakfast packaging is not considered a key environmental impact for hotels,

“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.”

7. Revision of criteria and discussion: Mandatory and optional criteria related to Waste

Proposal for revised criterion:

Food packaging

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

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

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

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

A&V: declaration of compliance + 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.

7. Discussions: Mandatory criteria related to Waste

Criterion 20: Disposable products

Stakeholder comment: *requirements of standard private chains \subset quality rating scheme ?*

Are the standard operations of private chains included in the term 'quality rating scheme'?

Stakeholder comment: *It should specify: 'on request at reception'.*

Do you agree with this proposal?

Stakeholder comment: *'Are disposable towels included in the definition?'*

What is the definition of 'disposable products'?

Criterion 21: Breakfast packaging

Stakeholder comment:

Definition of perishable goods.

Not in favour of widening the group of food stuffs allowed in single use packaging.

Do you agree on the proposed criterion?

Stakeholder comment: *'How will Competent Authorities verify it?'*

Is additional guidance required to explain this? if yes, what would an appropriate measurement be?

7. Revision of criteria and discussion: Mandatory and optional criteria related to **Waste**

Criterion 72: Composting

Current criterion:

Composting (up to 2 points)

The tourist accommodation shall **separate relevant organic waste** (garden waste 1 point; kitchen waste 1 point) and shall ensure that it is **composted according to local authority guidelines** (e.g. by the local administration, in-house or by a private agency).

A&V: detailed explanation of how the tourist accommodation fulfils this criterion, + appropriate supporting documentation if relevant.

- BEMP highlights the importance of properly managing food waste by first minimising avoidable waste. *“all organic waste is separated and sent for anaerobic digestion where available, or alternatively incineration with energy recovery or local/on-site composting.”*

The criterion is proposed to remain as current criterion.

7. Revision of criteria and discussion: Mandatory and optional criteria related to Waste

Criterion 73: Disposable drink containers

Current criterion:

Disposable drink containers (2 points)

Disposable drink containers **shall not be offered** in the areas under the ownership or the direct management of the tourist accommodation.

A&V: declaration of compliance + indication of which such disposable products are used, if any, and the legislation requiring this.

Feedback: Split view on whether or not there should be a total ban on all disposable drinks containers

BEMP: No specific mention to disposable drinks containers, it recommends avoiding single-use items.

Criterion 20: Disposable products: *“Disposable drinking systems (cups and glasses), plates and cutlery shall only be used...”*

No proposal for the moment.

7. Revision of criteria and discussion: Mandatory and optional criteria related to **Waste**

Criterion 74: Fat/oil disposal

Current criterion:

Fat/oil disposal (up to 2 points)

Fat separators shall be installed and pan **fat/oils and deep-frying fat/oils shall be collected and disposed of appropriately** (1 point). Proper disposal of own fat/oil is offered to guests (1 point).

A&V: detailed explanation of how the tourist accommodation fulfils this criterion, + appropriate supporting documentation.

BEMP: “(...) relevant recycling services at least for glass, paper and cardboard, plastics, metals and organic waste.”

Mandatory proposed Criterion 19: Waste separation, states that waste (including fats/oils) shall be separated into categories that can be “handled separately by the local or national waste management facilities”.

It is therefore suggested that Criterion 74: fat/oil disposal is removed.

7. Revision of criteria and discussion: Mandatory and optional criteria related to Waste

Criterion 75: Run-off from car parks

Current criterion:

Run-off from car parks (1 point)

Oil and similar run-off from vehicles on the car park shall be collected and correctly disposed of.

*Assessment and verification: The applicant shall provide a detailed explanation on how the **camp site** fulfils this criterion, together with appropriate supporting documentation.*

- No stakeholder feedback was received regarding this criterion.
- BEMP does not provide any updates for guidance regarding car park run-off, but specifies that this should be correctly managed.
- It is suggested that car park run-off could also be relevant other types of tourist accommodation and so the criterion should be expanded to reflect this.

7. Revision of criteria and discussion: Mandatory and optional criteria related to **Waste**

Criterion 76: Used textiles, furniture and other

Current criterion:

Used textiles, furniture and other products (up to 3 points)

Used furniture, textiles and other products such as **electronic equipment**, shall be **given to charity** according to the tourist accommodation's policy (2 points) **or sold** (1 point) to other **associations** which collect and **redistribute such goods**.

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

- Definition of the A&V– often charitable organisation may not provide receipts when items are donated.
- BEMP promotes the importance of the waste hierarchy.

It is proposed that the only changes that are made relate to clarifications.

7. Revision of criteria and discussion: Mandatory and optional criteria related to Waste

Criterion 76: Used textiles, furniture and other products

Proposal for revised criterion:

Used textiles, furniture and other products (up to 3 points)

Used furniture, textiles and other products such as electronic equipment, shall be given to charity according to the tourist accommodation's policy (2 points) or sold (1 point) to other associations which collect and redistribute such goods.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation e.g. receipts etc. Where evidence (such as a receipt) is not given to tourist accommodations' upon donation of goods, the tourist accommodation should keep a record of the goods donated, where and when they were donated, and the person responsible for this.

7. Discussions: Optional criteria related to Waste

All optional criteria related to waste

Should the points allocation for the proposed criteria be adjusted?

Criterion 73: Disposable drink containers

Stakeholders are invited to provide their feedback on the update of this criterion.

Should this criterion therefore be removed or be mandatory?.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

22. No smoking in common areas

23. Public transportation

New criteria

-Local food products

-Fundamental principles and rights at work

77. Regulation of campsite traffic (CSS)

78. Campsite general traffic (CSS)

79. Trolleys for guest on the campsite (CSS)

80. Unsealed surfaces (CSS)

81. Roof landscaping

82. Environmental communication and education

83. No smoking in common areas and rooms

84. Bicycles

85. Pick up service

86. Returnable or refillable bottles

87. Use of rechargeable products

88. Paper products

89. Durable goods

90. Local food products

91. Organic food

92. Indoor air quality

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 22: No smoking in common areas

Current criterion:

No smoking in common areas

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

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

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

BEMP: No mention about **restricting smoking** in tourist accommodation.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 22: No smoking in common areas

Option 1:

This criterion **could be removed** as all EU countries have adopted measures to protect citizens against exposure to tobacco smoke following the COUNCIL RECOMMENDATION of 30 November 2009 on smoke-free environments (2009/C 296/02).

Proposal for revised criterion, Option 2:

No smoking in common areas

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

Assessment and verification: a declaration of compliance with this criterion.

Proposal for revised criterion, Option 3:

No smoking in common areas

No smoking shall be allowed in any indoor common areas.

Assessment and verification: a declaration of compliance with this criterion.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 23: Public transportation

Current criterion:

Public transportation

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

A&V: declaration of compliance + copies of the information material available.

Proposal for revised criterion:

Public transportation

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

A&V: declaration of compliance + copies of the information material available e.g. on website, brochures etc.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Proposed new criterion: Local food products

Proposal for new criterion:

Local food products (mandatory)

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

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

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

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

8. Revision of criteria and discussion: Mandatory and optional

Proposal for new criterion:

Fundamental principles and rights at work (mandatory)

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

029 Forced Labour

087 Freedom of Association and Protection of the Right to Organise

098 Right to Organise and Collective Bargaining

100 Equal remuneration

105 Abolition of Forced Labour

111 Discrimination (Employment and Occupation)

138 Minimum Age Convention

182 Elimination of the Worst Forms of Child Labour

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

8. Discussions: Mandatory criteria related to Other services

Criterion 23: Public transportation

The LCA literature raised the importance of guest transportation (from home to home).

Effective actions to promote the most environmentally-sound forms of transport.

- ✓ *Train transportation could be promoted through campaigns and environmental marketing.*
 - *Example: Trenitalia and the Hotelier Association of Riccione*
- ✓ *Regarding road transportation (Bus and cars), more environmentally-sound solutions should be promoted*

Should the current criteria to cover additional requirements for the provision of information regarding preferable means of transport from home to home?

Proposed new criterion: Local food products

Stakeholder comment: *necessary to refer to a legal/official list per country. the examination of documentation must be precise and equal for every MS.*

Should this new criterion be added? Should this be mandatory? Are there any other factors which need to be included?

Do you agree with the proposed assessment and verification method?

8. Discussions: Mandatory criteria related to Other services

Proposed new criterion: Fundamental principles and rights at work

Stakeholder comment:

- *'It should be more clearly specified what sort of verification is regarded as independent.*
- *'This criterion is a European regulation point. It can be difficult to prove for the applicant. Besides, are the auditors skilled to evaluate that point properly?'*
- *'It would be good to set criteria for fundamental principles and rights at work, but for practical reasons we don't support this. Difficulties to verify and control these criteria.'*
- *'We suggest it would be more useful to include an optional criterion on social actions carried out by the TAS for its members of staff.'*

Should this new criterion be added?

If yes, should this be mandatory? Are there any other factors which need to be included?

Do you agree with the proposed assessment and verification method?

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 77 (campsite only): Regulation of traffic

Current criterion:

Regulation of campsite traffic (1 point) (campsites only)

All traffic (guests and maintenance/transport) inside the camp ground **shall be limited** to defined **hours and areas**.

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

- Only one comment was received for this criterion, suggesting that it could be tightened to further restrict traffic. However, this is problematic across different types of sites and so it is suggested that the criterion is maintained.
- BEMP has not been updated since the previous CSS criterion revision – the focus is still on regulating traffic effectively to ensure minimisation of emissions.

The criterion is proposed to remain as current criterion.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 78 (campsite only): Campsite generated traffic

Current criterion:

Campsite generated traffic (1 point) (campsites only)

The campsite shall **not use combustion motor vehicles for transport and maintenance on the camp ground.**

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

- No stakeholder feedback was received for this criterion.
- There is no specific BEMP relating to the types of traffic used on the campsite grounds – the current criterion is therefore still relevant.

The criterion is proposed to remain as current criterion.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 79 (campsite only): Trolleys for guests on the campsite

Current criterion:

Trolleys for guests on the campsite (1 point) (campsites only)

For transportation of luggage and shopping on the site, **trolleys or other non-motorised means of transport shall be at guests' disposal free of charge.**

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

- No stakeholder feedback was received regarding this criterion.
- BEMP has not been updated since the previous CSS criterion revision – therefore no update to the criterion is required.

The criterion is proposed to remain as current criterion.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 80 (campsite only): Unsealed surfaces

Current criterion:

Unsealed surfaces (1 point) (campsites only)

At least **90% of the campsite area** surface is **not covered with asphalt/cement or other sealing materials**, which hinder proper drainage and airing of the soil.

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

- No stakeholder feedback was received regarding this criterion.
- Current BEMP references EU Ecolabel requirements as good practice in management of outside areas, including Criterion 80: Unsealed surfaces.

The criterion is proposed to remain as current criterion.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 81: Roof landscaping

Current criterion:

Roof landscaping (2 points)

At least **50% of tourist accommodation buildings** which have suitable roofs (flat roofs or roofs with a small angle of inclination) and are not used for other purposes shall be **grassed or planted**.

A&V: explanation of how the tourist accommodation fulfils this criterion + appropriate supporting documentation.

Feedback: expensive and can be very difficult to achieve. //

'façade greening' should also be considered.

BEMP: "To maximise on-site biodiversity through planting of native species, installation of green or brown roofs and walls, (...)"

It is suggested that the criterion be updated to include both roof and façade landscaping

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 82: Environmental communication and education

Current criterion:

Environmental communication and education (up to 3 points)

The tourist accommodation shall provide **environmental communication and education** notices on **local biodiversity, landscape and nature conservation** measures to guests (1.5 points). **Guest entertainment includes elements of environmental education** (1.5 points).

A&V: detailed explanation of how the tourist accommodation + appropriate supporting documentation.

BEMP: “provide guests with interactive on-site education of environmental issues, including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles)”. This is in line with the current EU Ecolabel criterion for environmental communication and education.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 82: Environmental communication and education

Proposal for revised criterion:

Environmental communication and education (up to 3 points)

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

The tourist accommodation shall provide communication on local guides, restaurants, markets, craft centres to guests (1 point).

Guest entertainment includes elements of environmental education (1 point).

Assessment and verification: (...)

Other comparable labels: providing guests with information on “guides, restaurants, markets and craft centres” [Travelife criteria (2012)].

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 83: No smoking in common areas and rooms

Current criterion:

No smoking in common areas and rooms (up to 1.5 points)

Smoking shall not be allowed in **100% of indoor common areas** and at least **70%** (1 point) or at least **95%** (1.5 points) of **guests' rooms** or rental accommodation.

A&V: The applicant shall indicate the number and nature of the areas and shall indicate which of these are non-smoking.

Feedback: It should be no-smoking throughout. However, outside of Europe where restrictions on smoking are more lax, a total ban on smoking throughout the tourist accommodation may be difficult to comply with.

In Europe, stringent anti-smoking laws mean that tourist accommodation sites typically have to comply with the first part of this criterion; no smoking in common areas. However, there is often an exemption in place which means some allocated rooms allow smoking.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 83: No smoking in common areas and rooms

Proposal for revised criterion, **Option 1: no changes**

Option 1: No smoking in common areas and rooms (up to 1.5 points)

Smoking shall not be allowed in 100% of indoor common areas and at least 70% (1 point) or at least 95% (1.5 points) of guests' rooms or rental accommodation.

Assessment and verification: The applicant shall indicate the number and nature of the areas and shall indicate which of these are non-smoking.

Proposal for revised criterion, **Option 2:**

Option 2: No smoking in common areas and rooms (up to 1.5 points)

Smoking shall not be allowed in **100%** of indoor common areas and guest accommodation.

Assessment and verification: The applicant shall provide a declaration to state that the tourist accommodation meets this criterion.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 84: Bicycles

Current criterion:

Bicycles (1.5 points)

Bicycles shall be made **available to guests**. (At least **three bikes for every 50 rooms**)

A&V: explanation of how the tourist accommodation fulfils this criterion.

Feedback: wide range of feedback: to increase the number of bikes to reducing the number required (as, for CSS in particular, guests may bring bikes with them).

‘Real local and close partnership’ with **bike hire companies** in the area; this would require that this offer is actively communicated to guests.

BEMP: BEMP does not specify best practice for the number of bikes which should be provided to guests in tourist accommodation. However, low-carbon forms of transport (including bikes) should be encouraged.



8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 84: Bicycles

Proposal for revised criterion:

Bicycles (1.5 points)

Bicycles shall be made available to guests. (At least three bikes for every 50 itches and/or rental accommodation units and/or rooms) (1.5 points)

Or

The tourist accommodation shall have active links with bicycle hire companies; access to these shall be clearly communicated to guests (1 point).

A&V: (...) + 'Active links' between tourist accommodation and a bicycle hire company should be visible on site. For example, the tourist accommodation should be actively promoting the hire company to guests and there should be evidence to show this e.g. promotional information. Where the hire company is not based on the site of the tourist accommodation, some practical considerations should be made. For example, the bicycle hire company may deliver bikes to the tourist accommodation service.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 85: Pick up service

Current criterion:

Pick up service (1 point)

The tourist accommodation shall **offer guests** travelling with public transport **pick up service** at arrival with **environmentally friendly means of transportation** such as **electric cars or horse sleds**.

Assessment and verification: The applicant shall provide an explanation on how the tourist accommodation fulfils this criterion and an example how it is communicated to guests.

Feedback: Points to TAS if active communication and operating a pick-up service at arrival, not limiting this to only the used of 'environmentally friendly means of transportation'.

The use of 'electric cars or horse sleds' is not very common, but perhaps car sharing or collective transport could be considered.

BEMP: the use of public transport and 'environmentally friendly' transport is to be encouraged.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 85: Pick up service

- LCA review revealed that transport to and from the tourist accommodation can have a significant environmental impact the mode of transport is therefore important.
- Environmental impact of electric cars is dependent on the carbon intensity of the grid.
- Collective transport: the greatest effect in reducing the environmental impact of transportation. The criterion should therefore focus on the promotion of this.

Proposal for revised criterion:

Pick up service (1 point)

The tourist accommodation shall offer guests travelling with transport pick up service at arrival via a car sharing or collective transport scheme (1 point)

A&V: (...) + . A collective transport scheme may, for example, include sharing transport (such as a minibus) between hotels. Guests booked in at different tourist accommodation sites may be picked up from public transport points in the same vehicle, and dropped off at the appropriate accommodation.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 86: Returnable or refillable bottles

Current criterion:

Returnable or refillable bottles (up to 3 points)

The tourist accommodation **shall offer beverages in returnable/refillable bottles**: soft drinks (1 point), beer (1 point), water (1 point).

A&V: detailed explanation of how the tourist accommodation fulfils this criterion + appropriate supporting documentation from the suppliers of the bottles.

- Feedback: adding an indication of quantity
- BEMP has not been updated since the previous TAS and CSS criteria revision, and still promotes the importance re-using products, as outlined in the waste hierarchy: *Reduce – Re-use – Sort – Recycle*.

The criterion is proposed to remain as current criterion.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 87: Use of rechargeable products

Current criterion:

Use of rechargeable products (up to 2 points)

The tourist accommodation shall use only rechargeable batteries for TV remote controls (1 point), and/or rechargeable cartridges for toner for printers and photocopiers (1 point).

A&V: detailed explanation of how the tourist accommodation fulfils this criterion + appropriate supporting documentation from the suppliers of the batteries and/or the refillers of the toner cartridges.

BEMP outlines that “Single-use disposable items are avoided where possible (e.g. plastic bin liners are avoided, toner/ink cartridges are refilled and rechargeable batteries are selected).”

It is suggested that the **criterion is updated to require that all consumables use rechargeable batteries**, not just TV remotes. In addition, it is suggested that a **point is added for tourist accommodation sites which don't use plastic bin liners, in line with BEMP guidance**

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 87: Use of rechargeable products

Proposal for revised criterion:

Reusable and rechargeable products (up to 3 points)

The tourist accommodation shall use only rechargeable batteries for all consumables (1 point), and/or rechargeable cartridges for toner for printers and photocopiers (1 point) and/or no bins in guest rooms or common areas shall use single-use (i.e. not reused) disposable plastic bin liners (1 point).

Assessment and verification: (...)

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 88: Paper products

Current criterion:

Paper products (up to 3 points)

At least 80% of toilet/tissue paper and/or office paper and/or printed paper used shall have been awarded the Community eco-label or other national or regional ISO Type I eco-labels (1 point for each of these three categories of paper products).

A&V: data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

BEMP: minimisation of the use of resources, “especially paper and ink” and to “select environmentally certified materials and services (e.g. printing services)”.

Very high market availability of these products.

Proposal for revised criterion:

Paper Products (up to 3 points)

90% (...) (1 point for each of these three categories of paper products).

Assessment and verification: (...)



8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 89: Durable goods

Current criterion:

Durable goods (up to 3 points)

At least **30%** of any category of **durable goods** (such as bed-linen, towels, table linen, PCs, portables, TVs, mattresses, furniture, washing machines, dishwashers, refrigerators, vacuum cleaners, floor coverings, light bulbs) present in the tourist accommodation, including rental accommodation, shall have been awarded the **Community eco-label or other national or regional ISO Type I eco-labels** (1 point for each of up to three categories of durable goods).

A&V: data and documentation indicating the quantities of such products owned and the quantities that have an eco-label.

BEMP: In general, BEMP specifies that eco-labelled products are preferable.

Other updates: new EU Ecolabelled product groups since the previous revision

- Tapware
- Flushing toilets and urinals

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 89: Durable goods

Proposal for revised criterion:

Durable goods (up to 3 points)

At least 30% of any category of durable goods (such as bed-linen, towels, table linen, PCs, portables, TVs, mattresses, furniture, washing machines, dishwashers, refrigerators, vacuum cleaners, floor coverings, light bulbs, tapware, flushing toilets and urinals) present in the tourist accommodation, including rental accommodation, shall have been awarded the EU 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.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 90: Local food products

Current criterion:

Local food products (up to 3 points)

At least **two locally sourced** and **not out of season** (for fresh fruit and vegetables) **food products** shall be **offered** at each meal, including breakfast (1.5 points).

Where applicable, consumption of local endangered species such as specific fish and crustacean species and 'bushmeat' and shrimps from mangrove forest endangering cultivation shall be forbidden in the food outlets (1.5 points) and in the shops (1.5 points).

A&V: declaration of compliance with this criterion + appropriate supporting documentation

Feedback: the importance of encouraging use of local goods, not just food products.

BEMP: “*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*”

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 90: Local food products

Proposal for revised criterion:

Local products (optional up to 3 points)

At least two locally sourced and not out of season (for fresh fruit and vegetables) food products shall be offered at each meal including breakfast (1.5 points).

The tourist accommodation actively chooses **local suppliers of other goods and services** (1.5 points).

Assessment and verification: (...)

Many comparable labels for tourist accommodation include criteria on procuring local goods and services.

It is suggested that the following is made mandatory

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 and in the shops

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 91: Organic food

Current criterion:

Organic food (up to 3 points)

The main ingredients of at least two dishes (1 point) or the whole menu including breakfast (2 points) and at least 4 products sold in the shop (1 point) shall have been produced by organic farming methods, as laid down in Regulation (EC) No 834/2007 or produced according to an ISO Type I eco-label.

A&V: declaration of compliance + appropriate supporting documentation.

Feedback: In some countries (Austria and Germany) it is possible for restaurants and hotels to become certified for the use of only organic products. These schemes are not available across Europe but the assessment and verification section should note that these schemes may be used as supporting documentation of compliance.

It is suggested that mention of ISO Type I eco-labels is removed as any product labelled as organic in EU shall meet the Regulation (EC) No 834/2007.

8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Current criterion:

Indoor air quality (up to 4 points)

The tourist accommodation shall provide an **optimal indoor air quality** through one or both of the following measures:

- the rooms, rental accommodation and common areas shall correspond to the requirements laid down in point 3 of Annex I to Council Directive 89/106/EEC and shall **contain only painting, decorating, furniture and other materials certified** with the Community eco-label or another equivalent low emission ISO Type I environmental label (2 points);
- the rooms, rental accommodation and common areas shall be **fragrance free**, the sheets, towels and textiles shall be washed with fragrance free detergents (1 point) and cleaning shall be carried out with fragrance free means (1 point).

A&V: declaration of compliance + 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.



8. Revision of criteria and discussion: Mandatory and optional criteria related to **Other services**

Criterion 92: Indoor air quality

Proposal for revised criterion:

Indoor air quality (up to 4 points)

(...)

- the rooms, rental accommodation and common areas shall correspond to the requirements laid down in point 3 of Annex I to Regulation (EU) No 305/2011 and shall contain only painting, decorating, furniture and other materials certified with the EU eco-label or another equivalent low emission ISO Type I environmental label (2 points);
- (...)

Assessment and verification: (...)

Feedback: The difficulty in achieving this criterion, it is too strict and not practical.

Clarification about how this criterion could be met – in particular about how air quality can be “proved”.

It is suggested that this criterion remains unchanged. Although this may be difficult to achieve, this criterion is optional and reflects best practice.

8. Discussions: Optional criteria related to Other services

All optional criteria related to other services

Should the points allocation for the proposed criteria be adjusted? Especially for Criterion 81. Roof landscaping as this can be difficult to achieve.

Criterion 82: Environmental communication and education

Stakeholder comment: *'As these Ecolabel criteria will be updated to reflect social aspects related to impact on local communities, this criterion should be made mandatory.'*

Should this criterion remain optional?

8. Discussions: Optional criteria related to Other services

Criterion 83: No smoking in common areas and rooms

Two options have been proposed:

1. This criterion is maintained (points are awarded for making up to 70% or up to 95% of guest rooms 'non-smoking')
2. A total ban on smoking in all guest rooms.

Which option is preferred?

Should the points allocation for the proposed criteria be adjusted?

Criterion 90: Local food products

Stakeholder comment: *significant to sustain local products. It should be mandatory.'*

'As these Ecolabel criteria will be updated to reflect social aspects related to impact on local communities, this criterion should be made mandatory.'

Should this criterion remain optional?

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

- 24. Maintenance and servicing of boilers and air conditioning systems
- 25. Policy setting and environmental program
- 26. Staff training
- 27. Information to guests
- 28. Energy and water consumption data
- 29. Other data collection
- 30. Information appearing on the eco-label

- 93. EMAS registration, ISO certification of the tourist accommodation
- 94. EMAS registration or ISO certification of suppliers
- 95. Compliance by subcontractors with mandatory criteria
- 96. Energy and water meters
- 97. Additional environmental actions

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Current criterion:

Maintenance and servicing of boilers and air conditioning systems

Maintenance and servicing of boilers and air conditioning systems **shall be carried out at least yearly**, or more often if so required by law or need, by appropriately **qualified professionals**, following **CEN 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**(...).

A&V: declaration of compliance + description of the boilers and their maintenance programme, + 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.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 24: Maintenance and servicing of boilers and air conditioning

Regulation: New regulation should repeal Regulation (EC) No 842/2006 in January 2015.

Feedback: Further guidance on how to collect this information may be helpful.

BEMP: “ensure that all equipment is maintained through appropriate periodic inspection”.

Proposal for revised criterion:

Maintenance and servicing of boilers and air conditioning systems

(...).

For air conditioning systems and heat pumps, the maintenance (check for leakage and repair) has to be carried out according Regulation (EU) No 517/2014

A&V: 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, together with the certification according Article 10 of Regulation EU No 517/2014, and what is checked during the maintenance.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 25: Policy setting and environmental programme

Current criterion = proposed to be retained

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.

A&V: declaration of compliance + copy of the environmental policy or the policy statement and action programme, and procedures for taking into account input from guests.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 26: Staff training

Current criterion:

Staff training

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

Concerning **energy** saving:

— Staff shall be trained on how to save energy.

Concerning **water** saving:

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

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

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

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Current criterion:

Staff training (...)

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.

A&V: declaration of compliance + details of the training programme, its content, and an indication of which staff have received what training and when. + copies of procedures and staff communication concerning all mentioned issues.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 26: Staff training

Feedback: specific mention of EU Ecolabel in training and timings for training should be set.

BEMP: sustainability issues are included in basic training on waste reduction and water, and energy minimisation.

It is suggested that a section is added about **ensuring staff awareness of the EU Ecolabel**. This has a number of purposes:

- (1) staff will have a better understanding of the importance of the environmental actions taken by the tourist accommodation; and
- (2) staff will be able to respond to any guest queries about the EU Ecolabel.

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

This criterion has also been updated as a response to the updates proposed for Criterion 20: disposable products.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Proposal for revised criterion:

Staff training

(...)

Concerning the EU Ecolabel for tourist accommodation:

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

Concerning **disposable products**:

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

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

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

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 26: Staff training

Proposal for revised criterion:

Staff training

(...)

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

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

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

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 27: Information to guests

Current criterion:

Information to guests

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

Specific actions for the different areas shall be:

Concerning **energy**:

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

(...)

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Current criterion:

Information to guests

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**:

- 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.
- 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.

A&V: declaration of compliance + 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.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 27: Information to guests

Feedback: Collecting feedback can be difficult; many guests, for example, may not wish to spend time providing information during their holiday period.

Where information is collected, the accommodation should be able to show how this feedback is evaluated.

Criterion to be updated to place an emphasis on tourist accommodation sites actively evaluating feedback and making changes where required.

This criterion will also be updated to include quality criteria, or customer experience.

It is suggested that this criterion is updates to take into account:

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

The proposal for the updated criterion includes this quality aspect.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 27: Information to guests

Proposal for revised criterion:

Information to guests

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

(..)

Concerning customer satisfaction:

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

Assessment and verification: (...)

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 28: Energy and water consumption

Current criterion:

Energy and water consumption data

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

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

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

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

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 28: Energy and water consumption data

BEMP: *“Undertake an energy audit and monitor energy consumption across key energy-consuming processes and areas*

Feedback: current indicators (guests/m²) should be revised.

Suggested indicators include:

- heat consumption per HDD (CDD),
- water consumption per guest (exclude pool),
- energy consumption per overnight stay and meals cooked.

The Nordic Swan: Water (litres/guest-night) and Energy

- Option 1: Electricity and heating consumption per year and square metre,
- Option 2: Electricity and heating consumption per year and guest night

The criterion is proposed to remain as current criterion.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 29: Other data collection

Current criterion:

Other data collection

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

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

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

A&V: declaration of compliance + 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.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 29: Other data collection

Feedback: Suggestions for changes

- Very onerous and should be focussed on potentially harmful chemicals.
- To quantify litres and/or kg of unsorted waste produced is difficult to do

Proposal

Measurement of sorted waste, rather than unsorted.

- Waste will already be separated (where applicable) in accordance with Criterion 18 and 19
- Monitoring and evaluation of the measures and targets set within the environmental programme (Criterion 25).
- Useful to the tourist accommodation to facilitate better waste management.

Proposal for revised criterion:

Other data collection

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

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 30: Information appearing on the eco-

Current criterion:

Information appearing on the eco-label

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

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

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

The criterion is proposed to remain as current criterion.

9. Discussions: Mandatory criteria related to General management

Criterion 28: Energy and water consumption data

Stakeholder comment: *'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?

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 93: EMAS registration, ISO certification of the tourist accommodation

Current criterion:

EMAS registration (3 points), ISO certification (2 points) of the tourist accommodation

The **tourist accommodation** shall be registered under the Community eco-management and audit scheme (**EMAS**) (3 points) **or** certified according to **ISO 14001 standard** (2 points).

Assessment and verification: EMAS registration or ISO 14001 certification.

- EMAS registration and ISO 14001 certification are still in force and so no update is required.
- No comments were received regarding this criterion.

The criterion is proposed to remain as current criterion

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 94: EMAS registration, ISO certification of suppliers

Current criterion:

EMAS registration (1.5 points) or ISO certification (1 point) of suppliers

At least **one of the main suppliers or service providers** of the tourist accommodation shall be **registered with EMAS** (1.5 points) **or** certified according to **ISO 14001** (1 point).

Assessment and verification: EMAS registration or ISO 14001 certification by at least one of his main suppliers.

- EMAS registration and ISO 14001 certification are still in force and so no update is required.

The criterion is proposed to remain as current criterion.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 95: Compliance by subcontractors with mandatory criteria

Current criterion:

Compliance by subcontractors with mandatory criteria (up to 4 points)

Where additional **services** of food or leisure/fitness activities are **subcontracted**, those services shall comply with all the mandatory criteria of this Annex that apply to those specific services (2 point for each service of food and beverage and/or leisure facilities which is present on the tourist accommodation).

Assessment and verification: The applicant shall provide appropriate documentation of contractual agreements with his subcontractors regarding their compliance with the mandatory criteria.

BEMP: In addition to the provision of food and leisure activities (including saunas and swimming pools), BEMP includes provisions for effective management of laundry services.

It is suggested that reference is made to laundry services, in line with BEMP and LCA case studies.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 95: Compliance by subcontractors with mandatory criteria

Proposal for revised criterion:

Compliance by subcontractors with mandatory criteria (up to 4.5 points)

Where additional services of food, **laundry** or leisure/fitness activities are subcontracted, those services shall comply with all the mandatory criteria of this Annex that apply to those specific services (1.5 points for each service of food and beverage and/or laundry and/or leisure facilities which is present on the tourist accommodation).

Assessment and verification: (...)

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 96: Energy and water meters

Current criterion:

Energy and water meters (up to 2 points)

The tourist accommodation shall have **additional energy and water meters installed** so as to allow data collection on consumption of different activities and/or machines, such as rooms, laundry and kitchen service and/or specific machines like refrigerators, washing machines, etc. (1 point). Every pitch has its own energy and/or water meter (1 point).

A&V: detailed explanation + an analysis of the data collected (if already available).

- Suggestions included either removing this criterion or making this mandatory.
- BEMP encourages the use of meters to best identify possible efficiency improvements (reflected in the current EU Ecolabel criterion and so no update is required)
- Mandatory criterion 27: energy and water consumption data. This option criterion awards points for further investment in monitoring activities.

The criterion is proposed to remain as current criterion.



9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 97: Additional environmental actions

Current criterion:

Additional environmental actions (maximum 3 points)

Either:

(a) **Additional environmental actions** (up to 1.5 points each, to a maximum of 3 points): The management of the tourist accommodation shall take actions, additional to those provided for by way of criteria **in this Section or in Section A**, to improve the environmental performance of the tourist accommodation. The **Competent Body assessing** the application shall **attribute a score** to these actions **not exceeding 1.5 points per action**.

A&V: declaration of compliance + full description of each additional action the applicant

Or:

(b) **Eco-label award** (3 points): The tourist accommodation **shall be awarded one of the national or regional ISO Type I eco-labels**.

A&V: evidence of having been awarded an eco-label.

9. Revision of criteria and discussion: Mandatory and optional criteria related to **General management**

Criterion 97: Additional environmental actions

- Stakeholders suggested that social measures could be added here (however, social aspects have been included in Criterion 27).
- It is proposed that the **criteria remains**; this is an optional criterion and so does not restrict smaller sites from achieving the EU Ecolabel.

9. Discussions: Optional criteria related to General management

All optional criteria related to general management

Should the points allocation for the proposed criteria be adjusted?

Criterion 97: Additional environmental actions

Stakeholder comment: *'Perhaps we can add an optional criterion to enhance the social action carried out by the hotel.'*

**Should an additional social criterion be added for 'additional social actions'?
If yes, what examples of additional social action should be considered?**

Additional question related to general management

LCA publication revealed that these services might become a significant contributor to overall energy consumption and consequent GHG emissions of hotels (up to 30-40%).

Very few alternative ecolabels present criteria on green catering and laundry supply. The Nordic swan does have a separate criteria set for laundry services

Would optional Criterion 95: Compliance by subcontractors with mandatory criteria which is proposed to cover laundry services be enough?

**Should an additional criterion be added for 'green catering and laundry supply'?
If yes, should it be mandatory?**

10. Revision of criteria and discussion: Mandatory and optional criteria related to **Detergent and Disinfectants**

16. Chemical Toilet Disposal (CSS)
17. Disinfectants

64. Detergents

65. Indoor and outdoor paints and varnishes

66. Car washing in specially outfitted areas

67. Support to alternatives to artificial barbecue lighter

68. Swimming pools: Dosage of disinfectants or natural/ecological swimming pools

69. Mechanical cleaning

70. Organic gardening

71. Insect and pest repellents



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

Proposal for revised criterion:

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.

*A&V: 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.*

1. Stakeholder feedback was limited. This could be expanded to include all other types of accommodation. However, this criterion mainly concerns campsites and so it is suggested this is not made applicable to all TA.
2. BEMP refers directly to criterion 16: chemical toilet disposal point as an indicator for best environmental management of outdoor areas in campsites.

The criterion is proposed to remain as current criterion.

10. Revision of criteria and discussion: **Mandatory** and optional criteria related to **Detergent and Disinfectants**

Criterion 17: Disinfectants

Current criterion:

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

*A&V: The applicant shall provide a declaration of compliance with this criterion, together with an **indication of where and when disinfectants are used.***

1. Limit should be set for the amount of disinfectant allowed. However, that it will be problematic to develop a limit which is applicable to the range of tourist accommodation types in scope.
2. Apart from guidance on dosing of products and the use of EU Ecolabel products (this is covered in Criterion 61: indications on water hardness, and Criterion 64: detergents of the EU Ecolabel), there is **no specific BEMP prohibiting the use of disinfectants**

The criterion is proposed to remain as current criterion.



Criterion 64: Detergents

Current criterion:

Detergents (up to 3 points)

At least **80% by weight of hand dishwashing detergents and/or detergents for dishwashers and/or laundry detergent and/or all purpose cleaners and/or sanitary detergents and/or soaps and shampoos** used by the tourist accommodation shall have been awarded the **Community eco-label or other national or regional ISO Type I eco-labels** (1 point for each of these categories of detergents up to a maximum of 3 points).

*A&V: The applicant shall provide **data and documentation** (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.*

Feedback:

- The title of the criterion should be changed as soaps and shampoos (included in the list of products) are not detergents.
- Vinegar and other natural cleaning products could be included.

BEMP: “at least 70% of the purchase volume of chemical cleaning products (excluding oven cleaners) for dish washing and cleaning are Ecolabelled”.

Criterion 64: Detergents

Proposal for revised criterion:

Detergents and toiletries (up to 3 points)

At least 80% by weight of hand dishwashing detergents and/or detergents for dishwashers and/or laundry detergent and/or all purpose cleaners and/or sanitary detergents and/or soaps and shampoos used by the tourist accommodation shall have been awarded the EU eco-label or other national or regional ISO Type I eco-labels (1 point for each of these categories of products up to a maximum of 3 points).

Assessment and verification: (...)

This criterion meets the BEMP threshold.

This criterion should relate to shampoos as well as detergents and so the title should be changed to reflect this.

'Natural products' may be hard to define and it may be difficult to find products which have undergone the same assessment as those classified as type-I labels. In turn, this would make verification difficult.

10. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Detergent and Disinfectants**

Criterion 65: Indoor and outdoor paints and varnishes

Current criterion:

Indoor and outdoor paints and varnishes (up to 2 points)

At least **50% of the indoor and/or outdoor painting** of the tourist accommodation shall be done with indoor and/or outdoor paints and varnishes awarded the **Community eco-label or other national or regional ISO Type I eco-labels** (1 point for indoor, 1 for outdoor paints and varnishes).

*A&V: 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.*

BEMP: BEMP does not specifically apply to paints and varnishes use, but air quality should be considered in general.

Confusion at the verification stage. It is unclear whether the tourist accommodation building must *currently* be decorated with at least 50% Ecolabelled paints, or whether this applies to decorating and renovations *after* the application to EU Ecolabel.

10. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Detergent and Disinfectants**

Criterion 65: Indoor and outdoor paints and varnishes

The criterion is proposed to be maintained with no changes made.

Corresponding User Manual., for example:

'Points can only be awarded for this criterion where the use of Ecolabelled paints can be verified. Where Ecolabelled paint has already been used, the tourist accommodation must be able to: indicate which areas of the building have been painted with this Ecolabelled paint (and estimate this as a percentage of the total building), and specify which brand of paint was used (providing relevant receipts/invoices). Where decorating/renovations are yet to be carried out, receipts/invoices should be kept as evidence that Ecolabelled paints have been used. Picture evidence would also be useful to show that Ecolabelled paint is being used. If paint is stored on site, this will be checked during any site visit.'

10. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Detergent and Disinfectants**

Criterion 66: Car washing only in specially outfitted areas

Current criterion:

Car washing only in specially outfitted areas (1 point)

Car washing shall not be allowed, or shall be allowed only in areas which are specially equipped to collect the water and detergents used and channel them to the sewerage system.

A&V: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.

1. No stakeholder feedback was received regarding this criterion.
2. No changes to BEMP regarding car washing have been made – this assumes that that current criterion is still relevant.

The criterion is proposed to remain as current criterion.

10. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Detergent and Disinfectants**

Criterion 67: Support to alternatives to artificial barbecue lighter

Current criterion:

Support to alternatives to artificial barbecue lighter (1 point)

Excluding artificial barbecue lighting products, alternative products such as rape seed oil, hemp products, shall be sold in shops.

A&V: The applicant shall provide a declaration of compliance with this criterion.

1. The only suggestions being that perhaps this is of little relevance to most tourist accommodation sites.
2. BEMP does not provide specific guidance on the use of alternatives to artificial barbeque lighters.
3. No new products are available on the market which may be used as other alternatives to barbeque lighters.

The criterion is proposed to remain as current criterion.

10. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Detergent and Disinfectants**

Criterion 68: Dosage of disinfectants or natural/ecological swimming pools

Current criterion:

Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (1 point)

The swimming pool shall have an **automatic dosage system** that uses the minimum amount of disinfectant for the appropriate hygienic result (1 point).

Or

The swimming pool shall be of the **ecological/natural type** with only natural elements guaranteeing for the hygiene and safety of the bathers (1 point).

A&V: The applicant shall provide a technical documentation concerning the automatic dosage system or the type of ecological/natural swimming pool and its maintenance.

1. The only stakeholder feedback received highlighted the costs involved in installing natural swimming pools.
2. BEMP for swimming pools outlines best practice measures as:
 - Installation of, or conversion of an existing pool to, a natural pool.
 - Installation of automatic dosing.

The criterion is proposed to remain as current criterion.

Criterion 69: Mechanical cleaning

Current criterion:

Mechanical cleaning (1 point)

The tourist accommodation shall have precise **procedures for conducting chemical-free cleaning**, such as use of micro-fibre products or other non-chemical cleaning materials or activities with similar effects.

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

Feedback: It was suggested that ‘mechanical cleaning’ should be better defined and should allow the use of natural products.

BEMP: There is no specific BEMP guidance on mechanical cleaning

“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.”

10. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Detergent and Disinfectants**

Criterion 69: Mechanical cleaning

Proposal for revised criterion:

Mechanical cleaning (1 point)

The tourist accommodation shall have precise procedures for conducting chemical-free cleaning, such as use of micro-fibre products or other non-chemical cleaning materials or activities with similar effects. To fulfil this criterion, all cleaning must be carried out without the use of chemicals except where required by law or by hygiene or health and safety practices. Note that the use of water is acceptable as a 'chemical-free cleaning' method.

Assessment and verification: (...)

Currently the criterion is unclear as to how much cleaning must be undertaken manually to obtain points.

It is proposed that the requirements for this criterion are clarified.

10. Revision of criteria and discussion: Mandatory and **optional** criteria related to **Detergent and Disinfectants**

Criterion 70: Organic gardening

Current criterion:

Organic gardening (2 points)

Outside areas shall be managed either without **any use of pesticides or according to organic farming principles**, as laid down in Council Regulation (EC) No 834/2007, or as laid down in national law or recognised national organic schemes.

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

1. Regulation (EC) No 834/2007 is still in force and so no update is required.
2. No feedback was received regarding this criterion.

The criterion is proposed to remain as current criterion.



Criterion 71: Insect and pest repellents (up to 2 points)

Current criterion:

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).

A&V: The applicant shall provide a detailed explanation how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation if relevant.

Feedback:. Points should be offered for not using insect repellent at all.

BEMP: does highlight that pesticide use should generally be reduced.

No EU Ecolabel has been developed for this category of products. It is proposed to delete the reference.

10. Discussions: Optional criteria related to Detergent and Disinfectants

All optional criteria related to water

Should the points allocation for the proposed criteria be adjusted?

Criterion 64: Detergents

Stakeholder comment: *'The "natural products" could be quite easily defined as "water solutions of weak organic acids which can be used as food, such as vinegar or citric acid".'*

**Should 'natural products' be allowed to be used under this criterion?
If yes, is the proposed definition acceptable?**

Criterion 71: Insect and pest repellents

Stakeholder comment: *'It should be specified in the text that mosquito nets must be available in all rooms or bungalows.'*

Should the provision of mosquito nets in all rooms be required to meet this criterion?

11. Conclusion, next steps and closure of the workshop

Next steps?

Following on from this AHWG meeting

- Draft minutes will be circulated
 - - Please check them for accuracy, we will give a deadline
- Deadlines for written comments:
 - Friday 28th November 2014
- March 2015: EUEB progress report
- 2nd AHWG meeting ~ 1st half 2015

Thanks for your attention



Contact: Candela Vidal-Abarca Garrido

Tel. +34 954 48 84 86

e-mail candela.vidal-abarca-garrido@ec.europa.eu