

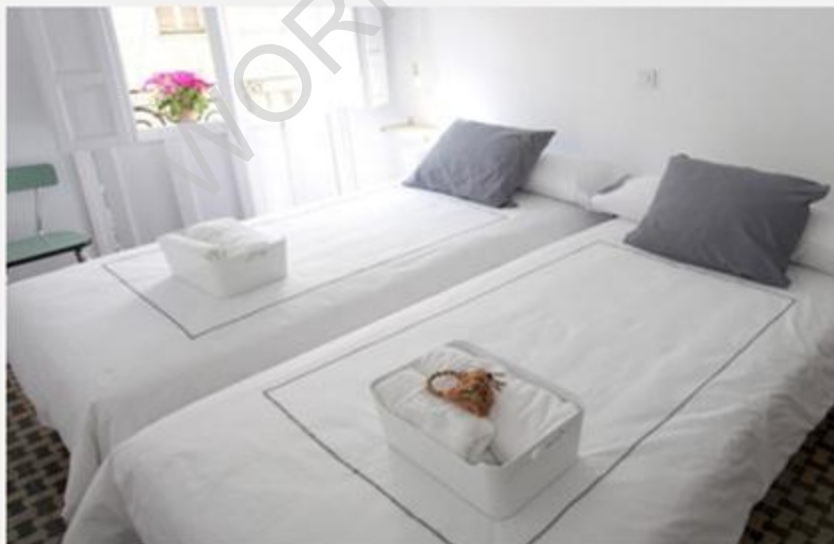
J R C T E C H N I C A L R E P O R T S

# Revision of European Ecolabel Criteria for Tourist Accommodation and Campsite services

Technical Report:  
Draft criteria proposal for revision of ecological criteria

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WORKING DRAFT IN PROGRESS

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## EXECUTIVE SUMMARY

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

The report consists of the following sections:

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

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# 1 INTRODUCTION

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

## 1.1 Aim of this report

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

For each criterion (outlined in Section 2.2), the current text is provided, including assessment and verification requirements. A discussion, including rationale for changes or maintaining the criterion is then outlined – this incorporates information collected in the initial phases of this project, presented in the Preliminary Report. Any ‘feedback’ discussed at this stage of the report, refers to feedback from the stakeholder questionnaire, which was sent to a wide variety of organisations and government bodies engaged in the tourist accommodation industry. Where changes or updates are suggested, a proposal is made for the revised EU Ecolabel criterion, with changes underlined for comparison.

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

## 1.2 Summary of preliminary review for tourist accommodation

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

### 1.2.1 Scope and definition

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

#### 1.2.1.1 Merging TAS and CSS criteria

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

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

EU Ecolabel Criteria for TAS and CSS		Common criteria	Additional criteria
Mandatory criteria	Energy	✓	-
	Water	✓	-
	Detergents and Disinfectants	✓	-
	Waste		CSS includes additional criterion for: 16. Chemical toilet disposal points
	Other Services	✓	-
	General Management	✓	-
Optional criteria	Energy	✓	-
	Water	✓	-
	Detergents and Disinfectants		CSS includes additional criterion for: 66. Car washing in specially outfitted areas
	Waste		CSS includes additional criteria for: 75. Run-off from car parks 77. Regulation of Camp Site traffic
	Other Services		CSS includes additional criteria for: 78. Camp Site generated traffic 79. Trolleys for guests on the Camp Site 80. Unsealed surfaces
	General Management	✓	-

In order to obtain feedback on the current EU Ecolabel criteria for TAS and CSS, a questionnaire was sent to stakeholders including tourist accommodation and camp site service

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

### 1.2.1.2 Defining the product group

#### Current scope and definition:

##### **TAS:**

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

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

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

##### **CSS:**

*The product group ‘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.*

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

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

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

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

- Although there are a number of alternative labels for tourist accommodation, few of them provide a definition or scope outline of the type of organisation or service they are referring to. Where distinctions are made between types of tourist accommodation, and different criteria are developed, these focus on either the size of the hotel (Green Key provides separate criteria for small accommodation), or the services offered (Nordic Swan distinguished hotels from youth hostels as these offer different service levels). The distinction between campsite and hotel is also made by Green Key criteria. Generally, definitions provided are broad.
- Very few formal definitions or scope documents for tourist accommodation or related accommodation provision have been developed. The types of accommodation (e.g.



hotel, bed and breakfast or hostel) are often separately defined, however. To maintain consistency with other definitions and categorisations of tourist accommodation, the EU Ecolabel should include these varying types of accommodation in scope.

- Where more detailed definitions (such as NACE codes) have been developed, these define tourist accommodation in a similar way to the current EU Ecolabel criteria – definitions relate to specific characteristics such as to the provision of sheltered accommodation (or pitches for camp sites) or the types of services that are offered (such as the provision of food services). The current scope and structure of the TAS and CSS definitions should therefore be maintained for the merged product group, tourist accommodation.

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

**Table 2: Types of tourist accommodation**

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

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

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

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

1. Merging of TAS and CSS (although separate definitions should still be maintained for each)
2. The addition of conference facilities to services provided.

The merged product group ‘tourist accommodation’ will be defined as:

### Revised scope and definition:

*The product group “tourist accommodation” comprises:*

#### *The provision of tourist accommodation services and/or campsite services*

##### **Tourist accommodation services:**

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.

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.*

## 1.2.2 Market analysis

A market analysis has also been undertaken for the product group ‘tourist accommodation’ to determine any market trend, initiatives or innovations which may need to be considered in a revision of the EU Ecolabel. Summary points include:

- The EU-28 accommodation sector (defined by NACE 2 codes 55.1, 55.2, 55.3) employs over 2 million people through around 250,000 enterprises and generated €136 million in turnover in 2010. The market is dominated by hotels, whereas campsites only account for a small (*ca.* 6% of total accommodation) proportion of the sector.
- Four EU-28 countries are responsible for more than 50% of both the turnover and the number of people employed within the accommodation sector. These are Germany, France, the UK and Italy. Spain is also significant in the sector.
- It is generally accepted that the market and demand for sustainable tourism is growing; however, no official statistics are available to document this shift, particularly regarding

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the market share of sustainable accommodation businesses. Data available is mainly related to consumer surveys.

- A Trip Advisor survey found that 79% of travellers globally “think that it’s important that accommodation providers have eco-friendly practices”. 91% of accommodation providers agreed that it is important to be eco-friendly but only 77% responded they have environmentally friendly policies in place. As reported by Deloitte, 95% of business travellers surveyed responded that the hotel industry should be undertaking green initiatives and that sustainability will become a core issue in the hospitality industry in 2015.
- The ten major European hotel chains (Accor, Best Western, Intercontinental Hotels Group, Groupe du Louvre, Carlson Rezidor Hotel Group, NH Hoteles, Whitbread Hotels & Restaurants, Melia International, Hilton Worldwide, TUI Hotels and Resorts) have all shown a commitment towards reducing their environmental impact. This shows that environmental awareness is becoming an important factor within the accommodation industry. Many of the actions taken by these enterprises match the EU Ecolabel criteria for tourist accommodation services.
- Examples include the use of 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. These are principally used for cleaning products. For example, Accor has a target for 85% of its hotels to use eco-labelled products including cleaning products, paints and floor coverings, to ensure healthy interiors for customers.
- Finally, many of these companies are working towards achieving third-party certification to recognise their efforts to reduce their environmental impact. The most notable example is the Carlson Rezidor Hotel Group that is aiming to gain accreditation for 100% of its hotels by 2015. A number of environmental labels (the Austrian Ecolabel, the Green Key scheme, the Green Tourism Business Scheme and the Nordic Swan Ecolabel) specific to the tourism sector have been used. However, Best Western France and Austria are the only ones among the leading hotel chains choosing to use the EU Ecolabel.

### 1.2.3 Key environmental impacts and improvement potential

The current EU Ecolabel (for both TAS and CSS) states that:

EU Ecolabel aim (current criteria):

*These criteria aim to set limits on the main environmental impacts from the three phases of the service’s life cycle of campsite service/tourist accommodation service (purchasing, provision of the service, waste). In particular they aim to:*

- *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.*

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Importantly, the EU Ecolabel criteria should be based on scientific evidence and should focus on the most significant environmental impacts during the whole life cycle of products. The aims of the EU Ecolabel should align with these impacts.

To determine whether the EU Ecolabel covers the most significant impacts for tourist accommodation, a number of sources were considered including: a recent report by the IPTS on best environmental management practice (BEMP) in the tourism sector [JRC IPTS (2013)]; a number of relevant LCAs and several alternative eco-labels (The Nordic Swan, The Austrian Ecolabel (Das Österreichische Umweltzeichen), Green Key, Travelife Sustainability Criteria, Green Tourism Business Scheme (GTBS), Global Sustainable Tourism Criteria (GSTC) for ‘Hotels and Tour Operators’, Ecolabel Malta, Green Globe and Green Seal).

The BEMP report was particularly relevant, and identified the most important environmental aspects for tourist accommodation as:

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.

A comparison of the EU Ecolabel with BEMP, showed that the current criteria for tourist accommodation align with the significant environmental impacts of tourism. (Annex I provides a more detailed comparison of BEMP with the EU Ecolabel TAS and CSS criteria).

The main environmental aspects identified in the LCA review match with the hot spots described in the best environmental management practice (BEMP) report; both of these sources identify electricity consumption during the operating phase as the major environmental impact of tourist accommodation. However, it should be noted that many of the 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 BEMP document is being used as a reference to update the criteria. Nevertheless all of the aspects identified in the LCA review will be considered throughout the criteria update, and will be outlined in the Technical Report.

As no new environmental impacts have been identified, 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*

Importantly, the EU Ecolabel also includes criterion which facilitate improvements in these areas through, for example: data collection, policy setting, provision of information to guests and staff training. This relates to all criteria under the section:

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

However, a number of the existing EU Ecolabel criteria will need to be revised or updated. In some cases, new criteria may need to be added to fill any gaps which have been identified in the Market analysis (Task 2) and the Technical analysis (Task 3) of the preliminary report.

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## 2 EXAMINATION OF SPECIFIC CRITERIA

### Summary:

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

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

The aim of this section is not, to justify the current criteria but to identify any updates required (including any deletions), by reference to new regulations or directives, revised best environmental management practice and other market changes which have occurred since 2008. Stakeholder feedback has also been taken into account in determining if changes need to be made.

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

Finally, the impact of any proposed changes is outlined in Section 2.3.

### 2.1 Summary of updates to criteria

Table 3 lists all of the current EU Ecolabel criteria for TAS and CSS, and identifies whether these have been updated, removed or remain the same.

This is based on a review of relevant regulation, stakeholder feedback, best environmental management practice (BEMP) for tourist accommodation and any other new information made available since the 2008 criteria revision for TAS and CSS. For a number of criterion (those marked with an asterisk (\*)) several proposals have been developed which require further stakeholder consultation. Section 2.2 provides a more comprehensive guide to each of these.

**Table 3: Summary of updates to current EU Ecolabel criteria for TAS and CSS**

		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	✓	✓								
7	Switching off heating or air conditioning						✓				
8	Switching off lights						✓				
9	Energy efficient light bulbs	✓	✓	✓							
10*	Outside heating appliances		✓								
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						✓				
16	Chemical toilet disposal (campsite only)						✓				
17	Disinfectants						✓				
18	Waste separation by guests		✓								
19	Waste separation	✓									
20	Disposable products		✓	✓	✓						
21	Breakfast packaging		✓	✓							
22	No smoking in common areas*								✓		
23	Public transportation		✓								

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

		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
44	Energy efficient refrigeration, ovens, dishwashers, washing machines, dryers/tumblers and office equipment	✓	✓	✓							
45	Electric hand and hair dryers with proximity sensor		✓			✓					
46	Refrigerator positioning					✓					
47	Automatic switching off lights in rental accommodation					✓					
48	Sauna timer control					✓					
49	Swimming pool heating with renewable energy sources					✓					
50	Automatic switching off outside lights					✓					
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 timer					✓					
59	Swimming pool cover		✓	✓							
60	De-icing					✓					



		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
61	Indications on water hardness						✓				
62	Water saving urinals						✓				
63	Indigenous species used for new outdoor planting						✓				
64	Detergents		✓								
65*	Indoor and outdoor paints and varnishes					✓					
66	Car washing only in specially outfitted areas (campsites only)						✓				
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 repellent						✓				
72	Composting						✓				
73	Disposable drinks containers						□□□□□		✓		✓
74	Fat/oil disposal							✓			✓
75	Run-off from car parks						✓				
76	Used textiles, furniture and other products						✓				
77	Regulation of campsite traffic (campsite only)						✓				
78	Campsite generated traffic (campsite only)						✓				
79	Trolleys for guests on the campsite (campsite only)						✓				
80	Unsealed surfaces						✓				

		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
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	✓									
93	EMAS registration, ISO certification of the tourist accommodation						✓				
94	EMAS registration, ISO certification of suppliers						✓				
95	Subcontractors' compliance with mandatory criteria		✓			✓					
96	Energy and water meters						✓				
97	Additional environmental actions						✓				
<b>New criteria include:</b>											
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.										

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## 2.2 Changes to existing criteria

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

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

### 2.2.1 Mandatory criteria related to energy

#### 2.2.1.1 Criterion 1: Electricity from renewable sources

Current criterion:
<p><b>Electricity from renewable sources</b></p> <p>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.</p> <p>This criterion does not apply to tourist accommodations that have no access to a market that offers electricity generated from renewable energy sources.</p> <p>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.</p> <p><i>Assessment and verification: The applicant shall supply a declaration from (or the contract with) the electricity supplier indicating the nature of the renewable energy source(s), the percentage of electricity supplied that is from a renewable source, documentation on the boilers (heat generators) used, if any and an indication of the maximum percentage that can be supplied. According to Directive 2001/77/EC, renewable energy sources shall mean renewable non-fossil energy sources (wind, solar, geothermal wave, tidal, hydro power, biomass, landfill gas, sewage treatment plant gas and biogases). In case the tourist accommodation have no access to a market that offers energy from renewable energy sources, documentation demonstrating the request for renewable energy has to be supplied.</i></p>

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**Regulation:**

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

*“energy from renewable sources’ means energy from renewable non-fossil sources, namely wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases”*

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

**Feedback:**

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

**BEMP:**

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

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

**Proposed updates:**

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

**Proposal for revised criterion:****Electricity from renewable sources**

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

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

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

*Assessment and verification: The applicant shall supply a declaration from (or the contract with) the electricity supplier indicating the nature of the renewable energy source(s), the percentage of electricity supplied that is from a renewable source, documentation on the boilers (heat generators) used, if any and an indication of the maximum percentage that can be supplied. According to Directive 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.*

## Consultation comments and discussion points:

Stakeholder comment	Discussion points
<p><i>'The meaning of 'no access to a market' should be specified. Does this refer to a national market?'</i></p> <p><i>'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. As is the case for Guadeloupe, where no local production of renewable energy is available. Would this be considered as 'no access' or would the French market be taken into account?'</i></p> <p><i>'In addition, many Mediterranean countries such as Jordan, Egypt and Tunisia are interested in the European Ecolabel. They have no access to a market that offers electricity from renewable energy sources. Would this criterion not be applicable?'</i></p>	<p>How should 'no access to a market' be defined?</p>
<p><i>'First and only pan-European ecolabel for electricity: EKOenergy. (<a href="http://www.ekoenergy.org">www.ekoenergy.org</a>). EKOenergy is a young network of 34 environmental NGOs from 26 European countries. We focus on the promotion of green electricity.</i></p> <p><i>The newest European version of the LEED Standard for Existing Buildings – Operations and Maintenance states: "The EKOenergy electricity certification scheme represents the best available pan-European option for the sustainable and additional consumption of renewable electricity within Europe".</i></p> <p><i>An ecolabel is one of the best ways to prove that the purchase has value added as compared to a business as usual scenario.'</i></p>	<p>Should it be possible (or be encouraged) to refer to ecolabelled electricity?</p>

Additional information	Discussion points
<p>The LCA literature mentions the current criteria on energy; specifically concerning the statement "no access to a market that offers electricity generated from renewable energy sources". 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)]</p>	<p><i>(Note, Optional criterion 31: Generation of electricity through renewable energy sources addresses the potential of tourist activities in generating energy.)</i></p> <p>Should the self-generation of energy be addressed in mandatory criteria 1: Electricity from renewable sources?</p>

### 2.2.1.2 Criterion 2: Coal and heavy oils

#### Current criterion:

#### Coal and heavy oils

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

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

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

## **Feedback:**

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

The criterion will remain as:

<b>Proposal for revised criterion:</b>
<p><b>Coal and heavy oils</b></p> <p>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.</p> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, indicating the nature of the energy sources used.</i></p>

## **Consultation comments and discussion points:**

<b>Additional information</b>	<b>Discussion points</b>
<p>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)]</p>	<p>Stakeholders are invited to provide additional information concerning to the access to low sulphur grade heating oil supply.</p>

### **2.2.1.3 Criterion 3: Efficiency and heat generation**

<b>Current criterion:</b>
<p><b>Efficiency and heat generation</b></p> <p>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.</p> <p>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.</p> <p><i>Assessment and verification: The applicant shall provide a technical specification from those responsible for the sale and/or maintenance of the boiler indicating its efficiency.</i></p>

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### **Regulation:**

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

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

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

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

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

### **Feedback:**

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

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

### **BEMP:**

The best environmental practice for heat generation is:

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

### **Other updates:**

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

### **Proposed update:**

The following update is proposed:

#### **Proposal for revised criterion:**

##### **Efficiency and heat generation**

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

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

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 812/2013 with regard to the energy labelling of water heaters, hot water storage tanks and packages of water heater and solar device.

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

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



## Consultation comments and discussion points:

Stakeholder comment	Discussion points
<i>'It would be useful to add wood boilers, because they are increasingly used in France and the efficiency can also be calculated.'</i>	Should wood boilers be included in this criterion?
<i>'The latest regulation has introduced a lettering system (rather than star rating) for boilers. The effects of this on existing licence holders and new applicants' needs to be considered.'</i>	How should existing licence holders (with 3 Star boilers or equivalent) -be treated when a change in regulation which means all new boilers are letter rated (A+ to F) and a higher efficiency is expected?  How should the criterion be updated to reflect this change?

### 2.2.1.4 Criterion 4: Air conditioning

#### Current criterion:

#### Air conditioning

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

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

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

#### **Regulation:**

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

#### **Feedback:**

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

#### **BEMP:**

The best environmental practice for air conditioning is:

*“To minimise energy consumption from HVAC systems by installing zoned temperature control and controlled ventilation with heat recovery (ideally controlled by CO<sub>2</sub> sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics.*

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

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

**Other updates:**

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

**Proposed updates:**

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

**Proposal for revised criterion:**

**Air conditioning**

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

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

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

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

**Current criterion:**

**Energy efficiency of buildings**

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

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

**Regulation:**

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

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**Feedback:**

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

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

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

**BEMP:**

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

**Proposed updates:**

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

The proposed update for this criterion is:

**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.*

**Consultation comments and discussion points:**

Stakeholder comment	Discussion points
<i>There is a discrepancy in the current wording (of the suggested update) and Assessment and verification. The former requires complying with the legislation, the latter goes beyond it. It should be clear from the criterion itself that either the energy certification or the energy audit is required for any building.'</i>	Should this criterion require energy certification under Directive 2010/31/EU or the results of an energy audit?

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### 2.2.1.6 Criterion 6: Window insulation

#### **Current criterion:**

##### **Window insulation**

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

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

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

#### **Regulation:**

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

#### **Feedback:**

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

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

#### **BEMP:**

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

#### **Proposed updates:**

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

The updated criterion is as follows:

**Proposal for revised criterion:**

**Window insulation**

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

All windows in heated and/or air conditioned rooms and common areas added or renovated after the acquisition of the 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.

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

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

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

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

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

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

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

## 2.2.1.7 Criterion 7: Switching off heating or air conditioning

### Current criterion:

#### Switching off heating or air conditioning

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

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

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

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

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

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

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

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

It is therefore proposed that the criterion remain as:

### Proposal for revised criterion:

#### Switching off heating or air conditioning

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

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

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

### 2.2.1.8 Criterion 8: Switching off lights

#### Current criterion:

##### Switching off lights

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

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

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

1. Very little stakeholder feedback was received regarding this criterion; much of the feedback suggested that this was just common sense. However, the criterion will be maintained as lighting can be a significant user of energy within tourist accommodation.
2. BEMP is to “install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural-light and time.” The EU Ecolabel criterion reflects this and specifies the actions which must be taken where this types of system is not installed.

The criterion is therefore proposed to remain as:

#### Proposal for revised criterion:

##### Switching off lights

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

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

### 2.2.1.9 Criterion 9: Energy efficient light bulbs

#### Current criterion:

##### Energy efficient light bulbs

- (a) At least 80% of all light bulbs in the tourist accommodation shall have an energy efficiency of Class A as defined in Commission Directive 98/11/EC. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.
- (b) 100% of light bulbs that are situated where they are likely to be turned on for more than five hours a day shall have an energy efficiency of Class A as defined by Directive 98/11/EC. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.

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

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### **Regulation:**

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

The existing criterion should be updated to reflect this.

### **Feedback:**

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

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

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

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

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

### **Proposed updates:**

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

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

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

The following revised criterion is therefore proposed:



## Proposal for revised criterion:

### Energy efficient light bulbs

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

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

At the end of Year 1:

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

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

At the end of Year 2:

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

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

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

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

## Consultation comments and discussion points:

Stakeholder comment	Discussion points
<i>'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.'</i>	Is it a requirement that Competent Bodies verify compliance with this criterion after two years or is the declaration of conformity sufficient?

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### 2.2.1.10 Criterion 10: Outside heating appliances

#### **Current criterion:**

##### **Outside heating appliances**

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

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

#### **Regulation:**

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

#### **Feedback:**

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

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

#### **BEMP:**

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

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

#### **Proposed updates:**

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

##### **Option 1:**

This criterion is maintained and, following BEMP practices, restricts the use of outdoor heating to the use of stand-alone appliances powered by renewable energy. However, the criterion does need to more clearly define ‘renewable energy’ in this context, and should specifically state that

this refers to on-site, stand-alone renewable energy generation devices. This will need to be clearly defined in the assessment and verification of the proposed revision to this criterion.

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

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

**Outside heating appliances**

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

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

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

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

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

**Option 2:**

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

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

**Outside heating appliances**

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

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

**Consultation comments and discussion points:**

Proposed changes to criterion	Discussion points
<p>Two options have been proposed for this criterion:</p> <ol style="list-style-type: none"> <li>1. Allow outside heating appliances which are powered by renewable energy.</li> <li>2. Ban all outside heating appliances.</li> </ol>	<p>Which option is preferred? (note that 4 stakeholders have commented on this – 2 favour Option 1, and 2 favour Option 2.)</p>

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## 2.2.2 Mandatory criteria related to water

### 2.2.2.1 Criterion 11: Water flow from taps and showers

#### Current criterion:

##### Water flow from taps and showers

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

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

#### Feedback:

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

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

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

#### BEMP:

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

#### Other updates:

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

*The EU Ecolabel for sanitary tapware (Commission Decision 2013/250/EU of 21 May 2013) refers to different types of taps. Table 1 and Table 3 (referred to in Criterion 11 for tourist accommodation) specify water flow rate limits for each type of tap. These should be referred to when providing documentation for your application. The EU Ecolabel for tapware can be found at:*

<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013D0250>

#### Proposed update:

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

### Proposal for revised criterion:

#### Water flow from taps and showers

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

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

### Consultation comments and discussion points:

Stakeholder comment	Discussion points
<i>'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).'</i>	Do you agree that an average maximum water flow for taps and showers be set (as for the existing criterion)?
<i>'We think the explicit values should be included in the criterion.'</i>	Do you agree that the maxima and minima be explicitly quoted in the criterion?

#### 2.2.2.2 Criterion 12: Waste bins in toilets

##### Current criterion:

##### Waste bins in toilets

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

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

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

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

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The criterion will remain as:

**Proposal for revised criterion:**

**Waste bins in toilets**

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

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

**2.2.2.3 Criterion 13: Urinal flushing**

**Current criterion:**

**Urinal flushing**

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

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

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

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

The criterion will remain as:

**Proposal for revised criterion:**

**Urinal flushing**

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

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

#### 2.2.2.4 Criterion 14: Changing towels and sheets

##### Current criterion:

##### Changing towels and sheets

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

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

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

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

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

The criterion will remain as:

##### Proposal for revised criterion:

##### Changing towels and sheets

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

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

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

## 2.2.2.5 Criterion 15: Correct waste water disposal

### Current criterion:

#### Correct waste water disposal

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

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

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

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

This criterion will therefore be included without revision:

### Proposal for revised criterion:

#### Correct waste water disposal

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

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



## Consultation comments and discussion points:

Stakeholder comment	Discussion points
<i>'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'</i>	Should this criterion be removed?

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

#### Proposal for revised criterion:

##### Chemical toilet disposal point (CDP) (campsites only)

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

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

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

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

The criterion will remain as:

#### Proposal for revised criterion:

##### Chemical toilet disposal point (CDP) (campsites only)

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

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

## 2.2.2.7 Criterion 17: Disinfectants

### Current criterion:

#### Disinfectants

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

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

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

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

The criterion will remain as:

### Proposal for revised criterion :

#### Disinfectants

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

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

## 2.2.3 Mandatory criteria related to waste

### 2.2.3.1 Criterion 18: Waste separation by guests

#### Current criterion:

#### Waste separation by guests

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

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

#### Feedback:

There was some conflicting feedback about this criterion. Some respondents outlined difficulties in providing enough containers, whereas others suggested the criterion was

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important and should be clearly communicated to guests. In general, it was suggested that it should be specified how many containers are ‘adequate’.

**BEMP:**

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

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

**Proposed update:**

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

The following is therefore suggested:

<b>Proposal for revised criterion:</b>
<p><b>Waste separation by guests</b></p> <p>Guests shall be informed how and where they can separate waste according to the best local or national systems within the geographic area in which the tourist accommodation is situated. Adequate containers for waste separation shall be available in the rooms or within easy reach; <u>as a minimum, containers should be available on each floor and/or in each block of the tourist accommodation.</u></p> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the information to guests and explaining where containers are located in the tourist accommodation.</i></p>

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### 2.2.3.2 Criterion 19: Waste separation

#### Current criterion:

##### Waste separation

Waste shall be separated into the categories that can be handled separately by the local or national waste management facilities, with particular care regarding hazardous waste, which shall be separated, collected and disposed of as listed in Commission Decision 2000/532/EC and appropriate disposal shall be sought. This list includes toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances as specified in Directive 2002/96/EC of the European Parliament and of the Council and Directive 2002/95/EC of the European Parliament and of the Council.

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

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

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

#### **Regulation:**

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

#### **Feedback:**

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

#### **BEMP:**

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

#### **Proposed update:**

The current criterion is appropriate to meet BEMP guidance. It would, however, be beneficial to clearly outline the following under Criterion 19 (Further explanation of this is outlined in section 2.2.9.3, Criterion 74).

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

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**Proposal for revised criterion:****Waste separation**

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

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

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

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

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

**2.2.3.3 Criterion 20: Disposable products****Current criterion:****Disposable products**

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

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

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

**Feedback:**

46 comments were received about this criterion.

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

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

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

**BEMP:**

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

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

**Proposed updates:**

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

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

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

It is also important that this criterion is reflected in the staff training criterion (see Section 2.2.5.3) to ensure that products are not disposed of (for example, by cleaners) that could otherwise be used by the same guest(s) throughout their stay.

The following is proposed (changes are underlined):

**Proposal for revised criterion:**

**Disposable products**

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

The following exceptions apply:

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

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

*Assessment and verification:*

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

**Consultation comments and discussion points:**

Stakeholder comment	Discussion points
<i>'When we speak about quality rating scheme, does this include the requirements of standard private chains?'</i>	Are the standard operations of private chains included in the term 'quality rating scheme'?
<i>'We think this criterion should specify: 'on request at reception'.</i>	Do you agree with this proposal?
<i>'Are disposable towels in the carton box included in the definition?'</i>	What is the definition of 'disposable products'?

**2.2.3.4 Criterion 21: Breakfast packaging**

**Current criterion:**

**Breakfast packaging**

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

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

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**Feedback:**

66 comments we received on the criterion regarding breakfast packaging.

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

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

**BEMP:**

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

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

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

**Proposed updates:**

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

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

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

The following is therefore proposed (changes are underlined):

**Proposal for revised criterion:**



### **Food packaging**

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

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

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

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

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

### **Consultation comments and discussion points:**

Stakeholder comment	Discussion points
<i>'It would be nice, if it's possible to define more precisely the notion of perishable goods.'</i>	How should 'perishable food' be defined? Do you agree on the proposed definitions of perishable food?
<i>'In general, we don't like the idea to widen the group of food stuffs allowed in single use packaging.'</i> <i>'What is meant by perishable food stuffs?'</i> <i>'What about teabags, single serving packets of cocoa powder and sweeteners like Hermesetas? Are they allowed?'</i>	
<i>'How will Competent Authorities verify 'the documented procedure which outlines how both food and packaging waste are minimised'?''</i>	
<i>'How can we judge if the tourist accommodation has minimized both food and packaging waste by an acceptable way?'</i>	Is additional guidance required to explain this? if yes, what would an appropriate measurement be?

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## 2.2.4 Mandatory criteria related to other services

### 2.2.4.1 Criterion 22: No smoking in common areas

<b>Current criterion:</b>
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<b>No smoking in common areas</b>
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A no smoking section shall be available in all indoor common areas.
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<i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.</i>
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#### **Feedback:**

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

#### **BEMP:**

There is no BEMP for restricting smoking in tourist accommodation.

#### **Proposed updates:**

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

#### **Option 1:**

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

#### **Option 2:**

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

<b>Proposal for revised criterion, Option 2:</b>
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<b>No smoking in common areas</b>
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A no smoking section shall be available in all indoor common areas.
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<i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion.</i>
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### Option 3:

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

#### Proposal for revised criterion, Option 3:

##### No smoking in common areas

No smoking shall be allowed in any indoor common areas.

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

#### Consultation comments and discussion points:

Proposed changes to criterion	Discussion points
Three options have been proposed: 1. The criterion is removed 2. The criterion remains as it is – a no smoking section shall be available in all common areas 3. The criterion is tightened - no smoking is allowed in any common areas	Which is the preferred option?

#### 2.2.4.2 Criterion 23: Public transportation

##### Current criterion:

##### Public transportation

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

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

##### Feedback:

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

##### BEMP:

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

##### Proposed update:

It should be made clear that this criterion is only applicable to organisations where this infrastructure already exists – this is a mandatory criterion and not all tourist accommodation sites are in areas where public transportation is available. The second part of the criterion is proposed to be integrated as part of the information, instead of an alternative way where no

public transport is available. This will still maintain the aim of the criterion – to encourage and facilitate the use of public transport and other environmental preferable means of transport..

The following is therefore suggested:

Proposal for revised criterion:
<p><b>Public transportation</b></p> <p>Information shall be made easily available to the guests and staff on how to use public transportation to and from the tourist accommodation (<u>where available</u>), <u>together with information about other environmentally preferable means of transport (car sharing, bicycles, etc.)</u>.</p> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with copies of the information material available <u>e.g. on website, brochures etc.</u></i></p>

### Consultation comments and discussion points:

Additional information	Discussion points
<p>The LCA literature raised the importance of guest transportation (from home to home). It is suggested that more effective actions to promote the most environmentally-sound forms of transport, as well as actions to discourage the most polluting ones, should be included [Camillo De C. et al (2010a)].</p> <ul style="list-style-type: none"> <li>✓ <i>For example, train transportation could be promoted through campaigns and environmental marketing. There are several examples of different initiatives in this field. One of them, performed by Trenitalia and the Hotelier Association of Riccione, aims to promote train transport by refunding the cost of tickets to passengers who spend at least a week in one of the association's hotels during summertime.</i></li> <li>✓ <i>Regarding road transportation (Bus and cars), more environmentally-sound solutions should be promoted (e.g., LPG- and methane-fuelled vehicles, travelling in groups, car-pooling, etc.), whereas transport using petrol and diesel engines, or single-passenger car travel should be discouraged.</i></li> </ul>	<p>Should the current criteria be modified by adding additional requirements for the provision of information regarding preferable means of transport from home to home?</p>

### 2.2.4.3 Proposed new criterion: Local food products

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

#### Proposal for new criterion:

##### Local food products (mandatory)

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

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

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

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."

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

#### Consultation comments and discussion points:

Stakeholder comment	Discussion points
<i>'Ok, but perhaps it would be necessary to refer to a legal/official list per country?'</i>	Should this new criterion be added? If yes, should this be mandatory? Are there any other factors which need to be included?
<i>'If made mandatory, the examination of documentation must be precise and equal for every MS. I would ask how the other MS think to verify this criterion.'</i>	Do you agree with the proposed assessment and verification method?

## 2.2.4.4 Proposed new criterion: Fundamental principles and rights at work

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

Proposal for new criterion:
<p><b>Fundamental principles and rights at work (mandatory)</b></p> <p>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:</p> <p>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</p> <p><i>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.</i></p>

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

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

### Consultation comments and discussion points:

Stakeholder comment	Discussion points
<i>'It should be more clearly specified (perhaps in the User Manual) what sort of verification is regarded as independent. Who carries out such verifications?'</i>	Should this new criterion be added?
<i>'This criterion is a European regulation point. It's not the role of a Certification Body to check the regulation. It can be difficult to prove for the applicant. Besides, are the auditors skilled to evaluate that point properly?'</i>	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?
<i>'It would be good to set criteria for fundamental principles and rights at work, but for practical reasons we don't support this. With our resources it is impossible to verify and control these criteria.'</i>	

Stakeholder comment	Discussion points
<p>'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. For example:</p> <ol style="list-style-type: none"> <li>I. The hotel can give a bonus to a person which reduces the waste of the breakfast buffet.</li> <li>II. Help of the manager to fill the file of loan for the bank with the aim of a real estate purchase for the employee.</li> <li>III. Implementation of a shuttle in late hours for the travel of staff'</li> </ol>	

## 2.2.5 Mandatory criteria related to general management

### 2.2.5.1 Criterion 24: Maintenance and servicing of boilers and air conditioning systems

#### Current criterion:

#### Maintenance and servicing of boilers and air conditioning systems

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

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

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

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

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

#### **Regulation:**

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

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

**Feedback:**

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

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

**BEMP:**

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

Proposed update according to new legislation:

**Proposal for revised criterion:**

**Maintenance and servicing of boilers and air conditioning systems**

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

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

*Assessment and verification: The applicant shall provide a declaration of compliance with all parts of this criterion, together with a description of the appliances and their maintenance programme, and details of the persons/companies carrying out the maintenance, together with the certification according Article 10 of Regulation EU No 517/2014, and what is checked during the maintenance.*



## 2.2.5.2 Criterion 25: Policy setting and environmental programme

### Current criterion:

#### Policy setting and environmental programme

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

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

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

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

**This criterion does not require updating, and so it is proposed that no changes are made.**

**This is based on the following:**

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

The criterion shall remain as:

### Proposal for revised criterion:

#### Policy setting and environmental programme

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

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

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

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

### 2.2.5.3 Criterion 26: Staff training

#### **Current criterion:**

##### **Staff training**

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

Concerning energy saving:

— Staff shall be trained on how to save energy.

Concerning water saving:

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

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

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

Concerning chemical substances:

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

Concerning waste:

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

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

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

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

#### **Feedback:**

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

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**BEMP:**

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

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

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

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

**Proposed updates:**

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

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

This criterion has also been updated as a response to the updates proposed for Criterion 20: disposable products (see section 2.2.3.3):

**Proposal for revised criterion:****Staff training**

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

**Concerning the EU Ecolabel for tourist accommodation:**

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

**Concerning energy saving:**

- Staff shall be trained on how to save energy.

**Concerning water saving:**

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

Concerning chemical substances:

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

Concerning waste:

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

Concerning disposable products:

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

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

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

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

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

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

#### 2.2.5.4 Criterion 27: Information to guests

##### **Current criterion:**

##### **Information to guests**

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

Specific actions for the different areas shall be:

Concerning **energy**:

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

**Concerning water and waste water:**

— In the sanitary areas and bathrooms there shall be adequate information to the guest on how to help the tourist accommodation to save water.

— The guest shall be invited to inform the staff of any leak.

— In the toilets, signs shall request guests to dispose of their waste into the waste bins instead of the toilets.

— Guests shall be informed about the necessities and obligations of correct disposal of the waste water from their mobile means of lodging.

**Concerning waste:**

— The guest shall be informed about the waste reduction policy of the tourist accommodation and the use of quality product alternatives to disposable and single portion products, and should be encouraged to use non-disposable products, in case where any legislation requires the use of disposable products.

— They shall be informed how and where they can separate waste according to local or national systems within the areas belonging to the tourist accommodation and where to dispose of their hazardous substances.

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

**Feedback:**

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

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

**BEMP:**

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

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

Combined, these meet best environmental practice.

**Proposed updates:**

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

*All information to guest must be easily accessible.*

*The guest questionnaire(s) may be in electronic format (i.e. online), but the guest must be actively directed to this (i.e. via email or information points in the tourist accommodation). If guests are encouraged to complete an online questionnaire, this should ask – as a minimum- (1) their views on these environmental aspects of the tourist accommodation and (2) general customer satisfaction with the facilities and services of the tourist accommodation.*

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

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

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

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

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

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

#### **Proposal for revised criterion:**

##### **Information to guests**

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

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

Specific actions for the different areas shall be:

##### Concerning **energy**:

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

##### Concerning **water and waste water**:

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

**Concerning waste:**

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

**Concerning customer satisfaction:**

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

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

#### 2.2.5.5 Criterion 28: Energy and water consumption data

**Current criterion:**

**Energy and water consumption data**

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

Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as consumption per overnight stay and per m<sup>2</sup> of indoor area.

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

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

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

1. Stakeholder feedback relating to this criterion did not suggest any updates. However, one stakeholder states that there is general recognition that data collection/measuring is important, but the current indicators (guests/m<sup>2</sup>) should be revised and reminders sent to businesses to ensure data is collected. It may be beneficial to explain why data collection is important. Furthermore, suggested indicators include: heat consumption per HDD (CDD), water consumption per guest (exclude pool), energy consumption per overnight stay and meals cooked.
2. Relevant BEMP includes: *“Undertake an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering)*

*in order to identify efficient improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection.*

3. The Nordic Swan environmental label also has a criterion relating to energy and water consumption data. In the absence of BEMP, this has been consulted to understand best practice in collecting this data. The Nordic Swan requires measurements for:

1. Water (litres/guest-night)
2. Energy:
  - Option 1: Electricity and heating consumption per year and square metre.
  - Option 2: Electricity and heating consumption per year and guest night.

The criterion shall remain as:

Proposal for revised criterion:
<p><b>Energy and water consumption data</b></p> <p>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).</p> <p>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 m<sup>2</sup> of indoor area.</p> <p>The tourist accommodation shall report the results yearly to the Competent Body that assessed the application.</p> <p><i>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.</i></p>

### Consultation comments and discussion points:

Stakeholder comment	Discussion points
<p><i>'The term 'indoor area' should be specified more clearly. Does it include only guestrooms and common areas or even kitchen and conference facilities?'</i></p>	<p>How should 'indoor area' be defined for this criterion?</p>



## 2.2.5.6 Criterion 29: Other data collection

### Current criterion:

#### Other data collection

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

Data shall be collected where possible, monthly or at least yearly, and shall also be expressed as consumption or production per overnight stay and per m<sup>2</sup> of indoor area.

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

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

#### **Feedback:**

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

Suggestions for changes include:

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

#### **BEMP:**

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

#### **Other updates:**

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

### Proposal for revised criterion:

#### Other data collection

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

Data shall be collected where possible, monthly or at least yearly, and shall also be expressed as consumption or production per overnight stay and per m<sup>2</sup> of indoor area.

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

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

### 2.2.5.7 Criterion 30: Information appearing on the eco-label

#### Current criterion:

#### Information appearing on the eco-label

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

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

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

**This criterion does not require updating, and so it is proposed that no changes are made.**

**This is based on the following:**

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

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The criterion shall remain as:

**Proposal for revised criterion:**

**Information appearing on the Ecolabel**

Box 2 of the Ecolabel shall contain the following text:

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

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

## 2.2.6 Optional criteria related to energy

### 2.2.6.1 Criterion 31: Generation of electricity through renewable energy sources

**Current criterion:**

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

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

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

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

**Feedback:**

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

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

**BEMP:**

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

### **Other updates:**

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

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

### **Proposed update:**

The criterion has been updated to allocate points where both 10% and 20% of electricity is generated by renewable energy sources, as suggested by stakeholder feedback. In addition, the use of on-site renewable energy generation has been clarified.

### **Proposal for revised criterion:**

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

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

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

or

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

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the photovoltaic, hydroelectric, geothermal, biomass or wind power system and data on both its potential and actual output.*

### **Consultation comments and discussion points:**

#### **Discussion points**

Should the points allocation for the proposed criteria be adjusted?

#### **Stakeholder comment**

*'In France, it's rare that hotels use their own production, they usually sell it. So it would be better to leave that possibility as written in the existing criterion: "the tourist accommodation shall introduce into the grid a net amount of electrical energy produced from renewable energy sources".'*

#### **Discussion points**

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

What should the time period for this requirement be?

## 2.2.6.2 Criterion 32: Energy from renewable energy sources

### Current criterion:

#### Energy from renewable energy sources (up to 2 points)

At least 70% of the total energy used to heat or cool either the rooms or to heat sanitary water shall come from renewable energy sources. (1.5 points, 2 points for 100% of the tourist accommodation's energy used for that purpose, coming from renewable energy sources).

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on the energy consumed in heating rooms and hot water and documentation showing that at least 70% or 100% of this energy comes from renewable energy sources.*

### Feedback:

No stakeholder feedback was received for this criterion.

### BEMP:

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

### Proposed update:

Although this criterion is in line with BEMP, it is proposed that this is updated to include energy for all purposes, rather than just “to heat or cool either the rooms or to heat sanitary water”. This also brings the criterion in line with Criterion 1 which does not limit the requirement of ‘energy from renewable sources’ to just heating and cooling.

### Proposal for revised criterion:

#### Energy from renewable energy sources (up to 2 points)

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

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on energy consumed and documentation showing that at least 70% or 100% of this energy comes from renewable energy sources.*

### Consultation comments and discussion points:

#### Discussion points

Should the points allocation for the proposed criteria be adjusted?

### 2.2.6.3 Criterion 33: Boiler energy efficiency

#### Current criterion:

#### Boiler energy efficiency (1.5 points)

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

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

#### Feedback:

A number of stakeholders commented that this criterion should be brought into line with existing ISO-Type 1 eco-labels, including the EU Ecolabel. These may include, for example:

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

#### BEMP:

BEMP is to install the most efficient HVAC systems. This is in line with the current EU Ecolabel criterion.

#### Other updates:

It is suggested that the current criterion 'boiler energy efficiency' is updated with this to encourage take up of this new EU Ecolabel criterion.

#### Proposed update:

It is proposed that this criterion is brought into line with the EU Ecolabel for water based space heaters. Although other ISO-Type I labels are available for boilers, the scope of each of these is very different and so it is not feasible to develop one criterion which covers all of these labels. In addition, the EU Ecolabel for water based space heaters is broad, and encompasses a wider variety of products than the previous criterion for 'boilers'. The following update is therefore proposed.

#### 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.*

#### Consultation comments and discussion points:

##### Discussion points

Should the points allocation for the proposed criteria be adjusted?

## 2.2.6.4 Criterion 34: Boiler NOx emissions

### Current criterion:

#### Boiler NOx emissions (1.5 points)

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

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

### Feedback:

Only one comment was received for this criterion which suggested that this criterion should be updated to include a more general definition which comprises other types of heaters (for example biomass).

### BEMP:

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

### Other updates:

It is suggested that the current criterion 'boiler energy efficiency' is updated with this to encourage take up of this new EU Ecolabel criterion. In addition, the EU Ecolabel for water based space heaters is broad, and encompasses a wider variety of products than the previous criterion for 'boilers' – broadening this criterion was suggested by stakeholders.

### Proposed update:

It is proposed that this criterion is updated to take into account EU Ecolabel criterion for water based space heaters. The criterion also includes a methodology for calculation. (see update of assessment and verification section below).

The following is proposed:

### 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 <sup>3</sup> at 10% O <sub>2</sub>

*Assessment and verification: The applicant shall provide a report or technical specifications*

*from the professional technicians responsible for the sale and/or maintenance of the water based space heater. The calculation shall be in accordance with Appendix 1 of Commission Decision of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters.*

## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

## 2.2.6.5 Criterion 35: District heating

### Current criterion:

#### District heating (1.5 points)

The heating of the tourist accommodation shall be provided by efficient district heating, for the purposes of the eco-label defined as follows.

Generation of heat is done either in high efficiency cogeneration units as defined by Directive 2004/8/EC and any other Commission instruments adopted in application of that Directive, or in heat only boilers with an efficiency that matches or surpasses the applicable reference value established by Commission Decision 2007/74/EC.

And in addition:

— The pipes in the district heating distribution network shall meet the requirements as laid out in the applicable CEN standards for such pipes.

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation showing connection to the district heating.*

### Regulation:

Directive 2004/8/EC [OJ L 52, 21.2.2004, p.50] was repealed by Directive 2012/27/EU of the European parliament and of the Council [OJ L 315, 14.11.2012, p.1] on the 5 June 2014. However, the definition for ‘high efficiency cogeneration units’ remains unchanged. Commission Decision 2007/74/EC was repealed by Commission Implementing Decision 2011/877/EU [OJ L 343, 19.12.2011, p.91]. Harmonised efficiency reference values for separate production of heat remain unchanged.

### Feedback:

Only one stakeholder comment was received for this criterion, which suggested that the option “use of industrial waste heat” could be added.

### BEMP:

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



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**Proposed update:**

The criterion shall largely remain as before, with one update to reflect a change in Regulation:

**Proposal for revised criterion:****District heating (1.5 points)**

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

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

And in addition:

— The pipes in the district heating distribution network shall meet the requirements as laid out in the applicable CEN standards for such pipes.

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation showing the connection to the district heating system.*

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.6.6 Criterion 36: Combined heat and power — cogeneration****Current criterion:****Combined heat and power — cogeneration (1.5 points)**

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

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

**Regulation:**

Directive 2004/8/EC [OJ L 52, 21.2.2004, p.50] was repealed by Directive 2012/27/EU of the European parliament and of the Council [OJ L 315, 14.11.2012, p.1] on the 5 June 2014. However, there has been no change in definition, criteria or methodology.

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

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**Feedback:**

No feedback was received for this criterion.

**BEMP:**

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

**Proposed update:**

The criterion needs to be updated to reflect a change in Regulation. No other changes are required.

The criterion shall be updated to:

**Proposal for revised criterion:****Combined heat and power — cogeneration (1.5 points)**

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

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

**Consultation comments and discussion points:**

Proposed changes to criterion	Discussion points
<i>'It is suggested to add more points in accordance with the cost of equipment'</i>	Should the points allocation the proposed criteria be adjusted?

**2.2.6.7 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.*

**Feedback:**

No feedback was received for this criterion.

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**BEMP:**

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

**Proposed update:**

It has been proposed that Criterion 33 should be expanded from the energy efficiency of ‘boilers’ to ‘water based space heaters’. This criterion then aligns with the development of EU Ecolabel for water based space heaters. Heat pumps are included within the scope of this updated Criterion 33, and so it is proposed that Criterion 37: heat pump, is removed to ensure points are not awarded under two criterion for the same thing.

**This criterion should be removed.**

**2.2.6.8 Criterion 38: Heat recovery****Current criterion:****Heat recovery (up to 1.5 points)**

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

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

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

1. No stakeholder feedback was received for this criterion.
2. BEMP is to encourage the installation of heat recovery systems where possible – as encouraged in the current EU Ecolabel criterion.

The criterion shall remain as:

**Proposal for revised criterion:****Heat recovery (up to 1.5 points)**

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

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

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## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

#### 2.2.6.9 Criterion 39: Thermoregulation

##### Current criterion:

##### Thermoregulation (1.5 points)

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

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

##### Feedback:

No stakeholder feedback was received for this criterion.

##### BEMP:

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

##### Proposed updates:

It is proposed that this criterion is maintained, but that the purpose (i.e. to ensure energy efficiency) is outlined. It should be clear that this criterion applies to common areas only – not individual guest rooms where air conditioning controls can be counter-productive in terms of energy saving.

##### Proposal for revised criterion:

##### Thermoregulation (1.5 points)

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

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

## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

### 2.2.6.10 Criterion 40: Energy performance audits for buildings

#### Current criterion:

#### Energy performance audits for buildings (1.5 points)

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

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

#### **Feedback:**

There were a number of stakeholder comments on this criterion – these related to:

- Suggestion that audits should not be undertaken bi-annually, but instead according to national regulation or less often (every five years was suggested by one respondent).
- More points should be awarded for this criterion as fulfilling this can be costly.
- It was suggested that in the first instance, a pre-diagnosis including recommendations would be a good incentive to help tourist accommodation owners improve energy efficiency. A full energy performance audit would then not be needed, or at least not needed as often.

#### **BEMP:**

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

PassiveHouse and Minergie P standards are voluntary standard for energy efficiency in a building, reducing its ecological footprint. Although it is mostly applied to new buildings; it has also been used for refurbishments.

The new-build Passivhaus Standard requires:

- a maximum space heating and cooling demand of less than 15 kWh/m<sup>2</sup>.year or a maximum heating and cooling load of 10W/m<sup>2</sup>
- a maximum total primary energy demand of 120 kWh/m<sup>2</sup>/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/m<sup>2</sup>.year or a maximum heating and cooling load of 10W/m<sup>2</sup>
- a maximum total primary energy demand of 120 kWh/m<sup>2</sup>/year + heat load factor
- an air change rate of no more than 1.0 air changes per hour @ 50 Pa

To achieve the Passivhaus Standard in the UK typically involves:

- very high levels of insulation
- extremely high performance windows with insulated frames
- airtight building fabric
- 'thermal bridge free' construction
- a mechanical ventilation system with highly efficient heat recovery

As of January 2010, there were approximately 25,000 such certified structures of all types in Europe

**Proposed updates:**

It is suggested that the current criterion is updated to reflect stakeholder feedback – an annual audit is sufficient. This criterion should be achievable by all applicants and types of tourist accommodation, and a costly bi-annual audit may be restrictive. Consideration of PassivHaus standards should be made, as outlined in the BEMP.

The following is therefore proposed:

<b>Proposal for revised criterion:</b>
<p><b>Energy performance audits for buildings (1.5 points)</b></p> <p>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.</p> <p>OR</p> <p><u>The tourist accommodation has been certified to PassivHaus or Minergie P standards.</u></p> <p>Assessment and verification: the applicant shall provide the energy performance audit report (each time it is undertaken) and provide detailed documentation on how the tourist accommodation has fulfilled this criterion. <u>Documents relative to PassivHaus or Minergie P standards should be provided.</u></p>

**Consultation comments and discussion points**

<b>Proposed changes to criterion</b>	<b>Discussion points</b>
It is suggested to award more points, as the audit can be costly	Should the points allocation for the proposed criteria be adjusted?

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## 2.2.6.11 Criterion 41: Air conditioning

### Current criterion:

#### Air conditioning (up to 2 points)

All household air conditioner in the tourist accommodation have an energy efficiency 15% higher than the threshold to qualify for the top class A in Directive 2002/31/EC (1.5 points). All household air conditioners in the tourist accommodation have an energy efficiency 30% or higher than the threshold to qualify for class A in Directive 2002/31/EC (2 points).

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

*Assessment and verification: The applicant shall provide relevant documentation showing compliance with the criterion.*

### **Regulation:**

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

### **Feedback:**

No stakeholder feedback was received for this criterion.

### **BEMP:**

BEMP specifies that air conditioning systems should be energy efficient, properly maintained and appropriately used.

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

### **Proposed updates:**

An update in line with the revised Regulation 2011/626/EU, supplementing directive 2010/30/EU is required. This results in the following update:

**Proposal for revised criterion:****Air conditioning (2 points)**

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

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

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

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

Stakeholder comment	Discussion points
'Are heat recuperation units used for ventilation in passive houses regarded as air-conditioning units as well?'	Are these units included within the scope of this criterion?
'Accommodation facilities with ventilation and cooling arranged by other means than (energy demanding) A/C should also be encouraged. Or are they rather targeted by the criterion on energy performance audit so that they don't get points for the same thing twice?'	Should further encouragement be given to accommodations which ventilate and cool by alternative means (i.e. other than energy demanding A/C)?

**2.2.6.12 Criterion 42: Automatic switching-off of air conditioning and heating systems****Current criterion:****Automatic switching-off of air conditioning and heating systems (1.5 points)**

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

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



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

1. Where stakeholder feedback was received, this was not to suggest updates of the technical content, but rather to outline that this can be costly for tourist accommodation. This criterion is not, however, mandatory and so does not need to be updated to reflect this.
2. BEMP has not been updated since the previous revision for TAS and CSS, and as such this criterion is still applicable. Generally, automatic switching off of heating and cooling systems is encouraged as a method of saving energy and maximising the output of these systems.

The criterion shall remain as:

**Proposal for revised criterion:**

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

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

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

**Consultation comments and discussion points:**

**Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.6.13 Criterion 43: Bioclimatic architecture**

**Current criterion:**

**Bioclimatic architecture (3 points)**

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

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

**Feedback:**

Stakeholder feedback was limited, but a number of comments suggested that this criterion needed to be better defined – there was some general confusion around what ‘bioclimatic architectural principles’ included. It was also suggested that this criterion be mandatory for new buildings.

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**BEMP:**

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

**Other updates:**

A number of other EU Ecolabel criteria for tourist accommodation relate directly to this criterion, and in some cases there is some overlap. These include:

Criterion 3: efficiency and heat generation

Criterion 4: air conditioning

Criterion 5: energy efficiency of buildings

Criterion 6: window insulation.

Criterion 40: energy performance audits for buildings, has also been updated to refer directly to PassiveHouse and Minergie P standards.

**Proposed update:**

This criterion is not achievable for all organisations (only those which are newly built) and so should be removed. Feedback also suggests there is some confusion about how this can be proved. In addition, a number of existing criteria overlap with Criterion 43: bioclimatic architecture.

**It is proposed that this criterion is removed.**

## 2.2.6.14 Criterion 44: Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumblers and office equipment

### Current criterion:

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

(a) (1 point): All household refrigerators shall be of Class A+ or A++ efficiency according to Commission Directive 94/2/EC, and all frigo or mini-bars shall be at least class B efficiency.

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

(b) (1 point): All household electric ovens shall be of class A energy efficiency as laid down in Directive 2002/40/EC.

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

*Note: The criterion does not apply to ovens not operated with electric energy or otherwise not covered by Commission Directive 2002/40/EC (e.g. industrial ovens).*

(c) (1 point): All household dishwashers shall be of class A energy efficiency as laid down in Commission Directive 97/17/EC.

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

*Note: The criterion does not apply to dishwashers not covered by Directive 97/17/EC (e.g. industrial dishwashers).*

(d) (1 point): All household washing machines shall be of class A energy efficiency as laid down in Commission Directive 95/12/EC (3).

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

*Note: The criterion does not apply to washing machines not covered by Directive 95/12/EC (e.g. industrial washing machines).*

(e) (1 point): At least 80% of office equipment (PCs, monitors, faxes, printers, scanners, photocopying machines) shall qualify for the energy star as laid down in Regulation (EC) No 106/2008 of the European Parliament and of the Council (4) and in Commission Decision 2003/168/EC (5).

*Assessment and verification: The applicant shall provide documentation indicating the qualification for the energy star of the office equipment.*

### **Regulation:**

- a) Commission Directive 94/2/EC was repealed in November 2011 by Commission Delegated Regulation (EU) No 1060/2010 of 28 September 2010 supplementing

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Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household refrigerating appliances [OJ L 314, 30.11.2010, p.17]. Class thresholds remain unchanged; higher efficiency classes are introduced. Based on the fact that the current criterion stipulates the two highest classes for the award of the optional points, this should be maintained i.e. A+++ and A++

- b) Commission Directive 2002/40/EC is currently in force but will be repealed in January 2015 by Commission Delegated Regulation (EU) No 65/2014 [OJ L 29, 31.1.2014, p.1]. Class thresholds remain unchanged; higher efficiency classes have been introduced. We therefore propose the highest classification under the new Regulation i.e. A+++.
- c) Commission Directive 97/17/EC was repealed in December 2011 by Commission Delegated Regulation (EU) No 1059/2010 [OJ L 314, 30.11.2010, p.1]. Methodology for the calculation of the Energy Efficiency Index (EEI) and is expressed differently. Therefore cannot compare whether the thresholds have changed, however the current criterion stipulates the highest class, we therefore propose the highest classification under the new Regulation i.e. A+++.
- d) Commission Decision 95/12/EC was repealed by Commission Delegated Regulation (EU) No 1061/2010 [OJ L 314, 30.11.2010, p. 47]. Methodology for the calculation of the Energy Efficiency Index (EEI) and is expressed differently. Therefore cannot compare whether the thresholds have changed. However the current criterion stipulates the highest class, we therefore propose the highest classification under the new Regulation i.e. A+++.
- e) No changes in legislation.
- f) Directive 95/13/EC was repealed in May 2012 by Commission Delegated Regulation (EU) No 392/2012 [OJ L 123, 9.5.2012, p.1]. Methodology for the calculation of the Energy Efficiency Index (EEI) and is expressed differently. Therefore cannot compare whether the thresholds have changed. However the current criterion stipulates the highest class, we therefore propose the highest classification under the new Regulation i.e. A+++.

#### **Feedback:**

Stakeholder feedback on this criterion covered two main points:

- Consideration of the new energy efficiency class A+++ for different devices (in line with new regulation, outlined above).
- The possibility of including requirements for industrial appliances.

#### **BEMP:**

BEMP outlines that best practice is to “*select efficient cooking equipment, including induction-hob or pot-sensor-controlled gas ovens, efficient refrigeration equipment that uses a natural refrigerant such as ammonia or carbon dioxide, and to control ventilation according to demand.*” The use of recent regulation on energy labelling of appliances ensures that this is the case for EU Ecolabelled tourist accommodation.

#### **Other updates:**

In order to assess the feasibility of changing the Ecolabel criteria requirement to the newly introduced, higher energy efficiency classes it is necessary to evaluate whether these are available on the market. The section below looks at market data over the past years to understand what percentage of the market A++ and A+++ products account for in Europe.

Figure 1 shows the overall market share of household appliances with energy efficiency class A+++ and A++ in European countries. The market share throughout the region is of 15% for the highest energy class and 19% for A++ appliances out of all appliances sold between January and February 2014. This indicates that the recently introduced higher energy classes have had a

quick uptake amongst consumers, particularly if taken into account the lower figures of countries such as Russia and Kazakhstan which lie at the bottom of the rankings and are not members of the European Union. In Germany, Belgium and Austria these appliances account for over half of new sales in this period.

Specific data for large household appliances (washing machines, dishwashers, refrigerators and freezers) show strong variation in market penetration of the most efficient energy classes for different product types. However, strong growth in the market share of the A++ class is experienced for all such appliances (Figure 2).

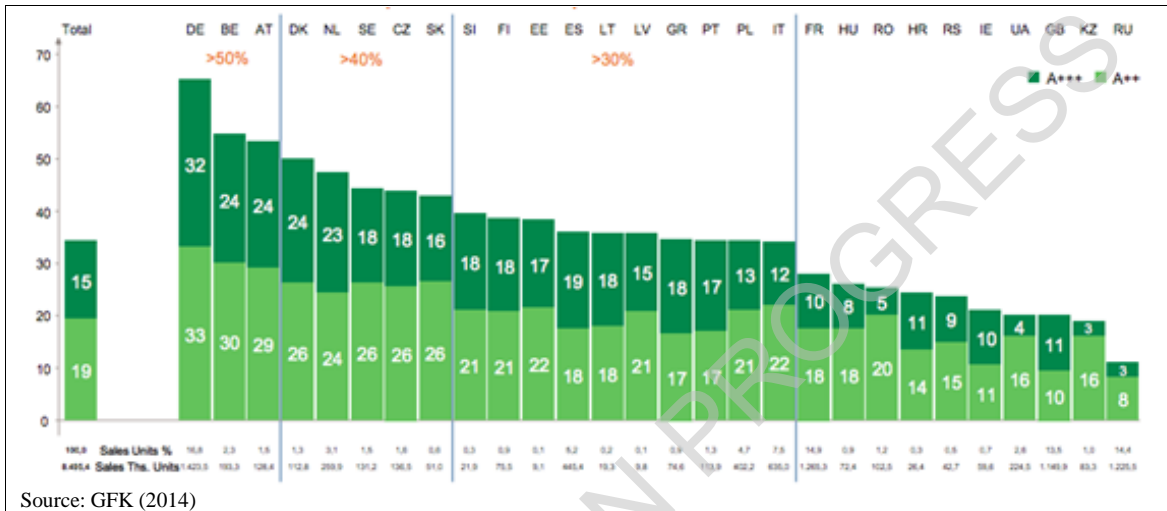


Figure 1: Sales unit share by energy efficiency class, by country, January to February 2014

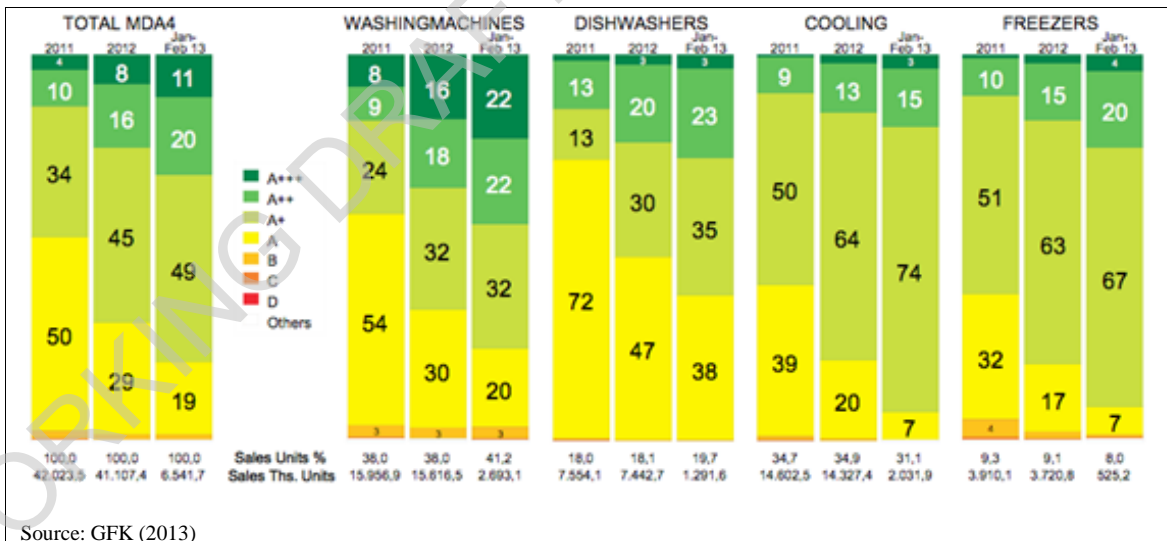


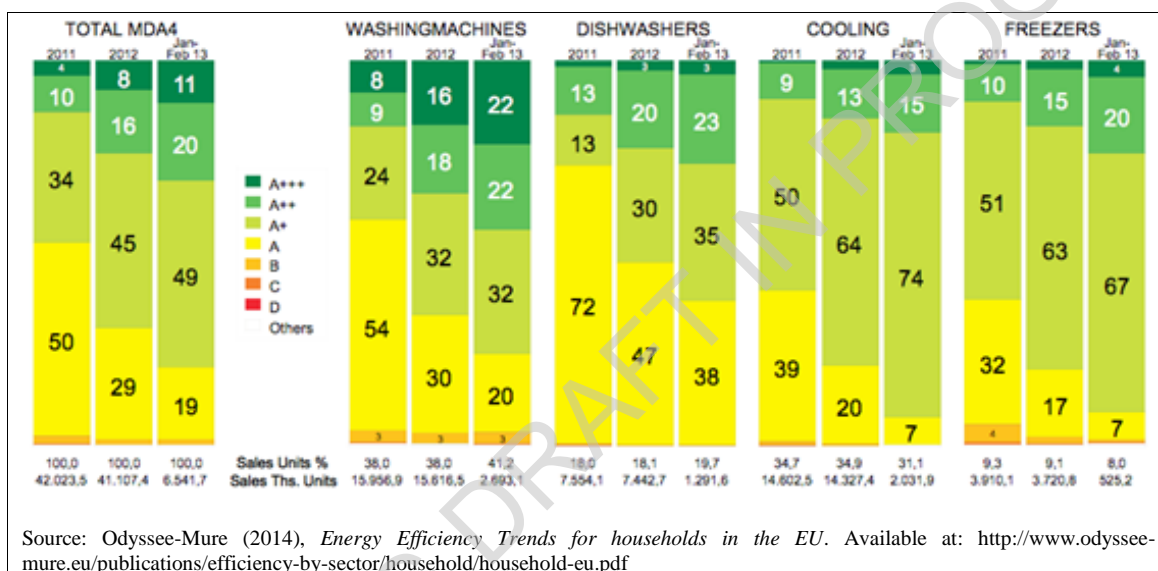
Figure 2: Sales of appliances in 23 European countries

Washing machines exhibit the greatest move towards products with the lowest use of energy. As can be seen, the A+++ energy class already accounted for 8% of new appliances sold in 2011, and reached 22% at the start of 2013 (Figure 2).

According to topten.eu, a website showing the best appliances in terms of energy efficiency on the European market, all 32 listed washing machines in September 2013 were classed A+++. Out of these, best Energy Efficiency Index (EEI) is 27.1 for a model with 8 kg capacity. This is 40% lower than the A+++ EEI threshold (EEI < 46). In 2011, the best available model exceeded the threshold by 9%. Thus great improvements are being made over short periods of time [Topten.eu, (2013)].

Dishwashers have experienced a lower move towards higher energy efficient products compared to washing machines. Figure 2 shows that sales of class A+++ have grown from 1% to 3% between 2011 and 2012, and remained constant at the beginning of the following year. However, classes A++ and A+ have increased considerably in the same period. The top three classes accounted for 61% of new sales between January and February 2013. Eleven A+++ classed dishwashers were listed on Topten.eu in June 2014, in addition to eight A++ products.

The market share for refrigerators classed A+ increased from 10% in 2005 to 64% in 2012 (Figure 3), whereas the combined market share for A++ and A+++ appliances was 15% in 2012 in EU-15 countries. According to GFK data the market penetration of the top two energy classes reached 18% at the start of 2013 (Figure 2). Freezers experienced larger market penetration, with a combined market share of 24% for A++ and A+++ products. In the Netherlands and Germany, the market share for refrigerators with A++ and A+++ energy efficiency classes were as high as 40% and 45% of sales respectively [Odyssee-Mure, (2014)]. Topten.eu reports that a large number of A+++ refrigerator models are available on the market. In October 2013, 111 products with the highest efficiency rating were listed on the website [Topten.eu. (2013a)].

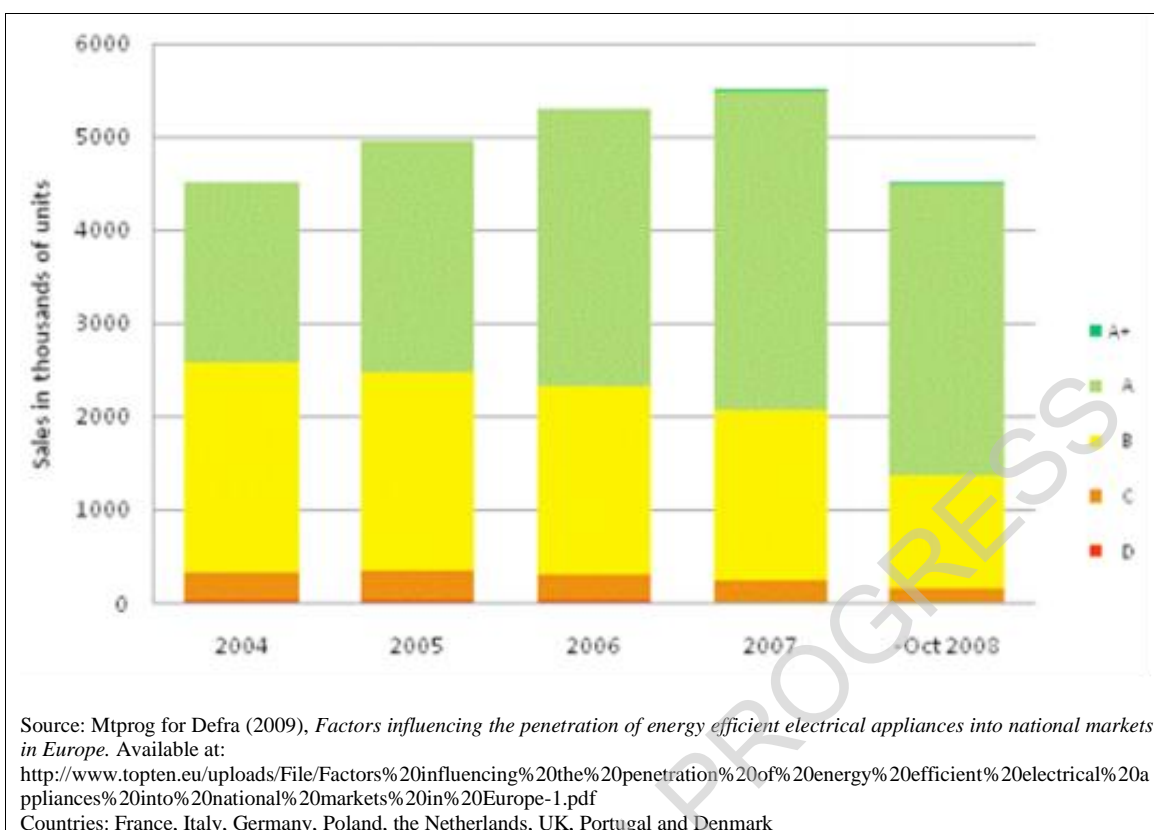


Source: Odyssee-Mure (2014), *Energy Efficiency Trends for households in the EU*. Available at: <http://www.odyssee-mure.eu/publications/efficiency-by-sector/household/household-eu.pdf>

Figure 3: Market share of label A to A+++ for refrigerators (EU-15)

EU wide data for the market share of tumble driers by energy efficiency ratings were not available at the time of writing. According to the Topten in the UK, no tumble driers classed A+++ are available in the UK market. It should be noted that the A++ and A+++ labels were only introduced in 2013. Data shows that 67% of appliances are labelled with a C class and only 1% of the current market is made up by A++ products [Topten Energy Efficiency Guide, (2013)]. According to topten.eu, by the end of 2013 there were 17 different models with class A++ and five that reached class A+++.

Finally, the latest data available for electric ovens dates to 2008. The new Directive introducing A++ and A+++ energy classes will be coming into force in 2015 therefore information on the market penetration of these appliances is not available. Data from then shows that over half the electric ovens and cookers sold were class A (Figure 4). It should be noted that the A+ share shown in this figure is due to a reporting error by a manufacturer [Mtprog, (2009)].



**Figure 4: Market share of electric ovens and cookers in 8 European countries**

**Proposed updates:**

The only update needed is to consider changes to regulation. This results in the following:

**Proposal for revised criterion:**

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

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

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

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

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

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

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

*Assessment and verification: The applicant shall provide documentation indicating the energy*

class of all the dishwashers.

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

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

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

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

(e) (1 point): At least 80% of office equipment (PCs, monitors, faxes, printers, scanners, photocopying machines) shall qualify for the energy star as laid down in Regulation (EC) No 106/2008 of the European Parliament and of the Council (4) and in Commission Decision 2003/168/EC (5).

*Assessment and verification: The applicant shall provide documentation indicating the qualification for the energy star of the office equipment.*

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

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

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

### Consultation comments and discussion points:

#### Discussion points

Should the points allocation for the proposed criteria be adjusted?

Stakeholder comment	Discussion points
<i>'To add A+++ is too stringent.'</i>	Is the A+++ energy efficiency class too stringent?

### 2.2.6.15 Criterion 45: Electric hand and hair driers with proximity sensor

#### Current criterion:

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

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

*Assessment and verification: The applicant shall provide appropriate supporting documentation*



*of how the tourist accommodation fulfils this criterion.*

**Feedback:**

Stakeholder feedback suggests that hairdryers are more commonly fitted with ‘push buttons’ than proximity sensors, which makes this criterion difficult to achieve.

**BEMP:**

There is no BEMP specifically for hand and hair dryers – the environmental impact of these may not be significant in a large hotel. However, the use of proximity sensors can be assumed to be preferable to push button driers – once these are pressed they will run according to a timer, regardless of whether anyone is drying their hands.

**Proposed update:**

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

**Proposal for revised criterion:**

**Electric hand driers with proximity sensor (1 point)**

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

*Assessment and verification: The applicant shall provide appropriate supporting documentation of how the tourist accommodation fulfils this criterion.*

**Consultation comments and discussion points:**

**Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.6.16 Criterion 46: Refrigerator positioning**

**Current criterion:**

**Refrigerator positioning (1 point)**

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

*Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion.*

**Feedback:**

No stakeholder feedback was received regarding this criterion.

**BEMP:**

There is no specific BEMP guidance for refrigerator positioning, only general information on the preference for energy efficient equipment and its maintenance. However, the current User Manual for TAS and CSS specifies that to meet this criterion:

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

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

**Proposed updates:**

To avoid confusion, it is suggested that the information in the current User Manual for TAS and CSS is included directly in the criterion. This results in the following change:

Proposal for revised criterion:
<p><b>Refrigerator positioning (1 point)</b></p> <p>The kitchen, kiosk and shop refrigerator(s) shall be positioned and regulated according to energy saving principles, in order to reduce energy waste.</p> <p><u>At least two of the following energy saving principles shall be respected:</u></p> <ol style="list-style-type: none"><li><u>1. the refrigerator is far from or shielded from sources of heat, such as the oven;</u></li><li><u>2. the cooling tubes of the refrigerator are well cleaned on a regular basis;</u></li><li><u>3. there are precise procedures to open the refrigerator as few times as possible.</u></li></ol> <p><i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, <u>including which actions are followed.</u></i></p>

**Consultation comments and discussion points:**

Discussion points
Should the points allocation for the proposed criteria be adjusted?

**2.2.6.17 Criterion 47: Automatic switching off lights in tourist accommodation**

Current criterion:
<p><b>Automatic switching off lights in tourist accommodation (1.5 points)</b></p> <p>Automatic systems, which turn the lights off when guests leave the room, shall be installed in 95% of the tourist accommodation.</p> <p><i>Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the installation and/or maintenance of these systems.</i></p>

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

1. Very little stakeholder feedback was provided about this criterion. Some comments did suggest that this criterion should be made mandatory, however it is suggested that this may impose too big a burden on tourist accommodation. This criterion is also supported by Criterion 8: switching off lights.

2. The BEMP has not been updated since the previous revision for TAS and CSS, and as such this criterion is still applicable. Best practice is “for all rooms and corridor areas to have intelligent lighting control. For small enterprises where automatic lighting control in rooms may not be practical, the best practice is to install appropriately positioned signs reminding guests to switch off lights (as required in EU Flower criteria for accommodation: EC, 2009).” Reference to the EU Ecolabel in this case shows that this criterion does not need updating.

The criterion shall remain as:

**Proposal for revised criterion:**

**Automatic switching off lights in tourist accommodation (1.5 points)**

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

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

**Consultation comments and discussion points:**

**Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.6.18 Criterion 48: Sauna timer control**

**Current criterion:**

**Sauna timer control (1 point)**

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

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

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

1. Little feedback was received for this criterion, and no suggestions for updates were proposed.
2. The BEMP for the use of saunas has not been updated – the impact of this is likely to be small compared to other activities in a tourist accommodation sites. Nevertheless, timer controls are generally considered practical so as not to waste energy when the equipment is not being used.

The criterion shall remain as:

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**Proposal for revised criterion:****Sauna timer control (1 point)**

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

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

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.6.19 Criterion 49: Swimming pool heating with renewable energy sources****Current criterion:****Swimming pool heating with renewable energy sources (up to 1.5 points)**

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

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

**This criterion requires no significant updating. This is based on the following:**

1. Very little stakeholder feedback was provided on this criterion; although there was one suggestion that it could be mandatory for all new swimming pools to fulfil this criterion. This may not, however, be feasible for all types of tourist accommodation within the scope of the EU Ecolabel criterion.
2. The BEMP for swimming pool heating has not been updated – in general heating from renewable energy sources is required. For clarity, the assessment and verification section should be updated to set out the definition of renewable energy sources.

The criterion is proposed as:

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**Proposal for revised criterion:****Swimming pool heating with renewable energy sources (up to 1.5 points)**

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

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with data on the energy consumed in heating swimming pool water and documentation showing the amount of energy used that comes from renewable energy sources. Renewable energy sources are defined as renewable, non-fossil energy sources (wind, solar, geothermal wave, tidal, hydro power, biomass, landfill gas, sewage treatment plant gas and biogases) – this is in accordance with is Directive 2001/77/EC.*

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.6.20 Criterion 50: Automatic switching off outside lights****Current criterion:****Automatic switching off outside lights (1.5 points)**

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

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

**Feedback:**

There was very little feedback on this criterion; however, it was suggested by EU Ecolabel assessors for TAS that often outside lights may not be well maintained. This can result in timers or sensor systems being installed that may not work effectively. To mitigate this, it is important that some maintenance is carried out.

**BEMP:**

BEMP for outside lighting includes:

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

**Proposed updates:**

Although no significant updates are required for this criterion, feedback from EU Ecolabel assessors suggests that these lighting systems may not always be well maintained. Maintenance

should therefore be specified as a requirement, to ensure automatic times or sensors are working effectively.

The following is therefore proposed:

**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.*

**Consultation comments and discussion points:**

**Discussion points**

- 1) Should the points allocation for the proposed criteria be adjusted?
- 2) Feedback to better define the regular maintenance is welcome

## 2.2.7 Optional criteria related to water

### 2.2.7.1 Criterion 51: Use of rainwater and recycled water

**Current criterion:**

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

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

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

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

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

**Feedback:**

Limited feedback was received for this criterion, although there were a few suggestions that the use of rainwater could be made mandatory – even if this is only limited.

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**BEMP:**

BEMP for the use of rain and recycled water is to “install a grey water recovery system that recovers grey water for use in indoor processes (e.g. toilet flushing) following treatment or exterior processes (e.g. irrigation), or a rainwater collection system that uses rainwater for indoor purposes.”

Although the BEMP specifies the use of rainwater and recycled water, much like the EU Ecolabel criterion, it makes a distinction between the use of this water for indoor and exterior processes. This is not reflected in the current EU Ecolabel criterion.

**Proposed update:**

It is suggested that this criterion should be rationalised to take into account the different systems needed for ‘indoor’ and ‘exterior’ use of recycled water. The criterion would then recognise the relative high investment required to introduced a system for rain/recycled water use for internal use, as opposed to external use. Due to the high investment required, it is likely that a number of tourist accommodation sites may not initially be able to achieve this criterion – making this mandatory would therefore not be practical.

The following is therefore proposed:

<b>Proposal for revised criterion:</b>
<b>Use of rainwater and recycled water (up to <u>3 points</u>)</b>
(a) (1 point): <u>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).</u>
<i>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.</i>
(b) (2 points): <u>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).</u>
<i>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.</i>

**Consultation comments and discussion points:**

<b>Stakeholder feedback</b>	<b>Discussion points</b>
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?

## 2.2.7.2 Criterion 52: Automatic watering systems for outside areas

### Current criterion:

#### Automatic watering systems for outside areas (1.5 points)

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

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

### Feedback:

Several stakeholders suggested that this criterion should be updated to award points where gardens are not watered. In addition, it was suggested that an automatic watering system can use more water than a manual system which relies on one trained person and a specific process.

### BEMP:

The BEMP does not specify that automatic watering systems are preferred (as does the EU Ecolabel criterion), but instead specifies that water consumption for irrigation should be minimised in general:

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

### Other updates:

It is suggested that both BEMP and the stakeholder feedback is considered in updating this criterion. Importantly, this criterion is focused on minimising water consumption for irrigation and should therefore allow tourist accommodation to establish a best practice system. This may be, for example, to not water the garden at all. The following change to the criterion is therefore proposed:

### Proposal for revised criterion:

#### Watering systems for outside areas (1.5 points)

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

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



## Consultation comments and discussion points:

Discussion points	
Should the points allocation for the proposed criteria be adjusted?	
Stakeholder comment	Discussion points
<i>'It would be better not to add and ask more documentation to the TAS.'</i>	Should the accommodation service providers be required to include including details of the documented system/procedure for watering?

### 2.2.7.3 Criterion 53: Water flow from taps and shower heads

Current criterion:
<b>Water flow from taps and shower heads (1.5 points)</b>  The average flow from all taps and shower heads excluding bath taps and filling stations shall not exceed 8 litres/minute.  <i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation.</i>

#### **Feedback:**

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

#### **BEMP:**

There is no indication of best practice for limiting water flow within BEMP, although the EU Ecolabel TAS criteria are referenced. However, it is clear that water flow should be controlled to minimise overall water use.

#### **Proposed update:**

It should be made clear that this criterion relates to mandatory Criterion 11: water flow from taps and showers. Criterion 53 awards points for those tourist accommodation sites which go above the limits laid out in the mandatory criterion. To align with this mandatory criterion, it is proposed that the water flow rate is reduced to 5 litres/minute for taps (up to 6 litres/minute is permitted as a maximum for the mandatory criteria). A flow below 8 litres/minute for showers has been found to be difficult to achieve from the technical point of view.

The following criterion is proposed:

### **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.

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

### **Consultation comments and discussion points:**

#### **Discussion points**

Should the points allocation for the proposed criteria be adjusted?

#### **2.2.7.4 Criterion 54: WC flushing**

##### **Current criterion:**

#### **WC flushing (1.5 points)**

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

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

##### **Feedback:**

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

##### **BEMP:**

Best practice for WC flushing is to “minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs”.

Again, the use of dual flush WCs is outlined and so should be considered for inclusion in the EU Ecolabel criterion.

##### **Other updates:**

The criterion should also be updated to accord with the minimum EU Ecolabel requirements for WCs. More information on this can be found in section 2.9.3 of Preliminary Report.

##### **Proposed update:**

It is proposed that this criterion be updated to refer to the EU Ecolabel requirements for WCs. The WC criterion also includes a methodology for calculation which takes into account dual flush (see update of assessment and verification section below).

**Proposal for revised criterion:**

**WC flushing (1.5 points)**

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

*Assessment & Verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion together with appropriate supporting documentation. The calculation shall be in accordance with Appendix 1 of Commission Decision of 7 November 2013 EU Ecolabel for flushing toilets and urinals.*

**Consultation comments and discussion points:**

Discussion points
Should the points allocation for the proposed criteria be adjusted?

Stakeholder comment	Discussion points
<i>'It's too stringent, because it depends on the equipment (problem of corking of pipes)'</i>	Are the limits set in this criterion too stringent?

**2.2.7.5 Criterion 55: Dishwasher water consumption**

**Current criterion:**

**Dishwasher water consumption (1 point)**

The water consumption of the dishwashers (expressed as W (measured) ) shall be lower or equal to the threshold as defined in the equation below using the same test method EN 50242 and programme cycle as chosen for Directive 97/17/EC:

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

where:

W (measured) = the measured water consumption of the dishwasher in litres per cycle, expressed to the first decimal,

S = the applicable number of standard place settings of the dishwasher. The criterion only applies to household dishwashers.

*Assessment and verification: The applicant shall provide technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the dishwashers or evidence that the dishwashers have been awarded the Community eco-label.*

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**Regulation:**

Directive 97/17/EC was repealed in December 2011 by Commission Delegated Regulation (EU) No 1059/2010 [OJ L 314, 30.11.2010, p.1]. The current criterion needs to be updated to reflect this.

**Feedback:**

Limited feedback was received on this criterion. There were, however, a number of comments suggesting that this criterion could be made more applicable for commercial appliances.

**BEMP:**

Selection of an appropriate size and type of efficient dishwasher with low water consumption is best practice. This is in line with the current EU Ecolabel criterion for dishwasher use.

**Other updates:**

There is no longer an EU Ecolabel product group entitled “Dishwashers”. The assessment and verification section needs to be amended to reflect this.

**Proposed update:**

Reference to Directive 97/17/EC should be removed, as this directive has been updated. In addition, reference to the EU Ecolabel for dishwashers should be removed.

**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

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

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

*where:*

*W<sub>t</sub> = water consumption for the standard cleaning cycle, in litres and rounded to one decimal place*

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## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

## 2.2.7.6 Criterion 56: Washing machine water consumption

### Current criterion:

#### Washing machine water consumption (1 point)

The washing machines used within the tourist accommodation by guests and staff or those used by the tourist accommodation laundry service provider shall use no more than 12 litres of water per kg of wash-load measured according to EN 60456, using the same standard 60 °C cotton cycle as chosen for Directive 95/12/EC.

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

#### **Regulation:**

Commission Decision 95/12/EC was repealed by Commission Delegated Regulation (EU) No 1061/2010 [OJ L 314, 30.11.2010, p. 47]. The current criterion needs to be updated to reflect this.

#### **Feedback:**

The only comment received regarding this criterion, suggested that the use of commercial appliances should be considered.

#### **BEMP:**

Procurement of efficient washing machines is encouraged to reduce both energy and water use. This is in line with the current EU Ecolabel criterion for washing machine use.

#### **Other updates:**

There is no longer an EU Ecolabel product group entitled “Washing Machines”. The assessment and verification section needs to be amended to reflect this.

#### **Proposed update:**

Reference to Commission Decision 95/12/EC should be removed, as this has been updated. In addition, reference to the EU Ecolabel for washing machines should be removed.

### Proposal for revised criterion:

#### Washing machine water consumption (1 point)

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

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

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

### Consultation comments and discussion points:

#### Discussion points

Should the points allocation for the proposed criteria be adjusted?

#### 2.2.7.7 Criterion 57: Tap water temperature and flow

#### Current criterion:

#### Tap water temperature and flow (1 point)

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

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

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

1. No stakeholder feedback was received regarding updates to this criterion.
2. BEMP outlines the benefits of tap flow and temperature regulation: Thermostatic mixers maintain a specific water temperature, adjusting for flow and pressure variations, according to calibrated settings. They enable precise and rapid temperature control at different flow rates, allowing water flows to be stopped and restarted quickly – e.g. to apply shampoo - this minimising water and energy use.

This is already reflected in the EU Ecolabel criterion and so no update is required.

The criterion shall remain as:

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**Proposal for revised criterion:****Tap water temperature and flow (1 point)**

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

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

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.7.8 Criterion 58: Shower timers****Current criterion:****Shower timers (1.5 points)**

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

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

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

1. Very little stakeholder feedback was received regarding updates to this criterion – although the comments that were received mentioned that these shower timers can be ‘annoying’ for guests. However, this position was not widely held and the criterion does not need to be changed as a result of this.
2. BEMP does not provide any updates on the use of shower timers since the previous criteria revision, and so no changes need to be made.

The criterion shall remain as:

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**Proposal for revised criterion:****Shower timers (1.5 points)**

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

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

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.7.9 Criterion 59: Swimming pool cover****Current criterion:****Swimming pool cover (1 point)**

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

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

**Feedback:**

A number of comments were received on this criterion which related to some of the impracticalities of using pool covers. In particular, it was suggested that in Mediterranean areas it is counterproductive to cover swimming pools as during the daytime the water get to hot, and needs to cool down over night, rather than retain its heat.

**BEMP:**

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

**Proposed updates:**

It is suggested that this criterion is rationalised to make a distinction between non-heated and heating swimming pools. In both cases, pool covers should be used to reduce evaporation from the swimming pool, therefore minimising water usage.



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**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.*

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.7.10 Criterion 60: De-icing****Current criterion:****De-icing (up to 1.5 point)**

Where de-icing of roads is necessary, mechanical means or sand/gravel shall be used in order to make roads on the tourist accommodation ground safe in case of ice/snow (1.5 points).

If chemical de-icing is used, substances which do not contain more than 1% chloride ion (Cl<sup>-</sup>) (1 point) or de-icers that have been awarded the Community eco-label or other national or regional ISO Type I eco-labels (1.5 points) shall be used.

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

**Feedback:**

A small amount of stakeholder feedback was received regarding de-icing of tourist accommodation. This primarily suggested that points should also be awarded for sites not carrying out any de-icing and, for example, simply telling staff to be cautious. However, it is suggested that the criterion is not changed to reflect this - in warmer climates no de-icing will also be undertaken and points should not be awarded for this.

**BEMP:**

BEMP primarily relates to minimising the use of chemicals on site, including those used for de-icing. There have been no updates to BEMP since the previous TAS and CSS criteria revision, and so no updates are suggested.

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**Proposed updates:**

No EU Ecolabel has been developed for this category of products. It is proposed to delete the reference to EU Ecolabel.

**Proposal for revised criterion:****De-icing (up to 1.5 point)**

Where de-icing of roads is necessary, mechanical means or sand/gravel shall be used in order to make roads on the tourist accommodation ground safe in case of ice/snow (1.5 points).

If chemical de-icing is used, substances which do not contain more than 1% chloride ion (Cl-) (1 point) or de-icers that have been awarded a national or regional ISO Type I eco-labels (1.5 points) shall be used.

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

**Consultation comments and discussion points****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.7.11 Criterion 61: Indications on water hardness****Current criterion:****Indications on water hardness (up to 2 points)**

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

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation showing how the guest is informed.*

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

1. No stakeholder feedback was received regarding updates to this criterion.
2. BEMP suggests that “in addition to training and signage, clear marking of fill levels on spray bottles can reduce the incidence of incorrect dilution. Dilution volumes should be adjusted for water hardness.” This is covered in the EU Ecolabel criterion.

The criterion will remain as:

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**Proposal for revised criterion:****Indications on water hardness (up to 2 points)**

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

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation showing how the guest is informed.*

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.7.12 Criterion 62: Water saving urinals****Current criterion:****Water saving urinals (1.5 points)**

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

*Assessment and verification: The applicant shall provide detailed supporting documentation of how the tourist accommodation fulfils this criterion.*

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

1. No stakeholder feedback was received relating to this criterion.
2. BEMP measures are outlined as the “Installation or retrofitting of controlled-flush or waterless urinals”. This corresponds with the existing EU Ecolabel criterion and so no update is proposed.

The criterion shall remain as:

**Proposal for revised criterion:****Water saving urinals (1.5 points)**

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

*Assessment and verification: The applicant shall provide detailed supporting documentation of how the tourist accommodation fulfils this criterion.*

## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

## 2.2.7.13 Criterion 63: Indigenous species used for new outdoor planting

### Current criterion:

#### Indigenous species used for new outdoor planting (1 point)

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

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

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

1. Very little stakeholder feedback was received relating to this criterion. It was suggested that species “in accordance with the location” could also be planted or perhaps some allowance made for a few decorative plants.
2. Best practice measures for tourist accommodation include “*Planting of green areas with indigenous species to minimise irrigation requirements*”. This is in line with the current EU Ecolabel criterion and so it is proposed that no update is made as a result of stakeholder comments.

The criterion shall remain as:

### Proposal for revised criterion:

#### Indigenous species used for new outdoor planting (1 point)

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

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

## Consultation comments and discussion points

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

### 2.2.7.14 New criterion: Swimming pool backwashing

The EU Ecolabel energy and disinfectant criteria for swimming pools is currently in line with best practice measures. There are, however, no specific water criteria for swimming pools in the current EU Ecolabel.

Best practice water management for tourist accommodation relates primarily to optimising backwash procedures to ensure water loss is minimised (further detail can be found in Section 4.2.1 of the Preliminary Report.)

It is therefore suggested that a new, optional, criterion is developed to fulfil these BEMP requirements.

However, it should be noted that no other environmental labels carry criteria specifically relating to backwashing of swimming pools.

The following additional criterion is proposed:

<b>Proposal for new criterion:</b>
<b>Swimming pool backwashing (2 points)</b>
<p>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.</p> <p><i>Assessment and verification: the applicant shall demonstrate compliance by providing the document backwashing procedure along with a declaration confirming that this is followed and that staff are aware of the procedure. This will be checked as part of the on-site inspection.</i></p>

#### Consultation comments and discussion points:

<b>Proposed changes to criterion</b>	<b>Discussion points</b>
<p>This criterion has been added to align with BEMP.</p>	<p>Should this new criterion be added? Should this criterion be optional?</p> <p>Do you agree with the proposed assessment and verification method?</p> <p>Should the points allocation for the proposed criteria be adjusted?</p>

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## 2.2.8 Optional criteria related to detergents and disinfectants

### 2.2.8.1 Criterion 64: Detergents

#### **Current criterion:**

##### **Detergents (up to 3 points)**

At least 80% by weight of hand dishwashing detergents and/or detergents for dishwashers and/or laundry detergent and/or all purpose cleaners and/or sanitary detergents and/or soaps and shampoos used by the tourist accommodation shall have been awarded the Community eco-label or other national or regional ISO Type I eco-labels (1 point for each of these categories of detergents up to a maximum of 3 points).

*Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.*

#### **Feedback:**

There was limited stakeholder feedback for this criterion, although several suggestions for updates were made:

- The title of the criterion should be changed as soaps and shampoos (included in the list of products) are not detergents.
- Vinegar and other natural cleaning products could be included.

#### **BEMP:**

BEMP suggests a benchmark of excellence for the use of detergents, which specifies that “at least 70% of the purchase volume of chemical cleaning products (excluding oven cleaners) for dish washing and cleaning are Ecolabelled”.

The current EU Ecolabel criterion exceeds this benchmark and so does not need to be adjusted.

#### **Proposed updates:**

This criterion meets the BEMP threshold and so the percentage threshold does not need to be increased. However, this criterion should relate to shampoos as well as detergents and so the title should be changed to reflect this. Although the inclusion of other natural cleaning products was suggested, it is proposed that this should not be included. This is primarily because ‘natural products’ may be hard to define and it may be difficult to find products which have undergone the same rigorous, life-cycle based assessment as those classified as type-I labels. In turn, this would make verification difficult.

The following change is therefore proposed:

**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: 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.*

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

Stakeholder comment	Discussion points
<i>'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".'</i>	Should 'natural products' be allowed to be used under this criterion?  If yes, is the proposed definition acceptable?

**2.2.8.2 Criterion 65: Indoor and outdoor paints and varnishes****Current criterion:****Indoor and outdoor paints and varnishes (up to 2 points)**

At least 50% of the indoor and/or outdoor painting of the tourist accommodation shall be done with indoor and/or outdoor paints and varnishes awarded the Community eco-label or other national or regional ISO Type I eco-labels (1 point for indoor, 1 for outdoor paints and varnishes).

*Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.*

**Feedback:**

There was limited stakeholder feedback on this criterion. However, it was suggested that paint which has been verified by renowned ecological institutes (not only ecolabels) should be included within scope.

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**BEMP:**

BEMP does not specifically apply to paints and varnishes use, but air quality should be considered in general.

**Proposed updates:**

Although there is little feedback on this criterion, there is likely to be some confusion at the verification stage. Currently, it is unclear whether the tourist accommodation building must *currently* be decorated with at least 50% Ecolabelled paints, or whether this applies to decorating and renovations *after* the application to EU Ecolabel. It is not clear, therefore, how compliance with the criterion is assessed – this could be, for example:

- Based on the amount of EU Ecolabelled paint currently stocked at the tourist accommodation.
- Reliant on a pledge from the tourist accommodation that any painting going forwards will use a proportion of EU Ecolabelled paint.
- Dependent on the tourist accommodation proving that all previous painting was carried out with the correct proportion of EU Ecolabelled paint.

In each of these cases, supporting evidence may be difficult to obtain.

**Due to these issues the following update is proposed:**

The criterion will be maintained, with no changes made. In addition, assessment and verification requirements could be further outlined, in any corresponding User Manual, for example:

*Points can only be awarded for this criterion where the use of Ecolabelled paints can be verified. Where Ecolabelled paint has already been used, the tourist accommodation must be able to: indicate which areas of the building have been painted with this Ecolabelled paint (and estimate this as a percentage of the total building), and specify which brand of paint was used (providing relevant receipts/invoices). Where decorating/renovations are yet to be carried out, receipts/invoices should be kept as evidence that Ecolabelled paints have been used. Picture evidence would also be useful to show that Ecolabelled paint is being used. If paint is stored on site, this will be checked during any site visit.*

Verification requirement would, however, still be open to some interpretation. In this instance, the criterion would remain as:

**Proposal for revised criterion:****Indoor and outdoor paints and varnishes (up to 2 points)**

At least 50% of the indoor and/or outdoor painting of the tourist accommodation shall be done with indoor and/or outdoor paints and varnishes awarded the EU eco-label or other national or regional ISO Type I eco-labels (1 point for indoor, 1 for outdoor paints and varnishes).

*Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label*



### 2.2.8.3 Criterion 66: Car washing only in specially outfitted areas

#### Current criterion:

##### Car washing only in specially outfitted areas (1 point)

Car washing shall not be allowed, or shall be allowed only in areas which are specially equipped to collect the water and detergents used and channel them to the sewerage system.

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.*

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

1. No stakeholder feedback was received regarding this criterion.
2. No changes to BEMP regarding car washing have been made – this assumes that that current criterion is still relevant.

Note that this criterion applies to camp sites only.

The criterion will remain as:

#### Proposal for revised criterion:

##### Car washing only in specially outfitted areas (1 point)

Car washing shall not be allowed, or shall be allowed only in areas which are specially equipped to collect the water and detergents used and channel them to the sewerage system.

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.*

#### Consultation comments and discussion points:

##### Discussion points

Should the points allocation for the proposed criteria be adjusted?

#### 2.2.8.4 Criterion 67: Support to alternatives to artificial barbecue lighter

##### Current criterion:

##### Support to alternatives to artificial barbecue lighter (1 point)

Excluding artificial barbecue lighting products, alternative products such as rape seed oil, hemp products, shall be sold in shops.

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

**This criterion does not require updating, and so it is proposed that no changes are made.**

**This is based on the following:**

1. Very little stakeholder feedback was received regarding this criterion; the only suggestions being that perhaps this is of little relevance to most tourist accommodation sites.
2. BEMP does not provide specific guidance on the use of alternatives to artificial barbecue lighters.
3. No new products are available on the market which may be used as other alternatives to barbecue lighters.

This criterion may, however, be of particular relevance to campsites and so should be retained, with no change.

The criterion will remain as:

##### Proposal for revised criterion:

##### Support to alternatives to artificial barbecue lighter (1 point)

Excluding artificial barbecue lighting products, alternative products such as rape seed oil, hemp products, shall be sold in shops.

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

##### Consultation comments and discussion points:

###### Discussion points

Should the points allocation for the proposed criteria be adjusted?

## 2.2.8.5 Criterion 68: Dosage of disinfectants or natural/ecological swimming pools

### Current criterion:

#### Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (1 point)

The swimming pool shall have an automatic dosage system that uses the minimum amount of disinfectant for the appropriate hygienic result (1 point).

Or

The swimming pool shall be of the ecological/natural type with only natural elements guaranteeing for the hygiene and safety of the bathers (1 point).

*Assessment and verification: The applicant shall provide a technical documentation concerning the automatic dosage system or the type of ecological/natural swimming pool and its maintenance.*

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

1. The only stakeholder feedback received highlighted the costs involved in installing natural swimming pools. This does not suggest that any change to the criterion needs to be made.
2. BEMP for swimming pools outlines best practice measures as:
  - a. Installation of, or conversion of an existing pool to, a natural pool.
  - b. Installation of automatic dosing.

This is directly in line with the existing EU Ecolabel criteria and so it is proposed that this criterion is maintained.

The criterion will remain as:

### Proposal for revised criterion:

#### Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (1 point)

The swimming pool shall have an automatic dosage system that uses the minimum amount of disinfectant for the appropriate hygienic result (1 point).

Or

The swimming pool shall be of the ecological/natural type with only natural elements guaranteeing for the hygiene and safety of the bathers (1 point).

*Assessment and verification: The applicant shall provide a technical documentation concerning the automatic dosage system or the type of ecological/natural swimming pool and its maintenance.*

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## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

#### 2.2.8.6 Criterion 69: Mechanical cleaning

##### Current criterion:

##### Mechanical cleaning (1 point)

The tourist accommodation shall have precise procedures for conducting chemical-free cleaning, such as use of micro-fibre products or other non-chemical cleaning materials or activities with similar effects.

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

##### Feedback:

There were very few comments on this criterion. However, it was suggested that ‘mechanical cleaning’ should be better defined and should allow the use of natural products.

##### BEMP:

There is no specific BEMP guidance on mechanical cleaning but some comments on efficient cleaning methods:

*“Best practice is also to train staff on the implementation of water- and chemical-efficient cleaning methods, and to procure environmentally certified consumables for bedrooms and bathrooms.”*

##### Proposed update:

Currently the criterion is unclear as to how much cleaning must be undertaken manually to obtain points.

It is proposed that the requirements for this criterion are clarified – for an applicant to receive this point, all cleaning (unless required by law or contrary to proper hygiene practices) should be carried out as chemical-free. Although feedback suggested the use of natural product should also be allowed, this may cause problems in the verification stage in defining which products can be included under this definition.

The following update is therefore proposed:

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**Proposal for revised criterion:****Mechanical cleaning (1 point)**

The tourist accommodation shall have precise procedures for conducting chemical-free cleaning, such as use of micro-fibre products or other non-chemical cleaning materials or activities with similar effects. To fulfil this criterion, all cleaning must be carried out without the use of chemicals except where required by law or by hygiene or health and safety practices. Note that the use of water is acceptable as a ‘chemical-free cleaning’ method.

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

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.8.7 Criterion 70: Organic gardening****Current criterion:****Organic gardening (2 points)**

Outside areas shall be managed either without any use of pesticides or according to organic farming principles, as laid down in Council Regulation (EC) No 834/2007, or as laid down in national law or recognised national organic schemes.

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

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

1. Regulation (EC) No 834/2007 is still in force and so no update is required.
2. No feedback was received regarding this criterion.
3. Although organic gardening is not specified as BEMP, best practise suggests minimising the use of pesticides and other chemicals throughout the tourist accommodation. This corresponds with existing EU Ecolabel criteria and so no change is proposed.

The criterion will therefore remain as:

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**Proposal for revised criterion:****Organic gardening (2 points)**

Outside areas shall be managed either without any use of pesticides or according to organic farming principles, as laid down in Council Regulation (EC) No 834/2007, or as laid down in national law or recognised national organic schemes.

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

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.8.8 Criterion 71: Insect and pest repellents****Current criterion:****Insect and pest repellents (up to 2 points)**

Architectural design of the accommodation and hygiene practices (such as building on stilts to prevent rats entering premises, use of mosquito nets and coils) shall ensure that the use of insect and pest repellents in the tourist accommodation is kept to a strict minimum (1 point).

If insect and pest repellents are used, only substances which are allowed for organic farming (as laid down in Regulation (EC) No 834/2007) or that have been awarded the Community ecolabel or other national or regional ISO Type I ecolabels shall be used (1 point).

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

**Feedback:**

Very little stakeholder feedback was received regarding this criterion; one suggestion was that points should be offered for not using insect repellent at all. However, this will be impossible to prove at the verification stage and so it is suggested that this change is not made.

**BEMP:**

BEMP does not provide specific guidance on the use of insect and pest repellent but does highlight that pesticide use should generally be reduced – as is encouraged by the existing criteria.

**Proposed updates:**

No EU Ecolabel has been developed for this category of products. It is proposed to delete the reference to EU Ecolabel.

### Proposal for revised criterion:

#### Insect and pest repellents (up to 2 points)

Architectural design of the accommodation and hygiene practices (such as building on stilts to prevent rats entering premises, use of mosquito nets and coils) shall ensure that the use of insect and pest repellents in the tourist accommodation is kept to a strict minimum (1 point).

If insect and pest repellents are used, only substances which are allowed for organic farming (as laid down in Regulation (EC) No 834/2007) or that have been awarded a national or regional ISO Type I ecolabels shall be used (1 point).

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

### Consultation comments and discussion points:

Discussion points
Should the points allocation for the proposed criteria be adjusted?

Stakeholder comment	Discussion points
<i>'It should be specified in the text that mosquito nets must be available in all rooms or bungalows.'</i>	Should the provision of mosquito nets in all rooms be required to meet this criterion?

## 2.2.9 Optional criteria related to waste

### 2.2.9.1 Criterion 72: Composting

#### Current criterion:

#### Composting (up to 2 points)

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

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

**This criterion does not require updating, and so it is proposed that no changes are made.**

**This is based on the following:**

1. Very little stakeholder feedback was received regarding this criterion; the only suggestion was that the criterion should specify that composting should be carried

out on site. However, this may be impractical for many sites – this is reflected currently by the criterion which allows composting through a number of routes.

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

The criterion will therefore remain as:

<b>Proposal for revised criterion:</b>
<b>Composting (up to 2 points)</b>
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).
<i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation if relevant.</i>

#### **Consultation comments and discussion points:**

<b>Discussion points</b>
Should the points allocation for the proposed criteria be adjusted?

#### **2.2.9.2 Criterion 73: Disposable drink containers**

<b>Current criterion:</b>
<b>Disposable drink containers (2 points)</b>
Disposable drink containers shall not be offered in the areas under the ownership or the direct management of the tourist accommodation.
<i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with an indication of which such disposable products are used, if any, and the legislation requiring this.</i>

#### **Feedback:**

There were no specific comments on this criterion. However, Criterion 20: Disposable products, refers to drinks containers, and a number of stakeholders commented on this. Overall, there was a conflicting view on whether or not there should be a total ban on all disposable drinks containers (i.e. should Criterion 73 be made mandatory?). However, this was not a widely discussed point and so no conclusions can be easily drawn from this.

#### **BEMP:**

BEMP does not relate specifically to disposable drinks containers, but does recommend avoiding procurement of single-use items.



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**Other updates:**

Criterion 19: Disposable products, states that “Disposable drinking systems (cups and glasses), plates and cutlery shall only be used if they made out of renewable raw materials and are biodegradable and compostable according to EN 13432.” This criterion is mandatory and so all tourist accommodation sites will adhere to this as a minimum.

**Proposed update:**

The current criterion awards points to tourist accommodation site who take no action at all, i.e. those who do not offer any drinks to guests.

**Consultation comments and discussion points:**

Discussion points
Stakeholders are invited to provide their feedback on the update of this criterion. Should this criterion should therefore be removed or be mandatory?.

**2.2.9.3 Criterion 74: Fat/oil disposal****Current criterion:****Fat/oil disposal (up to 2 points)**

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

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

**Feedback:**

No feedback was received for this criterion.

**BEMP:**

BEMP does not provide specific guidance on fat/oil disposal, but does indicate that “*separated waste collection facilities [should be available] throughout the establishment, to ensure that there is a clear procedure for staff waste separation, and to contract relevant recycling services at least for glass, paper and cardboard, plastics, metals and organic waste.*”

**Other updates:**

This criterion exceeds that which is outlined as best practice. However, mandatory Criterion 19: Waste separation, states that waste (including fats/oils) shall be separated into categories that can be “handled separately by the local or national waste management facilities”. This suggests that it is mandatory for fat/oil to be collected and disposed of appropriately, where facilities are available.

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

## 2.2.9.4 Criterion 75: Run-off from car parks

### Current criterion:

#### Run-off from car parks (1 point)

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

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

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

1. No stakeholder feedback was received regarding this criterion.
2. BEMP does not provide any updates for guidance regarding car park run-off, but specifies that this should be correctly managed. This suggests no update to the criterion is required.

However, the existing criterion is only applicable to camp sites – it is suggested that car park run-off could also be relevant other types of tourist accommodation and so the criterion should be expanded to reflect this.

The following is therefore proposed:

### Proposal for revised criterion:

#### Run-off from car parks (1 point)

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

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

### Consultation comments and discussion points:

#### Discussion points

Should the points allocation for the proposed criteria be adjusted?

## 2.2.9.5 Criterion 76: Used textiles, furniture and other products

### Current criterion:

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

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

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

**This criterion does not require major updating, and so it is proposed that the only changes that are made relate to clarifications. This is based on the following:**

1. Very little stakeholder feedback was received regarding this criterion; the only suggestions being that perhaps more information could be provided as to how this criterion can be verified – often charitable organisation may not provide receipts when items are donated. It is suggested that this is clarified
2. BEMP has not been updated since the previous TAS and CSS criteria revision, and still promotes the importance of the waste hierarchy as follows:

**Reduce:** Create as little waste as possible by not producing it to begin with – implement green procurement, do not over-order, select products with little packaging or returnable packaging.

**Re-use:** Consider where certain items can be re-used, sold or donated to others that can use them.

**Sort:** Have a system in place for sorting everyday waste items such as bottles, cans, cardboard and paper for recycling. Consider what else might be recycled, taking into account local disposal possibilities.

**Recycle:** Send sorted waste for recycling.

The EU Ecolabel criterion promotes re-use of used textiles, furniture and other products in line with this waste management hierarchy.

### 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.*

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## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

## 2.2.10 Optional criteria related to other services

### 2.2.10.1 Criterion 77 (campsite only): Regulation of traffic

#### Current criterion:

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

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

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

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

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

Note that this criterion only applies to campsites.

The criterion will therefore remain as:

#### Proposal for revised criterion:

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

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

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

## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

### 2.2.10.2 Criterion 78 (campsite only): Campsite generated traffic

#### Current criterion:

##### Campsite generated traffic (1 point) (campsites only)

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

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

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

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

Note that this criterion only applies to campsites.

The criterion will remain as:

#### Proposal for revised criterion:

##### Campsite generated traffic (1 point) (campsites only)

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

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

#### Consultation comments and discussion points:

##### Discussion points

Should the points allocation for the proposed criteria be adjusted?

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

#### Current criterion:

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

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

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

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

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

Note that this criterion only applies to campsites.

The criterion will remain as:

<b>Proposal for revised criterion:</b>
<b>Trolleys for guests on the campsite (1 point) (campsites only)</b>
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.
<i>Assessment and verification: The applicant shall provide an explanation of how the campsite fulfils this criterion, together with appropriate supporting documentation.</i>

## Consultation comments and discussion points

Discussion points
Should the points allocation for the proposed criteria be adjusted?

### 2.2.10.4 Criterion 80 (campsite only): Unsealed surfaces

<b>Current criterion:</b>
<b>Unsealed surfaces (1 point) (campsites only)</b>
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.
<i>Assessment and verification: The applicant shall provide an explanation of how the campsite fulfils this criterion, together with appropriate supporting documentation.</i>

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

1. No stakeholder feedback was received regarding this criterion.
2. BEMP has not been updated since the previous criterion revision of TAS and CSS criteria – therefore no update is required. Current BEMP references EU Ecolabel requirements as good practice in management of outside areas, including Criterion 80: Unsealed surfaces.

Note that this criterion only applies to campsites.

The criterion will therefore remain as:

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**Proposal for revised criterion:****Unsealed surfaces (1 point) (campsites only)**

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

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

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.10.5 Criterion 81: Roof landscaping****Current criterion:****Roof landscaping (2 points)**

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

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

**Feedback:**

Feedback on this criterion was limited, although several stakeholders highlighted that meeting this criterion can be expensive and can be very difficult to achieve. One respondent did, however, suggest that 'façade greening' should also be considered.

**BEMP:**

BEMP suggests that "To maximise on-site biodiversity through planting of native species, installation of green or brown roofs and walls, and to minimise water consumption for irrigation and light pollution arising from outdoor lighting (e.g. through use of correctly-angled low-pressure sodium lamps)."

This is in line with the stakeholder feedback which suggests that both roof and façade greening should be considered in a criterion update.

**Proposed updates:**

Façade greening can provide the same benefits as roof landscaping and can be a good option where roofing is not suitable for planting. It is therefore suggested that the criterion be updated to include both roof and façade landscaping.

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**Proposal for revised criterion:****Roof and façade landscaping (2 points)**

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

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

**Consultation comments and discussion points:**

Proposed changes to criterion	Discussion points
It is suggested that one more point is added as this can be difficult to achieve	Should the points allocation for the proposed criteria be adjusted?

**2.2.10.6 Criterion 82: Environmental communication and education****Current criterion:****Environmental communication and education (up to 3 points)**

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

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

**Feedback:**

Limited feedback was received for this criterion – where comments were made, these suggested that this criterion could be simplified. However, it was also suggested that any environmental education should be carried out in coordination with the public body who is dealing with, and that “constant and effective interaction” with the guest should be encouraged. Despite this comment, it is suggested the criterion remains the same, to avoid further complications.

**BEMP:**

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

**Proposed update:**

Other comparable labels for tourist accommodation include criteria on promoting local goods and services, including providing guests with information on “*guides, restaurants, markets and craft centres*” [Travelife criteria (2012)]. It is suggested that this criterion is updated to



encourage tourist accommodation sites to make this information available to guests. This criterion will remain optional.

The proposed criterion is therefore:

**Proposal for revised criterion:**

**Environmental communication and education (up to 3 points)**

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

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

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

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

**Consultation comments and discussion points:**

Discussion points
Should the points allocation for the proposed criteria be adjusted?

Stakeholder comment	Discussion points
<i>'As these Ecolabel criteria will be updated to reflect social aspects related to impact on local communities, this criterion should be made mandatory.'</i>	Should this criterion remain optional?

**2.2.10.7 Criterion 83: No smoking in common areas and rooms**

**Current criterion:**

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

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

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

**Feedback:**

A number of comments were received regarding smoking in tourist accommodation – the majority of which suggested that all EU Ecolabelled tourist accommodation should be no-smoking throughout. However, outside of Europe where restrictions on smoking are more lax, a total ban on smoking throughout the tourist accommodation may be difficult to comply with.

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

**BEMP:**

BEMP does not provide any updates for smoking in tourist accommodation, but does suggest that air quality should be considered. This does not require an update to the existing criterion.

**Proposed update:**

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

These options will be dependent on the agreed changes made to Criterion 22: No smoking in common areas.

**Option 1:**

This criterion could be maintained.

Proposal for revised criterion, Option 1:
<p><b>Option 1: No smoking in common areas and rooms (up to 1.5 points)</b></p> <p>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.</p> <p><i>Assessment and verification: The applicant shall indicate the number and nature of the areas and shall indicate which of these are non-smoking.</i></p>

**Option 2:**

This criterion could be tightened to a complete ban in all indoor areas, including guest rooms.

Proposal for revised criterion, Option 2:
<p><b>Option 2: No smoking in common areas and rooms (up to 1.5 points)</b></p> <p>Smoking shall not be allowed in 100% of indoor common areas <u>and guest accommodation.</u></p> <p><i>Assessment and verification: The applicant shall <u>provide a declaration to state that the tourist accommodation meets this criterion.</u></i></p>

**Consultation comments and discussion points:**

Proposed changes to criterion	Discussion points
<p>Two options have been proposed:</p> <ol style="list-style-type: none"> <li>1. This criterion is maintained (points are awarded for making up to 70% or up to 95% of guest rooms ‘non-smoking’)</li> <li>2. A total ban on smoking in all guest rooms.</li> </ol>	<p>Which option is preferred?</p> <p>Should the points allocation for the proposed criteria be adjusted?</p>

## 2.2.10.8 Criterion 84: Bicycles

### Current criterion:

#### Bicycles (1.5 points)

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

*Assessment and verification: The applicant shall provide an explanation of how the tourist accommodation fulfils this criterion.*

#### **Feedback:**

There was a wide range of feedback on this criterion, ranging from suggestions to increase the number of bikes required (to at least 6 for every room) to reducing the number required (as, for campsites in particular, guests may bring bikes with them) and suggesting that bikes should be made available to staff.

In addition, several comments suggested that points should be obtained through having a 'real local and close partnership' with bike hire companies in the area; this would require that this offer is actively communicated to guests.

#### **BEMP:**

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

This suggests that encouragement of the use of bikes by guests is important, whether these are offered directly by the tourist accommodation or not.

#### **Proposed updates:**

It is suggested that this criterion be updated so that points are awarded to tourist accommodation sites which have active links with bicycle hire companies and communicate this clearly to guests. It is also important that the meaning of 'active links' is clear.

The following update is suggested:

### Proposal for revised criterion:

#### Bicycles (1.5 points)

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

Or

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

*Assessment and verification: The applicant shall provide an explanation of how the tourist accommodation fulfils this criterion along with any information to be provided to guests. 'Active links' between tourist accommodation and a bicycle hire company should be visible on site. For example, the tourist accommodation should be actively promoting the hire company to guests and there should be evidence to show this e.g. promotional information. Where the hire company is not based on the site of the tourist accommodation, some practical considerations should be made. For example, the bicycle hire company may deliver bikes to the tourist accommodation service.*

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## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

#### 2.2.10.9 Criterion 85: Pick up service

##### Current criterion:

##### Pick up service (1 point)

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

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

##### Feedback:

The comments on this criterion suggested that points should be awarded to tourist accommodation sites if they are actively communicating and operating a pick-up service at arrival, not limiting this to only the use of 'environmentally friendly means of transportation'. A number of respondents suggested that the use of 'electric cars or horse sleds' is not very common, but perhaps car sharing or collective transport could be considered.

##### BEMP:

No specific BEMP is outlined for the use of a pick-up service, although the use of public transport and 'environmentally friendly' transport is to be encouraged. This suggests that the criterion should not be so restrictive, and that the main focus should be to encourage the use of public transport for arrival by providing a pick-up service.

##### Other updates:

A number of the LCA studies which were reviewed, revealed that transport to and from the tourist accommodation can have a significant environmental impact; the mode of transport is therefore important.

However (as outlined in the Stakeholder feedback), electric cars and horse sleds are not very common. In addition, the environmental impact of electric cars is dependent on the carbon intensity of the grid. It is collective transport that has been shown to have the greatest effect in reducing the environmental impact of transportation. The criterion should therefore focus on the promotion of this.

##### Proposed update:

It is therefore proposed that this criterion be updated to include collective transport, and better reflect common practice

### 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)

*Assessment and verification: The applicant shall provide an explanation on how the tourist accommodation fulfils this criterion and an example how it is communicated to guests. A collective transport scheme may, for example, include sharing transport (such as a minibus) between hotels. Guests booked in at different tourist accommodation sites may be picked up from public transport points in the same vehicle, and dropped off at the appropriate accommodation.*

### Consultation comments and discussion points:

#### Discussion points

Should the points allocation for the proposed criteria be adjusted?

#### 2.2.10.10 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).

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

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

1. Very few comments were received related to this criterion; no specific recommendations were made, but it was suggested that an indication of quantity could be added for returnable and refillable bottles. However, this is likely to be impractical for a number of tourist accommodation sites.
2. BEMP has not been updated since the previous TAS and CSS criteria revision, and still promotes the importance re-using products, as outlined in the waste hierarchy:
  - a. **Reduce:** Create as little waste as possible by not producing it to begin with – implement green procurement, do not over-order, select products with little packaging or returnable packaging.
  - b. **Re-use:** Consider where certain items can be re-used, sold or donated to others that can use them.
  - c. **Sort:** Have a system in place for sorting everyday waste items such as bottles, cans, cardboard and paper for recycling. Consider what else might be recycled, taking into account local disposal possibilities.

- d. **Recycle:** Send sorted waste for recycling.

Through promoting this re-use, the EU Ecolabel criterion is in line with BEMP. The following will therefore be maintained:

<b>Proposal for revised criterion:</b>
<b>Returnable or refillable bottles (up to 3 points)</b>
The tourist accommodation shall offer beverages in returnable/refillable bottles: soft drinks (1 point), beer (1 point), water (1 point).
<i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation from the suppliers of the bottles.</i>

#### Consultation comments and discussion points:

Discussion points
Should the points allocation for the proposed criteria be adjusted?

#### 2.2.10.11 Criterion 87: Use of rechargeable products

<b>Current criterion:</b>
<b>Use of rechargeable products (up to 2 points)</b>
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).
<i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation from the suppliers of the batteries and/or the refillers of the toner cartridges.</i>

#### **Feedback:**

No stakeholder feedback was received for this criterion.

#### **BEMP:**

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

This is in line with the current EU Ecolabel criterion (for batteries and printer cartridges), although it is suggested that the criterion is updated to require that all consumables use rechargeable batteries, not just TV remotes. In addition, it is suggested that a point is added for tourist accommodation sites which don't use plastic bin liners – this should be clearly outlined in any User Manual, as follows:

*One point is available where tourist accommodations' do not use single-use, disposable bin liners. For example, no points can be given where bin liners in guests' rooms and/or common areas are disposed of each day when rooms are cleaned.*

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**Proposed update:**

It is suggested that the criterion is updated to better fit with BEMP. These changes are reflected in the criterion below:

**Proposal for revised criterion:****Reusable and rechargeable products (up to 3 points)**

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

*Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation from the suppliers of the batteries and/or the refillers of the toner cartridges.*

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.10.12 Criterion 88: Paper products****Current criterion:****Paper products (up to 3 points)**

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

*Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.*

**Feedback:**

There was no stakeholder feedback on this criterion, and so it is assumed that this criterion should be maintained.

**BEMP:**

BEMP encouraged minimisation of the use of resources, “especially paper and ink” and to “select environmentally certified materials and services (e.g. printing services)” where possible. Again, this is in line with the current EU Ecolabel criteria for paper products.

### **Other updates:**

Although this criterion does currently reflect best practice, it is suggested that the percentage of paper product required to obtain point is increased. There is now a very high market availability of these products and this should be reflected in the criteria update.

### **Proposed update:**

This criterion is significant in reducing the amount of paper used on site – this is especially relevant as conference centres will now be explicitly included as ‘in scope’ for tourist accommodation. It is suggested that the percentage of paper products required to have the Ecolabel (or equivalent) be increased to reflect this.

### **Proposal for revised criterion:**

#### **Paper Products (up to 3 points)**

90% of toilet/tissue paper and/or office paper and/or printed paper used shall have been awarded the EU eco-label or other national or regional ISO Type I eco-labels (1 point for each of these three categories of paper products).

*Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.*

### **Consultation comments and discussion points:**

#### **Discussion points**

Should the points allocation for the proposed criteria be adjusted?

### **2.2.10.13 Criterion 89: Durable goods**

#### **Current criterion:**

#### **Durable goods (up to 3 points)**

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

*Assessment and verification: The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label.*

### **Feedback:**

No feedback was received on this criterion.

### **BEMP:**

In general, BEMP specifies that eco-labelled products (those certified to Type I schemes such as the EU Ecolabel) are preferable - environmental impacts have been considered and are minimised compared to other products on the market.



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**Other updates:**

This criterion can be updated to include any new EU Ecolabelled product groups which have become available since the previous revision of the TAS and CSS criteria. These products include:

- Tapware
- Flushing toilets and urinals

**Proposed update:**

The criterion should be updated to include tapware and flushing toilets and urinals. No other changes are proposed.

**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.*

**Consultation comments and discussion points:****Discussion points**

Should the points allocation for the proposed criteria be adjusted?

**2.2.10.14 Criterion 90: Local food products****Current criterion:****Local food products (up to 3 points)**

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

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

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation*

**Feedback:**

There was limited feedback on this criterion specifically, but there were a number of comments highlighting the importance of encouraging use of local goods, not just food products. More

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detail on this can be found in section 4.5.1 of the Preliminary Report which discusses social criteria, such as impact on local community.

**BEMP:**

BEMP for kitchens in tourist accommodation is to “assess food and drink supply chains to identify environmental hotspots and key control points, including choice editing of menus to avoid particularly damaging ingredients (e.g. some out-of-season fruit), and selection of environmentally-certified products.” In general, it is considered best practice to source all products locally where possible.

**Proposed update:**

In addition (as with Criterion 82, above) many comparable labels for tourist accommodation include criteria on procuring local goods and services. Although the EU Ecolabel criterion does specific local food products, it is proposed that this criterion could be broadened to include other local goods. This criterion will remain optional.

To bring this criterion into line with other environmental and sustainability labels for tourism, it is suggested that the second paragraph of the criterion is made mandatory (this is outlined in section 0).

The following (optional) criterion is therefore proposed:

<b>Proposal for revised criterion:</b>
<p><b><u>Local products (optional up to 3 points)</u></b></p> <p>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).</p> <p><u>The tourist accommodation actively chooses local suppliers of other goods and services (1.5 points).</u></p> <p><i>Assessment and verification: the applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.</i></p>

## Consultation comments and discussion points:

Discussion points
Should the points allocation for the proposed criteria be adjusted?

Stakeholder comment	Discussion points
<i>'This verification is easier and it is in my opinion more significant to sustain local products. I would make this mandatory.'</i>	Should this criterion remain optional?
<i>'As these Ecolabel criteria will be updated to reflect social aspects related to impact on local communities, this criterion should be made mandatory.'</i>	

### 2.2.10.15 Criterion 91: Organic food

Current criterion:
<b>Organic food (up to 3 points)</b>  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.  <i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation.</i>

#### **Regulation:**

There has been no change or update to Regulation (EC) No 834/2007 which might affect this criterion. However, it should be recognised that organic food produced according to an ISO Type I eco-label will have to comply with this regulation.

#### **Feedback:**

Several comments were received from Austria and Germany. In these countries it is possible for restaurants and hotels to become certified for the use of only organic products, and several respondents suggested that additional points should be awarded where this is the case. However, as these schemes are not available across Europe (or globally) it is suggested that the criterion should not be changed to reflect this but the assessment and verification section should note that these schemes may be used as supporting documentation of compliance.

#### **BEMP:**

BEMP for food provision refers to “choice editing of menus to avoid particularly damaging ingredients (e.g. some out of season fruit), and selection of environmentally-certified products.” This is in line with criterion 91: organic food. This BEMP is also supported by Criterion 90: local products.

### **Proposed update:**

No change is proposed as a result of stakeholder feedback or the BEMP. Regulation (EC) No 834/2007 is also still in place. However, it is suggested that mention of ISO Type I eco-labels is removed as product containing these labels will themselves meet (EC) No 834/2007.

The following is therefore proposed:

<b>Proposal for revised criterion:</b>
<p><b>Organic food (up to 3 points)</b></p> <p>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.</p> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. In some countries, it is possible for restaurants and hotels to become certified when they use only organic products. Where a tourist accommodation is certified to this type of scheme (or similar) this information could be provided as evidence of compliance with this criterion.</i></p>

### **Consultation comments and discussion points:**

<b>Discussion points</b>
Should the points allocation for the proposed criteria be adjusted?

### **2.2.10.16 Criterion 92: Indoor air quality**

<b>Current criterion:</b>
<p><b>Indoor air quality (up to 4 points)</b></p> <p>The tourist accommodation shall provide an optimal indoor air quality through one or both of the following measures:</p> <ul style="list-style-type: none"><li>— 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);</li><li>— 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).</li></ul> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. As regards the fragrance free requirement, a list of components/ingredients of fragrance free washing and cleaning shall be considered as sufficient.</i></p>

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**Regulation:**

Council Directive 89/106/EEC was repealed by Regulation (EU) No 305/2011 [OJ L 88, 4.4.2011, p.5]. Point 3 of Annex I remains unchanged except the addition of one condition: *'the release of dangerous substances into drinking water or substances which have an otherwise negative impact on drinking water'*

**Feedback:**

The difficulty in achieving this criterion is highlighted by a number of stakeholders. The most common suggestion is that “only [painting, decorating, furniture...]” is too strict and not practical to achieve. A number of stakeholders also wanted clarification about how this criterion could be achieved – in particular about how air quality can be “proved”.

**BEMP:**

There is no BEMP specific to indoor air quality for tourist accommodation.

**Proposed update:**

It is suggested that this criterion remains unchanged. Although this may be difficult to achieve, this criterion is optional and reflects best practice. The regulation outlined in the criterion does, however, require updating.

The following is therefore proposed:

**Proposal for revised criterion:****Indoor air quality (up to 4 points)**

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

- the rooms, rental accommodation and common areas shall correspond to the requirements laid down in point 3 of Annex I to Regulation (EU) No 305/2011 and shall contain only painting, decorating, furniture and other materials certified with the EU eco-label or another equivalent low emission ISO Type I environmental label (2 points);
- the rooms, rental accommodation and common areas shall be fragrance free, the sheets, towels and textiles shall be washed with fragrance free detergents (1 point) and cleaning shall be carried out with fragrance free means (1 point).

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. As regards the fragrance free requirement, a list of components/ingredients of fragrance free washing and cleaning shall be considered as sufficient.*

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## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

## 2.2.11 Optional criteria related to general management

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

#### Current criterion:

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

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

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

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

1. EMAS registration and ISO 14001 certification are still in force and so no update is required.
2. No comments were received regarding this criterion.
3. BEMP encourages the formulation of an environmental management plan – as is encouraged through this existing criterion.

The following will therefore be maintained:

#### Proposal for revised criterion:

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

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

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

## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

## 2.2.11.2 Criterion 94: EMAS registration, ISO certification of suppliers

### Current criterion:

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

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

*Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification by at least one of his main suppliers.*

**This content of this criterion does not require updating, and so it is proposed that no changes are made. This is based on the following (identical to the rationale for maintaining criterion 93, above):**

1. EMAS registration and ISO 14001 certification are still in force and so no update is required.
2. No comments were received regarding this criterion.
3. BEMP encourages the formulation of an environmental management plan – as is encouraged through this existing criterion.

The following will therefore be maintained:

### Proposal for revised criterion:

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

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

*Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification by at least one of his main suppliers.*

### Consultation comments and discussion points:

#### Discussion points

Should the points allocation for the proposed criteria be adjusted?

### 2.2.11.3 Criterion 95: Compliance by subcontractors with mandatory criteria

#### Current criterion:

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

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

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

#### **Feedback:**

No stakeholder feedback was received for this criterion.

#### **BEMP:**

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

#### **Proposed update:**

It is suggested that reference is made to laundry services, in line with BEMP. This results in the following update:

#### Proposal for revised criterion:

##### Compliance by subcontractors with mandatory criteria (up to 4.5 points)

Where additional services of food, laundry or leisure/fitness activities are subcontracted, those services shall comply with all the mandatory criteria of this Annex that apply to those specific services (1.5 points for each service of food and beverage and/or laundry and/or leisure facilities which is present on the tourist accommodation).

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

#### Consultation comments and discussion points:

##### Discussion points

Should the points allocation for the proposed criteria be adjusted?



## 2.2.11.4 Criterion 96: Energy and water meters

### Current criterion:

#### Energy and water meters (up to 2 points)

The tourist accommodation shall have additional energy and water meters installed so as to allow data collection on consumption of different activities and/or machines, such as rooms, laundry and kitchen service and/or specific machines like refrigerators, washing machines, etc. (1 point). Every pitch has its own energy and/or water meter (1 point).

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

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

1. Stakeholder opinions on this criterion were conflicting; suggestions included either removing this criterion or making this mandatory. On balance, it is suggested that this criterion is maintained as optional to consider both sides of this argument. In addition, this criterion is not unachievable – tourist accommodation sites must already collect mandatory data on energy and water consumption within the site as a whole (Criterion 27: energy and water consumption data). This option criterion awards points for further investment in monitoring activities.
2. BEMP encourages the use of meters to best identify possible efficiency improvements – this is reflected in the current EU Ecolabel criterion and so no update is required.

The following will therefore be maintained:

### Proposal for revised criterion:

#### Energy and water meters (up to 2 points)

The tourist accommodation shall have additional energy and water meters installed so as to allow data collection on consumption of different activities and/or machines, such as rooms, laundry and kitchen service and/or specific machines like refrigerators, washing machines, etc. (1 point). Every pitch has its own energy and/or water meter (1 point).

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

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## Consultation comments and discussion points:

### Discussion points

Should the points allocation for the proposed criteria be adjusted?

#### 2.2.11.5 Criterion 97: Additional environmental actions

##### Current criterion:

##### Additional environmental actions (maximum 3 points)

Either:

(a) Additional environmental actions (up to 1.5 points each, to a maximum of 3 points): The management of the tourist accommodation shall take actions, additional to those provided for by way of criteria in this Section or in Section A, to improve the environmental performance of the tourist accommodation. The Competent Body assessing the application shall attribute a score to these actions not exceeding 1.5 points per action.

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a full description of each additional action the applicant wishes to be taken into account.*

Or:

(b) Eco-label award (3 points): The tourist accommodation shall be awarded one of the national or regional ISO Type I eco-labels.

*Assessment and verification: The applicant shall provide appropriate evidence of having been awarded an eco-label.*

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

1. Only a few comments were received for this criterion. Stakeholders mainly suggested that social measures could be added here – however, social aspects have been included in Criterion 27: information to guests and with the development of a new criterion, Fundamental principles and rights at work (see section 0). It was also suggested that this criterion may be too rigid and that it can be difficult for smaller sites to plan these additional environmental actions. It is suggested, however, that the criterion remains; this is an optional criterion and so does not restrict smaller sites from achieving the EU Ecolabel.
2. BEMP encourages the installation of an environmental management plan, in line with the current EU Ecolabel criterion.

The existing criterion will therefore be maintained. However, it is suggested that User Manuals clarify this criterion by providing the following information:

*Additional environmental actions should be those which have a significant effect in reducing one or all of the following: energy consumption, water consumption, chemical substance use and/or waste production.*

**Proposal for revised criterion:**

**Additional environmental actions (maximum 3 points)**

Either:

(a) Additional environmental actions (up to 1.5 points each, to a maximum of 3 points): The management of the tourist accommodation shall take actions, additional to those provided for by way of criteria in this Section or in Section A, to improve the environmental performance of the tourist accommodation. The Competent Body assessing the application shall attribute a score to these actions not exceeding 1.5 points per action.

*Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a full description of each additional action the applicant wishes to be taken into account.*

Or:

(b) Eco-label award (3 points): The tourist accommodation shall be awarded one of the national or regional ISO Type I eco-labels.

*Assessment and verification: The applicant shall provide appropriate evidence of having been awarded an eco-label.*

**Consultation comments and discussion points:**

Discussion points
Should the points allocation for the proposed criteria be adjusted?

Stakeholder comment	Discussion points
<p><i>'Perhaps we can add an optional criterion to enhance the social action carried out by the hotel. '</i></p> <p><i>For example : Additional social action - The manager of the TAS should take social action to improve wellness at work</i></p>	<p>Should an additional social criterion be added for 'additional social actions'?</p> <p>If yes, what examples of additional social action should be considered?</p>

## 2.2.12 General discussion points related to the complete set of criteria

Discussion points
Do you agree with the general structure of the proposed criteria set?

Additional information	Discussion points
<p>Efficient laundry and catering service provision has been identified as a key environmental hot spot in the technical analysis. One 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%).</p> <p>Currently there are no EU Ecolabel criteria for laundry and/or catering services.</p> <p>Very few alternative ecolabels present criteria on green catering and laundry supply. The Nordic swan does have a separate criteria set for laundry services – but this does not seem to link to the hotel criteria.</p> <p>However, the Nordic Swan also has a set of requirements if the hotel has a restaurant – but these are very similar to the EU Ecolabel (local food, organic food etc.).</p>	<p>Should an additional criterion be added for 'green catering and laundry supply'?</p> <p>If yes, should it be mandatory?</p> <p>If yes, should it be added to the general management section?</p>

## 2.3 Impact of changes to criteria

The update of criteria for tourist accommodation (section 2.2) has resulted in changes to the optional points available. Table 4 outlines the number of points available in the current criteria, compared with the points available after the proposed updates have been considered. A full table showing each criterion can be found in Annex III.

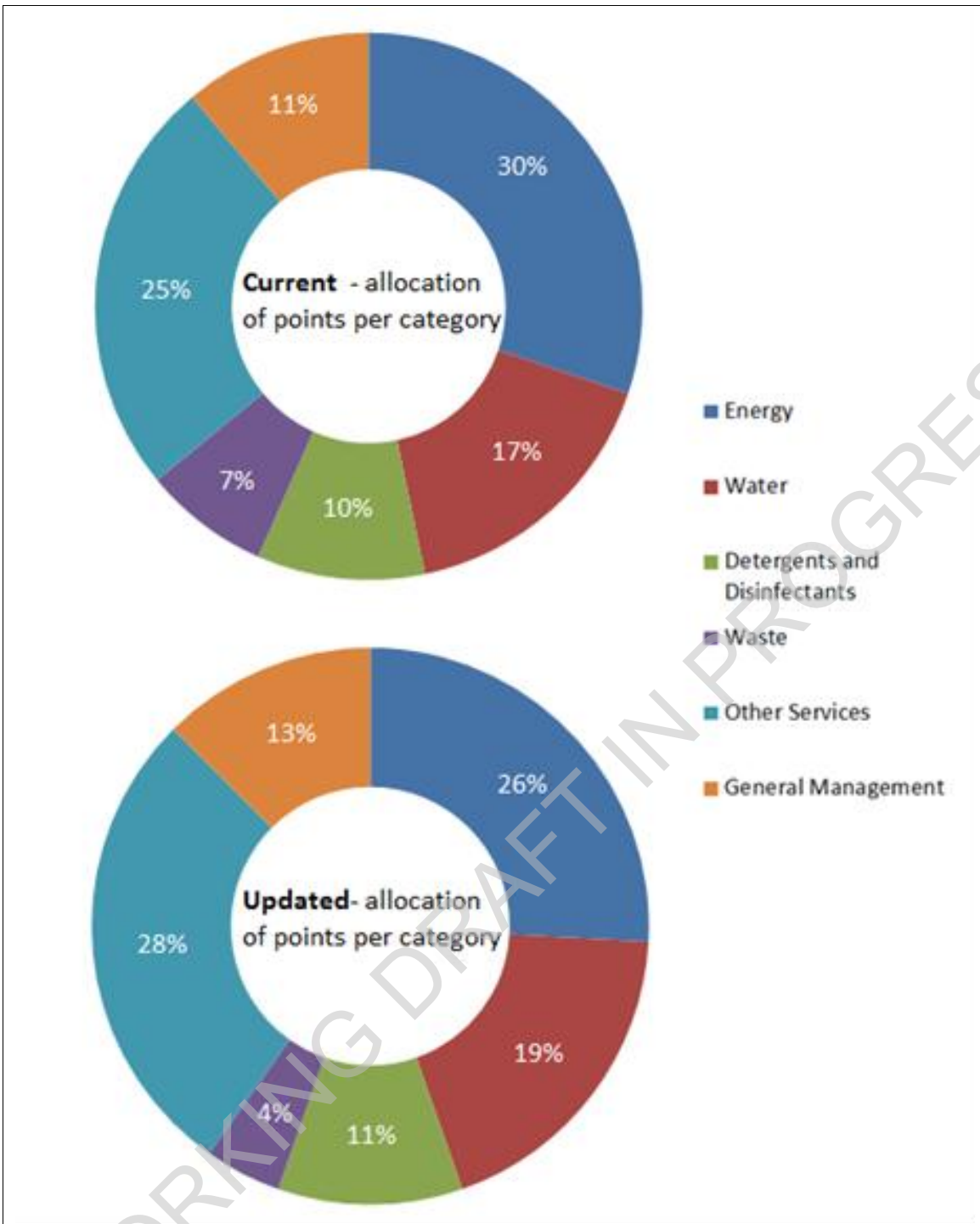
**Table 4: Maximum number of points achievable for current and updated optional criteria**

Criteria category	Tourist accommodation, excluding campsites		Campsites only	
	Current - maximum points achievable	Update – maximum points achievable	Current - maximum points achievable	Update – maximum points achievable
Energy	36.5	29	36.5	29
Water	20	21*	20	21*
Detergents and Disinfectants	12	12	13	13
Waste	9	5	10	6
Other Services	30	31	34	35
General Management	13.5	14	13.5	14
<b>Total score</b>	<b>121</b>	<b>112</b>	<b>127</b>	<b>118</b>

\*includes the proposed new criterion for swimming pool backwashing (2 points).

There are six additional criteria which relate specifically to campsites, and so the maximum number of point achievable is higher. This is also reflected in the number of points which the applicant must reach to quality for the award of the EU Ecolabel.

The figure below compares the current and updated allocation of points per category, for tourist accommodation. This shows that although several of the criteria have been updated, the overall impact of a change in points is limited.



**Figure 5: Allocation of points per category (energy, water, waste etc.) for the current and updated EU Ecolabel for tourist accommodation**

**Scenario analysis:**

The EU Ecolabel criteria for TAS and CSS require a certain number of points to be achieved from optional criterion. The tourist accommodation update has resulted in fewer points being available. It is therefore necessary to consider whether or not the number of points required to award the EU Ecolabel should be altered to reflect this.

Current criteria for TAS require the following number of points:

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**Current TAS points allocation:**

*In order to qualify for award of the eco-label, tourist accommodations must score a minimum of 20 points.*

*The total score required shall be increased by 3 points for each of the following additional services which are offered that are under the management or ownership of the tourist accommodation:*

- *Food services (including breakfast),*
- *Leisure/fitness activities, which include saunas, swimming pools and all other such facilities which are within the tourist accommodation grounds. If the leisure/fitness activities consist in a wellness centre, the score required shall be increased by 5 points instead of 3,*
- *Green/outside areas, including parks and gardens which are open to guests.*

Current criteria for CSS require the following number of points:

**Current CSS points allocation:**

*If the campsite does not offer other accommodations suitable for the provision of shelter to lodgers as part of its services, the minimum score required is 20; if it does, the minimum score required is 24.*

*The total score required shall be increased by 3 points for each of the following additional services which are offered that are under the management or ownership of the campsite:*

- *Food services (including breakfast),*
- *Leisure/fitness activities, which include saunas, swimming pools and all other such facilities which are within the campsite grounds. If the leisure/fitness activities consist in a wellness centre, the score required shall be increased by 5 points, instead of 3;*
- *Green areas which are not part of the campsite structure, such as parks, woods and gardens which are open to guests.*

It is important to assess the impacts of a change to points allocation to ensure that the EU Ecolabel for tourist accommodation is still achievable for those organisations in scope, i.e. that all relevant applicants can receive enough points to qualify for the EU Ecolabel regardless of their location, size or access to local, national or other markets.

To do this, two scenarios will be considered (note, for comparison, these scenarios were also considered in the 2008 EU Ecolabel revision for TAS and CSS):

- A. A tourist accommodation which has no access to product or services with national or international ISO Type I labels, energy efficiency certifications or products.
- B. A tourist accommodation which has no means for high investments or interventions.

In each case, there should also be a consideration as to whether the tourist accommodation has food services, outside areas or fitness/wellness centres – where this is the case, an increased number of points is required.

Table 55 shows the maximum points available for tourist accommodations which provide food services, outside areas and fitness/wellness centres.

Table 6 Show the points available; where tourist accommodation does not offer these facilities.

**Table 5: Maximum points available for tourist accommodation with food services, outside areas and fitness/wellness centres for each scenario**

	Maximum points achievable	A. no access to Ecolabelled products	B. avoiding high cost investments or interventions
31	4	4	0
32	2	0	0
33	1.5	0	0
34	1.5	0	0
35	1.5	0	0
36	1.5	0	0
37	Removed	-	-
38	1.5	1.5	0
39	1.5	1.5	0
40	1.5	0	0
41	2	0	0
42	1.5	1.5	0
43	Removed	-	-
44	3	0	0
45	1	1	0
46	1	1	1
47	1.5	1.5	0
48	1	1	0
49	1.5	0	0
50	1.5	1.5	1.5
51	3	3	0
52	1.5	1.5	1.5
53	1.5	1.5	0
54	1.5	1.5	0
55	1	0	0
56	1	0	0
57	1	1	0
58	1.5	1.5	0
59	1	1	0
60	1.5	1.5	1.5
61	2	2	1
62	1.5	0	0
63	1	1	0
64	3	0	3
65	2*	0	2*
66 (campsite only)	1	1	1
67	1	0	1
68	1	1	0
69	1	1	1
70	2	2	2
71	2	0	1
72	2	2	2
73	Removed	-	-
74	Removed	-	-
75 (campsite only)	1	1	1
76	3	3	3
77 (campsite only)	1	1	1
78 (campsite only)	1	1	1
79 (campsite only)	1	1	0
80 (campsite only)	1	1	1
81	2	2	0
82	3	3	1.5
83	1.5*	1.5*	1.5*
84	1.5	1.5	1.5
85	1	1	0



	Maximum points achievable	A. no access to Ecolabelled products	B. avoiding high cost investments or interventions
86	3	3	0
87	3	0	3
88	3	0	3
89	3	0	0
90	3	0	3
91	3	0	3
92	4	0	0
93	3	0	0
94	1.5	0	0
95	4.5	0	0
96	2	2	0
97	3	3	0
Additional proposed criterion:			
Swimming pool backwashing	2	2	0
Tourist accommodation TOTAL	113.5	58	38
Campsite TOTAL	119.5	64	43

*\* Two proposals have been developed for these criteria – one of which is to remove them from the updated EU Ecolabel for tourist accommodation. If, after consultation, the decision is made to remove these criteria, the total maximum points achievable for each of these scenarios will be as follows:*

	Maximum	A.	B.
Tourist accommodation TOTAL	110	55.5	34.5
Campsite TOTAL	116	61.5	39.5

For this scenario (tourist accommodation or campsite **with** food services, outside areas and a fitness/wellness centre) the maximum number of points is:

- 31 for tourist accommodation – in both scenarios this number of points is achievable
- 35 for campsites – this number of points is also achievable in each of the scenarios above.

**Table 6: Maximum points available for tourist accommodation without food services, outside areas and fitness/wellness centres for each scenario**

Criterion number	Maximum points achievable	A. no access to Ecolabelled products or energy certificates	B. avoiding high investments or interventions
31	4	4	0
32	2	0	0
33	1.5	0	0
34	1.5	0	0
35	1.5	0	0
36	1.5	0	0
38	1.5	1.5	0
39	1.5	1.5	0
40	1.5	0	0
41	2	0	0
42	1.5	1.5	0
44	3	0	0
45	1	1	0
47	1.5	1.5	0
50	1.5	1.5	1.5
51	2	2	0
53	1.5	1.5	0
54	1.5	1.5	0
56	1	0	0
57	1	1	0
58	1.5	1.5	0
61	2	2	1
62	1.5	0	0
64	3	0	3
65	2*	0	2*
66 (campsite only)	1	1	1
69	1	1	1
71	2	0	1
72	2	2	2
75 (campsite only)	1	1	1
76	3	3	3
77 (campsite only)	1	1	1
78 (campsite only)	1	1	1
79 (campsite only)	1	1	0
80 (campsite only)	1	1	1
81	2	2	0
82	3	3	1.5
83	1.5*	1.5*	1.5*
84	1.5	1.5	1.5
85	1	1	0
86	3	3	0
87	3	0	3
88	3	0	3
89	3	0	0
92	4	0	0
93	3	0	0
94	1.5	0	0
95	4.5	0	0
96	2	2	0
97	3	3	0
Tourist accommodation TOTAL	91	45	25
Campsite TOTAL	97	51	31

\* Two proposals have been developed for these criteria – one of which is to remove them from the updated EU Ecolabel for tourist accommodation. If, after consultation, the decision is made to remove these criteria, the total maximum points achievable for each of these scenarios will be as follows:

	Maximum	A.	B.
Tourist accommodation TOTAL	88.5	42.5	22.5
Campsite TOTAL	94.5	48.5	28.5

For this scenario (tourist accommodation or campsite **without** food services, outside areas and a fitness/wellness centre) the maximum number of points is:

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

As shown by the analysis above, the number of points currently required is achievable for each scenario. For example, a tourist accommodation site with food, leisure and green areas has to achieve 24 points as a minimum – there are 113.5 available which means they need to receive 21% of these points (previously 121 points were available, which required the tourist accommodation to receive 20% of the total available.)

It is therefore proposed that the points allocation remains the same. The following is suggested:

**Proposed update:**

*In order to qualify for award of the eco-label, tourist accommodations must score a minimum of 20 points. Where a campsite offers other accommodations suitable for the provision of shelter to lodgers as part of its service, the minimum score required is 24.*

*The total score required shall be increased by 3 points for each of the following additional services which are offered that are under the management or ownership of the tourist accommodation:*

- *Food services (including breakfast);*
- *Leisure/fitness activities, which include saunas, swimming pools and all other such facilities which are within the tourist accommodation grounds. If the leisure/fitness activities consist in a wellness centre, the score required shall be increased by 5 points, instead of 3;*
- *Green/ outside areas, including parks and gardens which are open to guests. For campsites, this includes green areas which are not part of the campsite structure, such as parks, woods and gardens which are open to guests.*

In addition to the text, above, several stakeholders suggested that that the definitions of ‘food service’ and ‘wellness centres’ should be further defined. These definitions could be included in any supplementary User Manual for tourist accommodation:

**Food services (including breakfast):** *this includes the provision of either hot or cold food to guests, made or prepared on site. This may include, for example: an on-site restaurant which is operated by the tourist accommodation, a breakfast buffet, a bar serving food or providing room service to guests.*

**Wellness Centre:** *this includes any on-site establishment which offers health services for the body and mind- in addition to leisure/fitness activities including saunas, swimming pools and other similar facilities. A wellness centre may include, for example: a spa offering massages/aromatherapy etc. or a yoga centre.*

## Implications of updates to mandatory criteria

The proposed revision to the current TAS and CSS criteria also requires some updates to mandatory criterion. As with the points allocation for optional criteria, it is necessary to ensure that these mandatory points are achievable and do not place unnecessary burden on applicants, existing licence holders or CB who have to verify applications.

Table 7 outlines the impact of updates to mandatory criteria based on the following:

- A) Leads to a reduced burden on CBs (through clarifying or simplifying assessment and verification requirements).
- B) Leads to a reduced burden for tourist accommodation (through clarifying requirements or simplifying criterion)
- C) May require some additional cost input or investment of time to meet the criterion (as compared to the previous criterion)
- D) The update will have no additional burden or cost implications.

**Table 7: Impact of updates to mandatory criteria**

Criterion		A	B	C	D
<b>Energy</b>					
1	Electricity from renewable sources				✓
2	Coal and heavy oils	No change			
3	Efficiency and heat generation				✓
4	Air conditioning				✓
5	Energy efficiency of buildings				✓
6	Window insulation				✓
7	Switching off heating or air conditioning	No change			
8	Switching off lights	No change			
9	Energy efficient light bulbs	✓	✓		
10	Outside heating appliances	✓			
<b>Water</b>					
11	Water flow from taps and showers	✓		✓	
12	Waste bins in toilets	No change			
13	Urinal flushing	No change			
14	Changing towels and sheets	No change			
15	Correct waste water disposal	No change			
16	Chemical toilet disposal point (CDP)	No change			
17	Disinfectants	No change			
<b>Waste</b>					

Criterion		A	B	C	D
18	Waste separation by guests	✓		✓	
19	Waste separation				✓
20	Disposable products	✓	✓	✓	
21	Breakfast Packaging	✓	✓	✓	
<b>Other services</b>					
22	No smoking in common areas	No change			
23	Public transportation	✓			
<b>General management</b>					
24	Maintenance and servicing of boilers and air conditioning systems				✓
25	Policy setting and environmental programme	No change			
26	Staff training	✓	✓	✓	
27	Information to guests	✓	✓	✓	
28	Energy and water consumption data	No change			
29	Other data collection	No change			
30	Information appearing on the eco-label	No change			
<b>New mandatory criterion</b>					
	Fundamental principles and rights at work	✓	✓	✓	
	Local food products	✓	✓		

The analysis above suggests that the majority of the updates to criteria for tourist accommodation will have either a positive impact or no effect on applicants or CBs. However, in a few instances, the criterion update may result in some additional burden to the tourist accommodation. This will primarily be a need for improved administrative and operating practices (for example, through the introduction of the new criterion 'Fundamental principles and rights at work' or through the need for improved staff training.) It should be noted, however, that many tourist accommodation sites will already be operating to these standards and the updated criterion will simply reflect this. In addition, a number of the updated criteria have also been simplified; although there may be some additional input required to achieve these, the time spend in the application and assessment phases may be reduced as a result of this.

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## ACRONYMS

AA	Automobile Association
AHWG	Ad Hoc Working Group
ANPA	Italian Environment Protection Agency
AWC	annual water consumption
BEMP	Best environmental management practice
CB	Competent Body
CDP	chemical toilet disposal point
CSR	corporate social responsibility
CSS	camp site services
EDEN	European Destinations of Excellence
EEI	Energy Efficiency Index
EEIG EU	Hotel Standard Quality Seal
EMAS	Environmental Management and Audit Scheme
ERDF	European Regional Development Fund
ESF	European Social Fund
EUEB	European Union Ecolabelling Board
EuQSCS	European Quality Standard for Camping Sites
FEE	Foundation for Environmental Education
GCV	gross calorific value (energy input)
GDP	gross domestic product
GSTC	Global sustainable tourism council
GTBS	Green Tourism Business Scheme
GWD	Groundwater Directive (2006/118/EC)
HCMI	Hotel Carbon Measurement Initiative
HDD/CDD	Heating degree day/Cooling degree day
HES	Hotel Energy Solutions
HOTREC	Hotels, Restaurants and Cafes (the European Umbrella organisations for national associations representing hotels, restaurants, cafes and similar organisations)
HVAC	Heating, ventilation and air conditioning
IHG	InterContinental Hotels Group
ILO	International Labour Organisation

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ISO	International Organization for Standardization
ITP	International Tourism Partnership
LCA	life cycle assessment
LED	light-emitting diode (lamp)
NACE	Nomenclature of Economic Activities
NECSTouR	Network of European regions committed to the issue of sustainable and competitive tourism
NO <sub>x</sub>	Nitrogen Oxides
SBS	Structural Business Statistics
TAS	tourist accommodation services
UHT	Ultra-heat treated (milk)
UNEP	United Nations Environment Programme
UNWTO	UN World Tourism Organization
WEEE	Waste Electrical and Electronic Equipment
WTTC	World Travel and Tourism Council

WORKING DRAFT IN PROGRESS



## ANNEX I BEMP COMPARISON WITH EU ECOLABEL CRITERIA

The table below lists the most important environmental aspects (or hotspots) for tourism, as identified in the 2013 report *Best environmental management practice in the tourism sector* (JRC). This is cross referenced against the current EU Ecolabel criteria to demonstrate that all of the significant environmental hotspots identified are already considered in existing criteria – a significant update of the criteria is therefore not required.

Best Environmental Management Practice in the Tourism Sector (2013) The most important actors and environmental aspects identified for the tourism sector.	Current EU Ecolabel criteria for TAS/CSS Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).
<b>Cross-cutting</b>	
1. Undertake an assessment of the most important direct and indirect environmental aspects associated with the enterprise, and to apply relevant performance indicators and compare with relevant benchmarks of excellence as described in this document.	The EU Ecolabel includes criteria for: Developing an environmental management plan including environmental targets and monitoring (criteria 24, 27 and 28).
2. Identify supply chain environmental hotspots, considering the entire value chain, and to identify relevant control points (e.g. product selection, avoidance, green procurement, supplier criteria) that can be used to minimise the environmental impact over the value chain.	Considering the impact of purchases of goods and services and green procurement, specifically encouraging the use of other EU Ecolabelled products (criteria 63, 64, 81 and 82). Ensuring efficient use of products, purchasing durable goods, maximising the period of use and minimising waste (criteria 5, 6, 7, 8, 14, 19, 20, 41, 42, 43, 71, 73, 79, 80, 82). Supply chain management including green sourcing of food (criteria 83, 84).
<b>Destination managers</b>	
1. Establish a unit or organisation responsible for the strategic sustainable development of the destination that coordinates relevant departments to implement specific actions within the framework of a Destination Plan.	M General requirements In order to apply for the eco-label, the applicant must comply with Community, national and local legal requirements. In particular, it shall be guaranteed that:
2. Monitor the state of biodiversity within the destination, and to implement a biodiversity conservation and management plan that protects and enhances total biodiversity within the destination through, for example, development restrictions and compensation measures.	1. The physical structure is built legally and respects all relevant laws or regulations of the area on which it is built, especially any related to landscape and biodiversity conservation. 2. The physical structure respects Community, national and local laws and regulations regarding energy conservation, water sources, water treatment and disposal, waste collection and disposal, maintenance and servicing of equipment, safety and health dispositions.
3. Ensure that environment-related services within the destination, especially water supply, wastewater treatment, waste management (especially recycling measures) and public transport/traffic management, are sufficient to cope with peak demand during tourism high season in a sustainable manner.	3. The enterprise is operational and registered, as required by national and/or local laws and its staff are legally employed and insured.
4. Monitor the environmental impact of large events, and environmental management plans for such events that avoid and mitigate impacts, such as the provision of additional public transport to the event, the provision of good waste management facilities, and the offsetting of carbon and biodiversity impacts.	M 24. Policy setting and environmental program The management shall have an environmental policy and shall draw up a simple environmental policy statement and a precise action program to ensure the application of the environmental policy. The action program shall identify targets on environmental performance regarding energy, water, chemicals and waste, which shall be set every two years, taking into consideration the optional criteria and the data collected where available. It shall identify the person who will act as the environmental manager of the tourist 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.  M 25. Staff training The tourist accommodation shall provide information and training to the staff, including written procedures or

Best Environmental Management Practice in the Tourism Sector (2013) The most important actors and environmental aspects identified for the tourism sector.	Current EU Ecolabel criteria for TAS/CSS Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).
	manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour.
<b>Tour operators</b>	
BEMP for tour operators	This is outside the scope of the EU Ecolabel criteria which is for TAS/CSS rather than for tour operators. However, the Ecolabel criteria does cover the following aspects which look at travel options and other wider environmental impacts: M 22. Public transportation Information shall be made easily available to the guests and staff on how to use public transportation to and from the tourist accommodation through its main means of communication. O 77. Bicycles (1,5 points) Bicycles shall be made available to guests. O 78. Pick up service (1 point) The tourist accommodation shall offer guests travelling with public transport pick up service at arrival with environmentally friendly means of transportation such as electric cars or horse sleds.
<b>Accommodation water consumption</b>	
1. Undertake a water consumption audit and monitor water consumption across key water-consuming processes and areas (i.e. sub-metering) in order to identify efficiency improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection, including during housekeeping.	M 27. Energy and water consumption data The tourist accommodation shall have procedures for collecting and monitoring data on overall energy consumption (kWh), electricity and other energy sources consumption (kWh), and water consumption (litres). Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as consumption per overnight stay and per m <sup>2</sup> of indoor area. The tourist accommodation shall report the results yearly to the Competent Body that assessed the application. O 89. Energy and water meters (1 point)
2. Install efficient water-fittings, including low-flow spray taps and low-flow thermostatic-controlled showers, low- and dual-flush WCs, and waterless urinals. In the interim, aerators may be retro-fitted to existing fittings.	M 11. Water flow from taps and showers The average water flow of the taps and shower heads, excluding kitchen and bath tub taps, shall not exceed 9 litres/ minute. M 13. Urinal flushing All urinals shall be fitted with either automatic (timed) or manual flushing systems so that there is no continuous flushing. O 52. Water flow from taps and shower heads (1,5 points) Not exceed 8litres/minute O 53. WC flushing (1,5 points) Consume 6 litres/full flush, or less O 61. Water saving urinals (1,5 points)
3. Minimise laundry requirements through green procurement of bedclothes and towels (in terms of size, density, colour, material), and by requesting or encouraging guests to reuse bedclothes and towels. Best practice is also to train staff on the implementation of water- and chemical-efficient cleaning methods, and to procure environmentally certified consumables for bedrooms and bathrooms.	M 14. Changing towels and sheets Guests shall be informed of the environmental policy of the tourist accommodation on their arrival. This information shall explain that sheets and towels in the rooms shall be changed on their request, or by default at the frequency established by the environmental policy of the tourist accommodation or requested by law and/or national regulations. This applies only to tourist accommodations where the service includes the provision of towels and/or sheets.
4. Procure the most water- (and thus energy-) efficient washing extractors and the	O 43. Energy efficient appliances

Best Environmental Management Practice in the Tourism Sector (2013) The most important actors and environmental aspects identified for the tourism sector.	Current EU Ecolabel criteria for TAS/CSS Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).
most energy efficient driers (e.g. heat-pump driers) and ironers, to reuse rinse water and, in high-water-stress areas, main wash water following micro-filtration. Best practice is also to recover heat from waste water and exhaust ventilation air.	(d) (1 point): All household washing machines shall be of class A energy efficiency as laid down in Commission Directive 95/12/EC (3). (f) (1 point): All electric tumble driers shall be class A energy efficiency as laid down in Commission Directive 95/13/EC (6). O 55. Washing machine water consumption (1 point)
5. Select an efficient laundry service provider that is certified by an ISO Type-1 ecolabel or that complies with criteria in such labels (e.g. Nordic Ecolabelling, 2009), or to ensure that on-site large-scale laundry operations comply with such criteria.	Currently there are no EU Ecolabel criteria for laundry services, although this is a possible future candidate for criteria development. However, the EU Ecolabel does consider on-site laundry, which is covered by the following criteria: O 55. Washing machine water consumption (1 point) O 60. Indications on water hardness (up to 2 points) In laundry areas to allow better use of detergents by guests O 63. Detergents (up to 3 points) At least 80% by weight of hand dishwashing detergents and/or detergents for dishwashers and/or laundry detergent and/or all-purpose cleaners and/or sanitary detergents and/or soaps and shampoos used by the tourist accommodation shall have been awarded the Community eco-label or other national or regional ISO Type I eco-labels.
6. Optimise the frequency and timing of backwashing based on pressure drop rather than fixed schedules, to use ozonation or UV treatment and careful dosing control to minimise chlorination, and to recover heat from exhaust ventilation air.	O 37. Heat recovery (up to 1,5 points) The tourist accommodation shall have a heat recovery system for 1 (1 point) or 2 (1,5 points) of the following categories: refrigeration systems, ventilators, washing machines, dishwashers, swimming pool(s), and sanitary waste water. O 66. 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 (1 point).
7. Install a grey water recovery system that recovers grey water for use in indoor processes (e.g. toilet flushing) following treatment or exterior processes (e.g. irrigation), or a rainwater collection system that uses rainwater for indoor purposes.	O 50. Use of rainwater (2 points) and recycled water (2 points)
<b>Waste management</b>	
1. Prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps, shampoos) and by buying cleaning agents in concentrated and bulk form – and by careful management of procurement volumes.	M 19. Disposable products Unless required by law, disposable toiletries (not refillable) such as shampoo and soap, and other products (not reusable), such as shower caps, brushes, nail files, etc. shall not be used. Where such disposable products are requested by law the applicant shall offer to guests both solutions and encourage them with appropriate communication to use the non-disposable products. Disposable drinking systems (cups and glasses), plates and cutlery shall only be used if they made out of renewable raw materials and are biodegradable and compostable according to EN 13432. M 20. Breakfast Packaging Except where required by law, no single dose packages shall be used for breakfast or other food service, with the exception of dairy fat spreads (such as butter, margarine and soft cheese), chocolate and peanut butter spreads, and diet or diabetic jams and preserves. O 71. Disposable drink containers (2 points)

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
<p>The most important actors and environmental aspects identified for the tourism sector.</p> <p>2. Provide separated waste collection facilities throughout the establishment, to ensure that there is a clear procedure for staff waste separation, and to contract relevant recycling services at least for glass, paper and cardboard, plastics, metals and organic waste.</p>	<p>Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).</p> <p>M 17. Waste separation by guests Guests shall be informed how and where they can separate waste according to the best local or national systems within the areas to which the tourist accommodation belongs. Adequate containers for waste separation shall be available in the rooms or in easily reachable distance.</p> <p>M 18. Waste separation Waste shall be separated into the categories that can be handled separately by the local or national waste management facilities, with particular care regarding hazardous waste, which shall be separated, collected and disposed of as listed in Commission Decision 2000/532/EC (1) and appropriate disposal shall be sought. This list includes toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances as specified in Directive 2002/96/EC (2) and Directive 2002/95/EC of the European Parliament and of the Council (3).</p>
<p>3. Where wastewater is not sent to a centralised wastewater treatment plant is to install an on-site wastewater treatment system that treats wastewater at least to secondary, and preferably to tertiary, level.</p>	<p>M 15. Correct waste water disposal The tourist accommodation shall inform guests and staff on the correct use of the waste water discharge, in order to avoid the disposal of substances that might prevent waste water treatment in accordance with the municipal waste water plan and Community regulations. Where a waste water plan from the Municipality is not available, the tourist accommodation shall provide a general list of substances that shall not be disposed of with the waste water according to the Directive 2006/118/EC of the European Parliament and of the Council (1).</p>
<p><b>Accommodation energy</b></p>	
<p>1. Undertaken an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficient improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection.</p>	<p>M 27. Energy and water consumption data The tourist accommodation shall have procedures for collecting and monitoring data on overall energy consumption (kWh), electricity and other energy sources consumption (kWh), and water consumption (litres). Data shall be collected where possible, monthly or at least yearly, for the period when the tourist accommodation is open, and shall also be expressed as consumption per overnight stay and per m<sup>2</sup> of indoor area. The tourist accommodation shall report the results yearly to the Competent Body that assessed the application.</p> <p>M 23. Maintenance and servicing of boilers and air conditioning systems Maintenance and servicing of boilers and air conditioning systems shall be carried out at least yearly, or more often if so required by law or need, by appropriately qualified professionals, following CEI and national standards where these apply, or according to the manufacturer's instructions.</p> <p>O 89. Energy and water meters (1 point)</p>
<p>2. Ensure that new buildings are compliant with the highest achievable energy ratings, as indicated by conformance with PassiveHouse and Minergie P standards, and that existing buildings are retrofitted to minimise heating and cooling energy requirements.</p>	<p>M 5. Energy efficiency of buildings The tourist accommodation shall comply with the national legislation and local building codes related to energy efficiency and the energy performance of buildings.</p> <p>O 39. Energy performance audits for buildings (1,5 points)</p>
<p>3. To minimise energy consumption from HVAC systems by installing zoned temperature control and controlled ventilation with heat recovery (ideally controlled by CO<sub>2</sub> sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics.</p>	<p>M 3. Efficiency and heat generation If a new heat generating capacity is installed within the duration of the eco-label award, it shall be a high efficiency cogeneration unit (as defined by Article 3 and Annex III of Directive 2004/8/EC of the European Parliament and of the Council (1), a heat pump or an efficient boiler. In the latter case, the efficiency of such a boiler shall be of 4 stars (ca. 92% at 50 °C and 95% at 70 °C), measured according to Council Directive 92/42/EEC (2), or according to relevant product norms and regulations for those boilers not covered by this Directive.</p>

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	M 4. Air conditioning Any household air conditioner bought within the duration of the eco-label award shall have at least Class A energy efficiency as laid down in Commission Directive 2002/31/EC (4), or have corresponding energy efficiency. O 41. Automatic switching-off of air conditioning and heating systems (1,5 points) O 42. Bioclimatic architecture (3 points)
4. To install efficient (e.g. ecolabelled) heat pumps for heating and cooling, or where possible ground water cooling.	O 36. Heat pump (up to 2 points)
5. To install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural-light and time.	M 9. Energy efficient light bulbs (a) At least 80% of all light bulbs in the tourist accommodation shall have an energy efficiency of Class A as defined in Commission Directive 98/11/EC (3). This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs. (b) 100% of light bulbs that are situated where they are likely to be turned on for more than five hours a day shall have an energy efficiency of Class A as defined by Directive 98/11/EC. This does not apply to light fittings whose physical characteristics do not allow use of energy-saving light bulbs.
6. To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier.	M 1. Electricity from renewable sources At least 50% of the electricity used for all purposes shall come from renewable energy sources, as defined in Directive 2001/77/EC of the European Parliament and of the Council (1). O 30. Generation of electricity through renewable energy sources (up to 4 points) O 31. Energy from renewable energy sources (up to 2 points)
<b>Kitchens</b>	
1. Assess food and drink supply chains to identify environmental hotspots and key control points, including choice editing of menus to avoid particularly damaging ingredients (e.g. some out of season fruit), and selection of environmentally-certified products.	O 83. Local food products (up to 3 points) O 84. Organic food (up to 2 points)
2. To minimise avoidable food waste by careful menu development and portion sizing, and to ensure that all organic waste is separated and send for anaerobic digestion where available, or alternatively incineration with energy recovery or local/on-site composting.	O 70. Composting (up to 2 points)
3. To select efficient washing equipment, including trigger-operated low-flow pre-rinse spray valves, efficient dishwashers and connectionless steamers, and to monitor and benchmark water consumption in kitchen/restaurant areas.	O 43. Energy efficient refrigerators (1 point), ovens (1 point) dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (1 point) — (maximum of 3 points) O 54. Dishwasher water consumption (1 point) O 55. Washing machine water consumption (1 point)
4. To select efficient cooking equipment, including induction-hob or pot-sensor-controlled gas ovens, efficient refrigeration equipment that uses a natural refrigerant such as ammonia or carbon dioxide, and to control ventilation according to demand.	O 43. Energy efficient refrigerators (1 point), ovens (1 point) dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (1 point) — (maximum of 3 points) O 45. Refrigerator positioning (1 point) To reduce energy waste
<b>Campsites (EU Ecolabel criteria for Camp site services)</b>	
1. To provide guests with interactive on-site education of environmental issues, including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles).	M 27. Information to guests The campsite shall provide information to the guests, including conference participants, on its environmental policy, including safety and fire safety aspects, inviting them to contribute to its implementation. The

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	<p>information conveyed to the guests shall refer to the actions taken on behalf of its environmental policy and provide information about the Community eco-label. This information shall be actively given to the guests at the reception, together with a questionnaire covering their views about the environmental aspects of the campsite. Notices inviting guests to support the environmental objectives shall be visible to the guests, especially in the common areas and the rental accommodation.</p> <p>O 82. Environmental communication and education (up to 3 points)</p>
<p>2. To maximise on-site biodiversity through planting of native species, installation of green or brown roofs and walls, and to minimise water consumption for irrigation and light pollution arising from outdoor lighting (e.g. through use of correctly-angled low-pressure sodium lamps).</p>	<p>O 81. Roof landscaping (2 points) O 71. Insect and pest repellents (up to 2 points) Kept to a strict minimum or not used O 70. Organic gardening (2 points) O 63. Indigenous species used for new outdoor planting (1 point) O 50. Automatic switching off outside lights (1,5 points) O 51. Use of rainwater (2 points) and recycled water (2 points) O 52. Automatic watering systems for outside areas (1,5 points) To optimise watering times and water consumption</p>
<p>3. To minimise energy consumption for water-heating, HVAC and lighting through installation of low-flow fittings, good building insulation, and fluorescent or LED lighting, and also to install on-site renewable energy generating capacity (e.g. solar water heating).</p>	<p>M 5. Energy efficiency of buildings The campsite shall comply with the national legislation and local building codes related to energy efficiency and the energy performance of buildings M 6. Window insulation All windows in heated and/or air conditioned rooms and common areas shall have appropriate degree of thermal insulation according to the local regulations and climatic conditions and shall provide an appropriate degree of acoustic insulation. M 9. Energy efficient light bulbs M 11. Water flow from taps and showers The average water flow of the taps and shower heads excluding bath tub taps, kitchen taps and filling stations shall not exceed 9 litres/minute. O 31. Generation of electricity through renewable energy sources (up to 4 points) O 42. Automatic switching-off of air conditioning and heating systems (1,5 points)</p>
<p>4. To minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs.</p>	<p>O 57. Tap water temperature and flow (1 point) O 56. Washing machine water consumption (1 point) O 55. Dishwasher water consumption (1 point) O 54. WC flushing (1,5 points) O 53. Water flow from taps and shower heads (1,5 points)</p>
<p>5. To minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting water recycling services.</p>	<p>M 18. Waste separation by guests - Guests shall be informed how and where they can separate waste according to the best local or national systems within the areas to which the campsite belongs. Adequate containers for waste separation shall be as easily reachable as general waste bins. M 19. Waste separation - Waste shall be separated into the categories that can be handled separately by the local or national waste management facilities, with particular care regarding hazardous waste, which shall be separated, collected and disposed of as listed in Commission Decision 2000/532/EC (1) and appropriate disposal shall be sought. This list includes toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances as specified in Directive 2002/96/EC of</p>

Best Environmental Management Practice in the Tourism Sector (2013)	Current EU Ecolabel criteria for TAS/CSS
The most important actors and environmental aspects identified for the tourism sector.	Relevant EU Ecolabel criteria which consider hotspots identified in the BEMP report. Criteria is either mandatory (M) or optional (O).
	the European Parliament and of the Council (2) and Directive 2002/95/EC of the European Parliament and of the Council (3). M 15. Correct waste water disposal - The campsite shall inform guests and staff on the correct use of the waste water discharge, in order to avoid the disposal of substances that might prevent waste water treatment in accordance with the municipal waste water plan and Community regulations. Where a waste water plan from the Municipality is not available, the campsite shall provide a general list of substances that shall not be disposed of with the waste water according to the Groundwater Directive 2006/118/EC of the European Parliament and of the Council (1).
6. The installation of, or conversion of an existing pool to, a natural pool.	O 68. Swimming pools: Dosage of disinfectants (1 point) or natural/ecological swimming pools (1 point)

WORKING DRAFT IN PROGRESS

## ANNEX II COMPARISON OF TOURISM AND ACCOMMODATION ECOLABELS

Label	Energy criteria	Water criteria	Waste criteria	Detergents/Chemicals criteria	Other Services	General Management
<b>Nordic Swan</b>  <i>Includes mandatory criterion and points requirement for additional criterion – a set number of points needs to be achieved</i>	<p>Includes mandatory limit values for energy consumption, based on Nordic climate mapping</p> <p>Mandatory requirements include: timed or demand controlled outdoor lighting; times sauna units; all newly purchased lamps must be low energy</p> <p>Points are awarded for: Undertaking an energy analysis; presence-controlled (sensor) lighting; low energy lamps; use of standby function on television sets; low energy minibars; use of standby functions on office equipment; maintaining an optimum swimming pool temperature; heating the pool with renewable energy.</p>	<p>Includes mandatory limit values for all fresh water consumption</p> <p>Points are awarded for: use of water saving showers, taps and WCs; other water-saving actions; metering pool, whirlpool, hot spring water consumption separately.</p>	<p>Includes mandatory limit values for all unsorted waste</p> <p>Mandatory requirements include: no disposable items or individual portion packs shall be used for food service; sorting and correctly disposing of all hazardous waste; sorting all other waste into fractions stipulated by the municipality; offering guests a battery collection facility; composting garden waste</p> <p>Points are awarded for: No disposable items use in bathrooms/ guest rooms; waste sorting facilities for guests; using returnable packaging; composting organic waste</p>	<p>Includes mandatory limit values for use of chemical products</p> <p>Mandatory requirements include: use of ecolabelled dishwashing chemicals; a restriction on other detergent use; a % of laundry detergents and cleaning products must be used; not using chemical pesticides in outside areas; staff must have processes for chemical handling; ; a ban on refrigeration equipment containing CFCs refrigerants</p> <p>Points are awarded for: A limited use of dishwashing chemicals, dosage system for dishwashing chemicals; cleaning without chemicals; using environmentally friendly methods to clean any swimming pool</p>	<p>Mandatory requirements include: ensuring fixtures are fittings used in renovation (including newly purchased textiles) don't contain halogenated plastics or substances (e.g. PVC); 90% of tissue paper products should be Ecolabelled</p> <p>Points available for: re-use of printer toner cartridges; using ecolabelled printing matter (paper, brochures etc.), soap and shampoo, other consumables and durable goods and ecolabelled services (such as cleaning); rooms adapted for the physically disabled or allergy sufferers; provision of organic, Fairtrade, vegetarian, non-GMO or regional foodstuffs; using no vehicles or powering vehicles with renewable fuel; providing information about public transport, bicycles, horses and other environmentally friendly transport methods; Ecolabelled bed linen and towels.</p>	<p>Includes mandatory limit values for the use of chemical products</p> <p>Mandatory criteria include: 60% non-smoking rooms; a non-smoking dining area; ensuring the hotel has appointed relevant people, who are taking actions to reduce environmental impact; developing an environmental management plan; all employees must be aware of the Nordic Swan and guests must be informed that the hotel in Nordic Swan labelled and how they can help (e.g. switching off lights).</p> <p>Where conference facilities are available, extra points are available for: waste sorting; use of ecolabelled conference pads, flipcharts and pens; reusable drinking glasses; organically grown fruit.</p>
<b>Green Key</b>	Mandatory criteria include: registering energy use monthly; controlling heating and air conditioning systems;	Mandatory criteria include: total water consumption must be registered at least once a month; water use by toilets and urinals, taps and	Mandatory criteria include: proper management of hazardous waste; waste separation for staff and guests; limited used of	Mandatory criteria include: newly purchased chemical cleaning products will have Eco labels or restrict use of chemical substances; in		Mandatory criteria include: developing a documented environmental management system, including staff



Label	Energy criteria	Water criteria	Waste criteria	Detergents/Chemicals criteria	Other Services	General Management
	regularly maintaining energy using devices; having 50% energy efficient light bulbs; new refrigeration equipment must not use CFC or HCFC refrigerants; newly purchased mini-bars	showers are limited; wastewater must be treated; guests must be informed that towels and sheets will be changed on request  Points are awarded for: limiting water use further in all areas of the hotel; monitoring water usage;	disposable cups, plates and cutlery  Points are awarded for: not using single dose packaging; using biodegradable cups, plates and cutlery.	Europe, tissue paper should be made out of non-chlorine bleached paper  Points are awarded for: the use of fibre cloths for cleaning to save water and chemicals.		involvement; keeping guests informed about the Green Key award.
<b>Travelife sustainability criteria</b>	Mandatory criteria include: written environmental policy, environmental performance progress reports, planning procedure(s) in place for recent development(s) of up to 5 years, active engagement in meeting energy reduction targets.  Points awarded for: environmental forum membership, installation of effective low energy lighting, evidence of low energy equipment, consumption of renewable on-site.	A mandatory criterion is active engagement in reducing water consumption.  Points awarded for: installation of water saving devices, regular staff reminder to reduce water consumption, grey water treatment, environmental efficiency of irrigation systems	Mandatory criteria include: compliancy with waste water regulation and active engagement in reducing solid waste.  Points awarded for: efficient disposal of waste water, compliancy with waste regulations, recycling of waste, re-using waste, and composting waste, waste minimisation by buying in bulk	Mandatory criterion: active engagement in minimising use of chemical known to have health and environmental risks.  Points awarded for: use of environmental friendly cleaning materials, management plan for refrigeration equipment that utilises CFC/HCFC	Points awarded for charitable donations and/or outreach projects relating to nature conservation, environmental protection in the destination area,	Mandatory criteria include: a policy for treatment of staff is in place, including fair treatment, non-discriminatory employment, encouraging employment of and preservation of rights to local people; encouraging donation and engagement with local community, including through providing information to guests;  Points awarded for: staff training on above issues, business involvement/membership in associations, community forums, sustainable programmes

Label	Energy criteria	Water criteria	Waste criteria	Detergents/Chemicals criteria	Other Services	General Management
<p><b>Green Tourism Business Scheme (GTBS)</b></p> <p><i>Must adhere to minimum standards, and comply with optional standards based on a scoring system.</i></p>	<p>Minimum standard – minimising possible pollution from oil tanks and car parks, provide progress reports</p> <p>Scoring guidelines include: monitoring energy usage, use of energy efficient appliances, energy efficient lighting, efficient utilisation of heating and cooling, renewable energy consumption</p>	<p>Minimum standard– provide progress reports</p> <p>Scoring guidelines include: monitoring water consumption, installation of the following, showers that use less than 12 litres a minute; taps that use less than 8.5 litres a minute; self-closing taps; PIR urinal controllers; short flush system; water efficient washing machines; water efficient dishwashers; drip irrigation system; and chlorine free water treatments. To ensure re-use of water, install water butts, capture rainwater and grey water harvesting.</p>	<p>Minimum standard – suitable waste management, provide progress reports</p> <p>Scoring guidelines include: Monitoring waste consumption, use renewable and re-useable packaging, use less paper in marketing, bulk buying – dosing procedures, food portion monitoring, implement waste reduction measures, on-site composting, purchase re-chargeable batteries, re-use electrical equipment/appliances, recycle toner cartridges, use construction waste where possible and recycle, re-use, recover where possible</p>	<p>Minimum standard – proper chemical storage</p> <p>Scoring guidelines: environmentally safe soaps and detergents</p>	<p>Scoring guidelines include: monitoring of flora/fauna on site, Provide public transport information, offer travel incentives, reduce impact of staff transport, employ carbon management system</p>	<p>Scoring guidelines include: having a green management file, an established green action plan, educate staff on environmental awareness, have in place a green team, provide training for the green team, be involved in a green related social group/association, take environmental advice from an external body</p>
<p><b>Global sustainable tourism (GST) criteria</b></p> <p><i>All criteria must be applied to the greatest extent, unless a criterion is not applicable, supported with sound reasoning.</i></p>	<p>Energy consumption is measured, monitored and reduced where possible. Renewable energy consumption is encouraged.</p>	<p>Water consumption is measured, monitored and reduced where possible. Sustainable water sourcing is encouraged.</p>	<p>Waste is measured, monitored and reduced where possible. Encourage recycling and re-use. Waste water including grey water must be treated and re-used safely.</p>	<p>Minimisation of harmful chemicals and purchase environmentally friendly substitutes. Proper management of storage, use, handling, and disposal of chemicals.</p>	<p>The organisation must encourage customers and staff to reduce carbon emissions through transport related pollution, and promote sustainable transport. Must implement practices to reduce pollution from noise, light, runoff, erosion, toxic compounds, and air, water and soil contaminants.</p>	<p>Guests are given information about local areas, including conservation, appropriate behaviour and sites of cultural significance; measures need to be taken to conserve local biodiversity;</p> <p>Other criteria include: working EMS, compliancy with regulations, environmental training for staff, sustainable marketing/promotion, customer satisfaction and building efficiency e.g. low energy devices, renovation,</p>

Label	Energy criteria	Water criteria	Waste criteria	Detergents/Chemicals criteria	Other Services	General Management
						retrofit.
<b>Ecolabel Malta</b>  <b>Mandatory criteria – 100% compliancy (51 out of 51)</b>  <b>Voluntary Compliancy – minimum 50% (19 out of 38)</b>	<p>Mandatory criteria include: management have received EMS training, there is designated staff for environmental responsibilities, regular environmental training for staff, active environmental initiatives (at least annually) and compliancy with regulations, monitoring air con rooms for leakages, installation of low energy devices e.g. lighting timers.</p> <p>Voluntary criterion: additional low energy measures e.g. power factor correction, voltage optimisation, and heating, public toilet flush/toilets.</p>	<p>Mandatory criteria include: preventative maintenance programme in place for water system; rainwater harvesting; water saving devices in showers, on taps and water cisterns.</p> <p>Guests are given option to reuse towels and bed sheets.</p> <p>Effective and automatic irrigation system to save water and daily monitoring (twice)</p> <p>Voluntary criteria: wash basins fitted with automatic controls, as are showers.</p> <p>Grey water treatment system.</p>	<p>Mandatory criteria include: measuring, monitoring and reducing waste where possible. Have implemented a waste separation and management system, to allow for recycling, re-use, disposal, minimisation of use of disposed and consumable goods.</p> <p>Voluntary criteria include: minimising paper usage, textile waste recycling, have a well maintained garbage room and waste compactor for recycling, hotel producing own compost,</p>	<p>Mandatory criteria include: a licensed waste contractor to dispose of hazardous waste.</p> <p>Reducing, replacing or eliminating corrosive products, phosphate, bleaching detergents, pesticides and other harmful substances.</p> <p>Hotel is using bio-cleaning products; CFC products are replaced with ecological ones.</p> <p>Suitable storage for chemicals, records kept for chemical use in pest control.</p>	<p>Mandatory criteria include: purchasing policy for ecologically sustainable goods e.g. local produce</p> <p>Voluntary criteria: recycled or ecological paper used for mailing, other office use, toilet rolls, &amp; hand towels in public toilets, and use of recycled toners for in-house printing.</p>	<p>Mandatory criteria include: implement practices to offset GHG emissions and practices put in place to reduce noise, light pollution, water run-off &amp; erosion.</p>
<b>Green Globe</b>	Energy consumption measures, sources identified and energy reduction goals	Water consumption measured, monitored and reduced where necessary by installing water saving devices	Waste water treated including grey water and re-used where possible. Recycling, re-using, recovering and composting as much as possible and reducing disposal of solid waste via landfill/incineration	Harmful substances including pesticides, paints, swimming pool disinfectants, and cleaning materials must be reduced, eliminated, or replaced (for sustainable products)	<p>Purchase consumables from local sources where possible.</p> <p>Must implement practices to reduce pollution from noise, light, runoff, erosion, toxic compounds, and air, water and soil contaminants.</p>	Have EMS in place, legal compliancy, employee training, customer satisfaction, promotional materials of sustainability, sustainable construction of buildings.
<b>Green Seal</b>  *in addition to compliancy with previous	<b>For bronze rating:</b> energy efficient equipment, energy efficient lighting, equipment preventative maintenance	<b>For bronze rating:</b> as a minimum, properties must have installed the following fixtures or retrofits with: 2.2gpm	<b>For bronze approval rating:</b> Minimising waste through efficient waste management i.e. implementing measures	<b>For bronze rating:</b> use of non-toxic, non-phosphate, bio-degradable detergents and cleaning materials.		

Label	Energy criteria	Water criteria	Waste criteria	Detergents/Chemicals criteria	Other Services	General Management
<b>standards</b>	<p><b>For silver rating*:</b> energy efficient windows, sensor timers lighting</p> <p><b>For Gold rating*:</b> have set out large goals in energy reduction or, the property is an ENERGY STAR Leader</p>	<p>faucets and aerators; 1.6 gpf toilets; 2.5gpm showerheads. Efficient water usage outside property i.e. reliant on natural water availability, limited irrigation to grasses for public use.</p> <p><b>For silver rating*:</b> sidewalks, car parks and drives must be swept rather than washed down by potable water</p>	<p>such as double sided printing/coping of paper, bulk purchasing to avoid single use products.</p> <p>Have an established recycling plan in place, including re-use where possible</p> <p><b>For silver rating*:</b> Food donation of leftover to local community support network, minimise the use of disposable food service items e.g. cutlery, plates, etc.</p> <p>Composting of food and yard waste.</p> <p>Recycle, donation or reuse used amenities e.g. shampoo bottles</p> <p><b>For gold rating*:</b> hotels do not dispose of or incinerate 90% of its solid or water by-products, from reuse, recycling and composting.</p>	<p>Suitable storage of chemicals and air filtration/ventilation in the room.</p> <p><b>For silver rating*:</b> chlorinated chemicals used only when there is no less toxic alternative, and only in minimal amounts.</p>		
<b>Das Österreichische Umweltzeichen (Austrian Ecolabel)</b>	<p>Criteria include: Regular data collection of energy used; energy survey or performance certificate; roof and loft insulation should be installed; adequate thermal insulation; ensure proper boiler maintenance and insulation; requirements for heat generation efficiency; efficient heating</p>	<p>Criteria include: Regular data collection of water used guests must be informed that towels and sheets will be changed on request; water saving WCs, urinals, taps and showers should be installed; wastewater should be treated;</p>	<p>Criteria include: Regular data collection of waste produced; a written waste management plan must be in place; waste (including hazardous waste) must be separated; waste separation facilities should be available to guests; waste bins should be in toilets; restriction on sales of beverages in cans;</p>	<p>Criteria include: Regular data collection of amounts of chemicals used; door mats (or similar dirt traps) must be put at all entrances; a proportion of cleaning products must be Type -1 Ecolabelled; disinfectants should only be used where legally required; mechanical pipe and drain cleaning should</p>	<p>Criteria include: Offering of organic, or other certified foodstuffs; using elements of local art, cultural heritage etc. in design or in shops; arranging eco-friendly excursions for guests; preventing soil contamination when storing liquid fuels; office paper and conference paper</p>	<p>Criteria include: developing a sustainability management plan; ensuring equal employment opportunities; training staff in environmental practices; ensuring guests are aware of the label, measures the hotel is taking and appropriate other information (e.g. switching off lights); collecting guest</p>

Label	Energy criteria	Water criteria	Waste criteria	Detergents/Chemicals criteria	Other Services	General Management
	<p>and air conditioning equipment; limiting use of coals and heavy oils; energy efficient lighting; outdoor heaters are only allowed in specific circumstances ; electricity from renewable sources encouraged; use of swimming pool cover; for conference rooms, 30% of equipment (e.g. projectors) must be energy star or type-1 ecolabelled; self-service areas must not have 'open front coolers';</p>		<p>returnable and reusable drinks containers should be used; restrictions on single dose food products; no disposable cups or plates;</p>	<p>be used instead of chemical; toilet and urinal 'blocks' e.g. rim blocks) must not be used; no automatic detergent dosing for WCs and urinals; no pesticides (unless for regulatory requirements);</p>	<p>must be Ecolabelled (type 1); no disposable products (i.e. non-refillable toiletries) shall be provided in guests rooms – unless required by regulations; new buildings but be in accordance with legal requirements and should not impact local communities or biodiversity; rooms adapted for physically disabled; free range eggs; local, organic, vegetarian food should be supplied; optional – a nutritionist, dietician offers advice on the menu; consider animal welfare in food provision; no GMO food; regional dishes and seasonal food is available; food is freshly prepared; no food additives; tap water is provided with meals; menus should indicate where food originates from; 'green catering' should be available; info on public transport and environmentally friendly travel is available to guests; native plants should be used; contribute to biodiversity protection</p>	<p>satisfaction and feedback; no smoking in common areas ; take measures to reduce/avoid noise pollution;</p>

## ANNEX III POINTS ALLOCATION FOR CURRENT AND UPDATED CRITERIA

Criterion Reference	Criterion Description	CURRENT	UPDATED	
Energy	31	renewable electricity generation	4	4
	32	energy from renewable sources	2	2
	33	boiler energy efficiency	1.5	1.5
	34	boiler NOx	1.5	1.5
	35	district heating	1.5	1.5
	36	cogeneration	1.5	1.5
	37	heat pump	2	0 (removed)
	38	heat recovery	1.5	1.5
	39	thermoregulation	1.5	1.5
	40	energy performance audit	1.5	1.5
	41	air conditioning energy efficiency	2	2
	42	auto switch off air conditioning	1.5	1.5
	43	bioclimatic architecture	3	0 (removed)
	44	energy efficient equipment	3	3
	45	hand driers with sensors	2	1
	46	refrigerator positioning	1	1
	47	auto switch off lights	1.5	1.5
	48	sauna timer control	1	1
	49	swimming pool heating with renewables	1.5	1.5
	50	auto switch off outside lights	1.5	1.5
<b>Total energy</b>		<b>36.5</b>	<b>30.5</b>	
Water	51	use of rainwater & water recycling	4	3
	52	auto watering system	1.5	1.5
	53	water flow from taps and showerheads	1.5	1.5
	54	WC flushing	1.5	1.5
	55	dishwasher water consumption	1	1
	56	washing machine water consumption	1	1
	57	tap water temperature and flow	1	1
	58	shower timers	1.5	1.5
	59	swimming pool cover	1	1
	60	de-icing	1.5	1.5
	61	indication on water hardness	2	2
	62	water saving urinals	1.5	1.5
	63	indigenous species outdoor planting	1	1
	<b>Total water</b>		<b>20</b>	<b>19</b>
Detergents and disinfectants	64	detergents	3	3
	65	paints and varnishes	2	2*
	66	car washing in special areas (campsite only)	1	1
	67	alternative BBQ lighters	1	1
	68	swimming pool dosage and natural pools	1	1
	69	mechanical cleaning	1	1
	70	organic gardening	2	2

Criterion Reference	Criterion Description	CURRENT	UPDATED	
	71	pest repellents	2	2
	Total detergents and disinfectants		13	13
Waste	72	composting	2	2
	73	disposable drinks containers	2	0 (removed)
	74	fat/oil disposal	2	0 (removed)
	75	run-off from car parks (campsite only)	1	1
	76	used textiles, furniture etc	3	3
	Total waste		10	6
	Other services	77	regulation of campsite traffic (campsite only)	1
78		campsite generated traffic (campsite only)	1	1
79		trolleys for guests (campsite only)	1	1
80		unsealed surfaces (campsite only)	1	1
81		roof landscaping	2	2
82		environmental education	3	3
83		no smoking	1.5	1.5*
84		bicycles	1.5	1.5
85		pick up service	1	1
86		refillable bottles	3	3
87		use of rechargeable products	2	3
88		paper products	3	3
89		durable goods	3	3
90		local food products	3	3
91		organic food	3	3
92	indoor air quality	4	4	
Total other services		34	35	
General Management	93	EMAS or ISO registration	3	3
	94	suppliers EMAS or ISO registered	1.5	1.5
	95	subcontractors comply with mandatory criteria	4	4.5
	96	energy and water meters	2	2
	97	additional environmental actions	3	3
	Total general management		13.5	14
New Criterion	Swimming pool backwashing	n/a	2	
Total Campsite		127	119.5	
Total Tourist Accommodation		121	113.5	

As the Commission's in-house science service, the Joint Research Centre's mission is to provide EU policies with independent, evidence-based scientific and technical support throughout the whole policy cycle.

Working in close cooperation with policy Directorates-General, the JRC addresses key societal challenges while stimulating innovation through developing new standards, methods and tools, and sharing and transferring its know-how to the Member States and international community.

Key policy areas include: environment and climate change; energy and transport; agriculture and food security; health and consumer protection; information society and digital agenda; safety and security including nuclear; all supported through a cross-cutting and multi-disciplinary approach.

WORKING DRAFT IN PROGRESS