

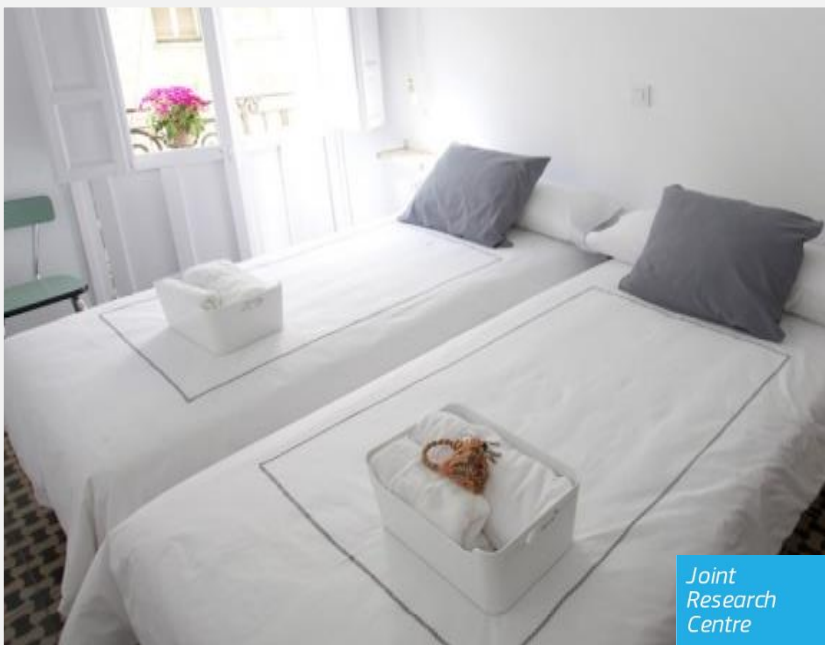
JRC SCIENCE FOR POLICY REPORT

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

Final criteria proposal

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June 2016



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JRC103177

EUR 28127 EN

PDF ISBN 978-92-79-62211-3 ISSN 1831-9424 doi:10.2791/30096

Luxembourg: Publications Office of the European Union, 2016

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How to cite: C. Vidal-Abarca, R. Rodríguez, O. Wolf, K. Bojczuk, T. Castella, J. Tewson; Revision of European Ecolabel Criteria for Tourist Accommodation and Camp Site Services. Final criteria proposal; EUR 28127 EN ; doi:10.2791/30096

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Revision of European Ecolabel Criteria for Tourist Accommodation and Camp Site Services. Final criteria proposal.

Abstract

This technical report is aimed at providing a sound base to the revision process of the EU Ecolabel criteria for Tourist Accommodation (2009/578/EC) and Camp Site Services (2009/564/EC).

The main purpose of this document is to evaluate the current criteria and discuss if the criteria are still relevant or should be revised. This document was developed to undergo the stakeholder consultation, which is crucial to come up with criteria adapted to the market reality while being able to select the best environmental performance products available on the market.

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1 Introduction

Two existing EU Ecolabel criteria (2009/578/EC & 2009/564/EC: Commission Decisions of 9 July 2009 respectively) relating to tourism services: tourist accommodation services (TAS) and camp site services (CSS) are being revised. This document is intended to provide the background information for the revision of the EU Ecolabel criteria for both services. The study has been carried out by the Joint Research Centre's Institute for Prospective Technological Studies (JRC-IPTS) with technical support from Oakdene Hollins. The work is being developed for the European Commission's Directorate General for the Environment.

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

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

In addition this document is also complemented by the first, second, third and fourth versions of this technical report (TR1.0, TR2.0, TR3.0 and TR4.0) that were released in August 2014, April 2015, November 2015 and May 2016 respectively, including the first, second and third criteria proposals, as well as the feedback from the stakeholders of the project and further research carried out by this group of authors. The first draft version of the technical report (TR1.0) has built the basis for the first Ad-Hoc Working Group (AHWG) meeting taken place in October 2014. The second draft version of the technical report (TR2.0) was the basis of the discussions held during the second AHWG meeting placed in May 2015 in Brussels. The discussions held in both AHWG meetings are publicly available. The technical report (TR3.0) provides an update of the criteria development process based on new information (stakeholder's discussion at the 2nd AHWG meeting, further stakeholder inputs following the meeting, views and suggestions arising from stakeholders follow up and further desk research). The TR4.0 report provides an update of the criteria development process based on new information (stakeholder's discussion at the EUEB meeting January 2016), further stakeholder inputs (open consultation October-February 2016).

Moreover, during the course of the revision process, in order to obtain feedback on the current EU Ecolabel criteria for TAS and CSS, a questionnaire was sent to stakeholders including tourist accommodation and camp site service providers, tour operators and agents, Competent Bodies, tourism or travel/trade associations and government bodies.. The specific information, views and suggestions arising from questions were reflected in the preliminary report and taken into consideration as far as possible in the proposals for the criteria revision. The above mentioned outputs are available at: http://susproc.jrc.ec.europa.eu/tourist_accommodation/stakeholders.html.

The **final technical report** consist on the final criteria and a summary of the rationale along the revision process including the final input during the Inter Service Consultation (April 2016) and final EUEB meeting (June 2016). The report consists of:

- **Introduction:** this section describes the goal and content of the document, the sources of information and the coming steps in the project. This section aims at being a link between the information and deliverables already published and the new draft of the criteria. Among the different sources of information listed and summarized in this section especial attention should be paid for the key environmental aspects of this product group and the criteria proposals.

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

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- At the end of this section, a summary of the main changes introduced during the revision and the proposed structure of the criteria is included. In addition a text highlighting the synergies between EU Ecolabel and Eco-Management Audit Scheme (EMAS) has been included.
 - **Assessment and verification:** this section includes information on the type of documentation required to show compliance with the criteria that shall be provided by applicants and recognised by Competent Bodies. In addition, the legal pre-requisites that applicant shall guarantee are also mentioned under this section.
 - **Criteria proposal:** this section presents the last and most updated EU Ecolabel criteria proposals for the product group "Tourist Accommodation". The proposal is written in a blue box and subsequently a brief rationale is given. Rationale is based on the most relevant aspects found out along the project.
 - **Impact of changes to criteria:** this section consist on a summary of the main changes on the structure and scoring rules of the revised criteria. In addition an indicative assessment of the level of ambition of the revised criteria and potential impacts on current licence holders and applicants is included under this section.
 - **Table of comments:** this section consists of all the comments and feedback reported by the stakeholders from the TR3.0 publication (October 2015) up to today in an anonymous way. The section is completed by the assessment of the stakeholder's feedback, further research on the points highlighted by the participants and how they triggered the changes on the criteria leading to the current criteria proposal.

Comments were classified under three categories:

- a) *Accepted:* the comment is fully integrated in the new criterion wording
 - b) *Partially accepted:* this category includes those comments that either point out at a good idea that is integrated in the new criterion wording or suggest some modifications of the criteria wording and that even if they are not literally introduced, they are partially introduced.
 - c) *Rejected:* the comment is not on board in the proposal. This fact can be due to different reasons such as lack of standards to perform the measurement, creation of market restrictions if the idea is integrated, etc
- **Annex I** includes the existing EU Ecolabel criteria for Tourist Accommodation/Campsite in order to allow the reader to consult current text within this document

1.1 Methodology and sources of information

The current EU Ecolabel definition of TAS and CSS was assessed against a number of sources to determine its suitability. This included an analysis of alternative eco-labels for tourist accommodation (e.g. Nordic Swan, Malta Eco certification, Green Key, Travelife sustainability criteria, Global Sustainable Tourism Criteria) and other definitions from sources such as EU datasets.

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

The revision of the EU Ecolabel should be based on scientific evidence and should focus on the most significant environmental impacts during the whole life cycle of products. To determine whether the EU Ecolabel covers the most significant impacts for tourist accommodation, a number of sources were considered including: a number of relevant LCAs,

a recent report by the JRC IPTS on Best Environmental Management Practice in the Tourism Sector [JRC IPTS (2013)]; the Sectoral Reference Document (SRD) on Best Environmental Management Practice in the Tourism Sector [JRC IPTS (2016)] and several alternative eco-labels (e.g. The Nordic Swan, The Austrian Ecolabel (Das Österreichische Umweltzeichen), Green Key...).

A review of available Life Cycle Assessment (LCA) studies for tourism services has been undertaken with the aim to identify the main environmental areas of concern and life cycle hot-spots for tourist accommodation. In addition, to cover a larger range of the environmental aspects related to the Tourist Accommodation services it was considered relevant to use, besides LCA methodologies, other sources as the Best Environmental Management Practice report in the Tourism Sector [JRC IPTS (2013)]. The Best Environmental Management Practice report in the Tourism Sector [JRC IPTS (2013)] represents the scientific and technical basis of the Sectoral Reference Document (SRD) on Best Environmental Management Practice in the Tourism Sector [JRC IPTS (2016)] which has been developed according to the Eco-Management and Audit Scheme (EMAS) regulation. From now on in this document, the 'report on Best Environmental Management Practice in the tourism sector' [JRC IPTS, (2013)] will be referred as *EMAS BEMP report*. In particular, the EMAS BEMP report identifies the potential savings on water consumption related to the accommodation sector. This allows covering water consumption aspects that are not specifically tackled by the LCA methodology and thus not considered in the LCA review made. This is because the LCA method presents some shortcomings to robustly address the impacts associated with the effects of water consumption by products/services.

Finally, the revision of the EU Ecolabel criteria largely considers the specific information provided by the stakeholders during the two AHWG meetings and emails/phone calls. The information related to the revision of the EU Ecolabel criteria is summarized in the series of TRs while the information described above is mainly included in the preliminary report.

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

The Preliminary Report forms the initial stage of revising the criteria for the product groups TAS and CSS. This includes the updating and revision of the scope and definitions of the current criteria, an analysis of the tourist accommodation market and the implications for the EU Ecolabel, and a review of the scientific evidence to identify the main environmental impacts of TAS and CSS. The sections below provide a summary of the findings from the Preliminary Report. Further details can be found at *Revision of European Ecolabel Criteria for Tourist Accommodation and Campsite Services - Preliminary Report* (July 2014)¹.

1.2.1 Product group name, scope and definitions

Product group name:

tourist accommodation

Revised scope and definition (extract of the revised preamble published along with this document):

1. The product group 'tourist accommodation' shall comprise the provision of

tourist accommodation services and campsite services and any of the following auxiliary services under the management of the tourist accommodation provider:

- (1) food services;
- (2) leisure or fitness facilities;
- (3) green areas;
- (4) premises for singular events such as business conferences, meetings or training events;
- (5) sanitary facilities, washing and cooking facilities or information facilities available to campsite tourists, travellers and lodgers for collective use.

2. Transportation services and pleasure voyages are excluded from the product group “tourist accommodation”.

Article 2

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

- (1) ‘tourist accommodation services’ means the provision, for a fee, of sheltered overnight accommodation in rooms, including at least a bed, and of private or shared sanitary facilities, offered to tourists, travellers and lodgers;
- (2) ‘campsite services’ means the provision, for a fee, of pitches equipped for any of the following structures: tents, caravans, mobile homes, camper vans, bungalows and apartments, and of private or shared sanitary facilities, offered to tourists, travellers and lodgers;
- (3) ‘food services’ means the provision of breakfast or other meals;
- (4) ‘leisure or fitness facilities’ means saunas, swimming pools, sport facilities and wellness centre accessible to guests or non-residents or both;
- (5) ‘green areas’ means parks, gardens or other outside areas which are open to tourists, travellers and lodgers.

Rationale of proposed name, scope and proposed definitions

- There are clear synergies between the current sets of EU Ecolabel criteria for TAS and CSS, and so it is feasible to develop the product group “tourist accommodation” to cover both accommodation types. The stakeholder questionnaire and feedback received during the revision process revealed an overall support for merging TAS and CSS into a common set of criteria, titled “tourist accommodation”. However, separate definitions for tourist accommodation and campsites should be maintained to account for any technical differences between the two which would result in dissimilar criteria. It is suggested that the current scope of the criteria be modified to consider merging TAS and CSS, although separate definitions should still be maintained for each.
- The existing EU Ecolabel definition of TAS and CSS was assessed against a number of sources to determine its suitability. Although there are a number of alternative labels for

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

- The stakeholder questionnaire asked for feedback on the current EU Ecolabel definitions. Several respondents noted that conference rooms/training rooms (i.e. the provision of a room for an event such as a meeting or conference) should be included in this list, where this service is incidental to the provision of accommodation. It is suggested that the current scope of the criteria be extended to consider adding ‘conference facilities’ to the list of services provided.
- In the final text version, changes in the wording and the structure of the text have been introduced as suggested by the legal service of the commission during the interservice consultation. In addition it has been introduced a text to exclude transportation and/or as pleasure voyages as requested by a stakeholder.

1.2.2 Key environmental aspects and relation with the criteria proposal

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

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

Camillo De C. et al (2010a):

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

the hall, but also in the hotel rooms), selection of suppliers with a better environmental performance and provision of more environmentally-sound food for breakfast.

Beatriz Roselló-Batle et al. (2009):

- This study considered three to four phases of tourist accommodation, and revealed that the operating phase is responsible for the greatest environmental impacts of the whole building.
- Concerning energy use, near to 78% of the total energy use during an assumed lifetime of 50 years, comes from the operation phase. It is during this phase where it is possible to achieve the biggest reductions in energy use.
- A 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.
- Finally, concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total. The introduction of domestic solid waste composting would contribute to a reduction in quantity of waste produced in this hotel. It is a simple activity and the necessary investment is low.

Castellani V. and Sala S. (2012):

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

Filimonau V. et al. (2011):

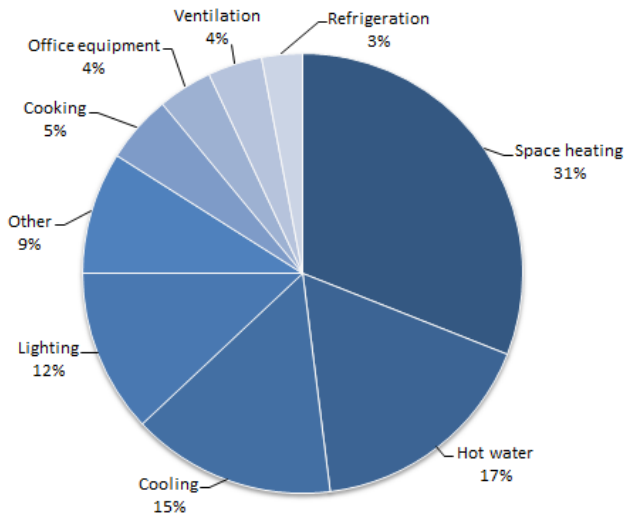
- The results of this study show that electricity consumption represents the largest energy demand and source of GHG emissions in both of the hotels analysed.
- The study also suggests that catering and laundry services might become a significant contribution to the overall energy consumption and consequent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

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

Energy consumption

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

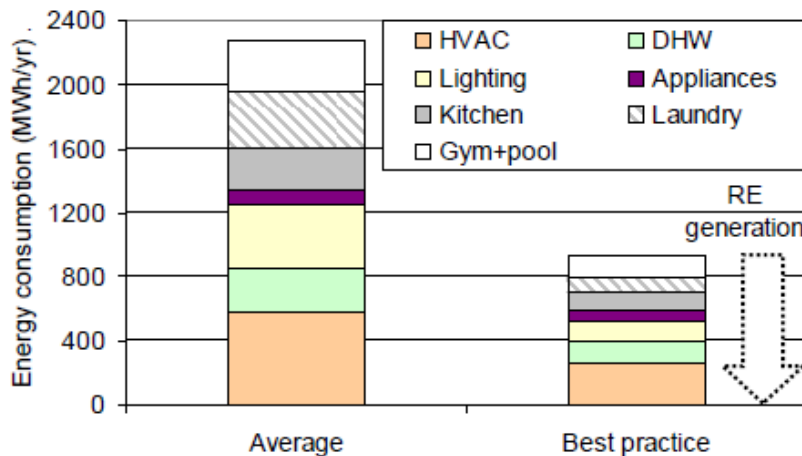
Figure 1: Energy consumption by end-use in hotels



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

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

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



NB: assumes average occupancy rate of 80% of rooms (of which 25% double occupancy).

Source: JRC IPTS (2013) Reference Document on Best Environmental Management Practice in the Tourism Sector

To achieve these energy reductions, a number of best environmental management practices (BEMPs) can be implemented:

- Monitoring and measurement of energy use (including sub-metering, inspection and maintenance, staff and guest training, adequate insulation, automated control, energy management plans) can be effective in understanding where energy use can be minimised.
- Buildings should either be built, or retrofitted, to minimise heating and cooling energy requirements.
- HVAC energy consumption can be minimised by installing zoned temperature controls and by ensuring all equipment meets energy efficiency requirements.

- Efficient applications of heat pumps and geothermal heating/cooling. BEMP is to install efficient (e.g. ecolabelled) heat pumps for heating and cooling, or, where possible, groundwater cooling.
- Energy efficient lighting (including a control system for this) should be installed.
- Renewable energy sources. BEMP is to install on-site geothermal, solar or wind energy generation equipment where appropriate, and to procure electricity from a genuine (i.e. verifiably additional) renewable electricity supplier.

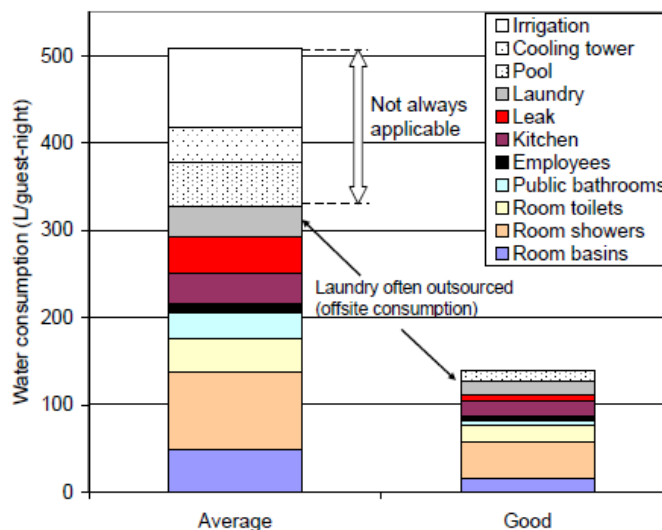
Once these measures to reduce energy demand have been implemented, further reductions in the use of primary energy can be made by increasing the supply of renewable energy; in particular, installing onsite systems such as geothermal, solar or wind.

Water consumption

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

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

Table 1: Modelled specific water consumption per guest-night in a 120 bed hotel implementing average and good management across water using processes



NB: This figure assumes 80% room occupancy (20% double occupancy). Based on average and good performance data presented in JRC IPTS (2013).

Source: JRC IPTS (2013), Reference Document on Best Environmental Management Practice in the Tourism Sector

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

- Water system monitoring, maintenance and optimisation. Maintenance of water-using devices is important – this can prevent or detect any leaks. Monitoring water use through meters (and, where possible, sub-meters) can help tourist accommodation sites better manage and find areas to reduce water use.
- Installation of efficient water fittings (for example those which have been EU Ecolabelled or awarded other Type-I environment labels) is beneficial. This may

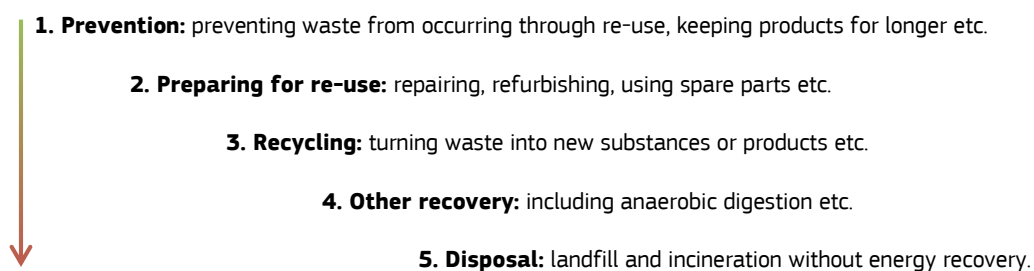
include, for example, low flow toilets, sensors to regulate the use of water, or timers to restrict unnecessary water use.

- Efficient housekeeping operations, such as implementation of a bedclothes and towel re-use scheme or employing water saving cleaning methods (such as turning off taps when cleaning or only flushing toilets as required) can reduce water usage. Best practice is also to train staff on the implementation of water- and chemical-efficient cleaning methods, and to procure environmentally certified consumables for bedrooms and bathrooms.
- Optimised large-scale or outsourced laundry operations. BEMP is to select an efficient laundry service provider that is certified by an ISO Type I ecolabel or that complies with criteria in such labels, or to ensure that on-site large-scale laundry operations comply with such criteria.
- Optimised pool management. BEMP is to optimise the frequency and timing of backwashing based on the pressure drop rather than fixed schedules, to use ozonation or UV treatment and careful dosing control to minimise chlorination, and to recover heat from exhaust ventilation air.
- The laundry process should be optimised to minimise the number of washes - green procurement of efficient washing machines can help to reduce both water and energy use.
- Rainwater and grey water recycling. The use of grey water or recycled water should be encouraged
- Irrigation should be optimised. This may include planting only indigenous species, or watering plants at the best time of day to minimise evaporation losses.

Waste generation and wastewater management

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

Figure 3: Waste hierarchy



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

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

The BEMPs can help to address both environmental issues:

- Waste sorting and sending for recycling. BEMP is to provide separated waste collection facilities throughout the establishment, to ensure that there is a clear procedure for waste separation, and to contract relevant recycling services at least for glass, paper and cardboard, plastics, metals and organic waste.
- Waste water treatment where there is not access to centralized waste water treatment. BEMP is to install an on-site waste water treatment system that treats

waste water at least to secondary, and preferably to tertiary, level, and includes at least pretreatment to screen solids and settle particulate matter followed by efficient biological treatment (e.g. in a sequencing batch reactor) to remove a high proportion of COD, BOD, nitrogen and phosphorus from the final effluent. Sludge is treated and disposed of in an environmentally acceptable manner.

- A waste survey or inventory could be developed to help understand where waste is produced, and how it can be reduced.
- Procurers can reduce waste in a number of ways: efficient ordering and storage can reduce the need to throw away unused or spoiled products; where possible, packaging to be returned for re-use; and products with less packaging can be selected.
- The housekeeping function can help to reduce waste by replacing individually wrapped soaps and shampoos with bulk items, or dispensers. The use of liners in bins should also be avoided, or these should be re-used.
- Any caterers on site should only use re-usable glasses, plates and cutlery. Single-use products should also be avoided and food cooked to order where possible.
- At the reception, documents should only be printed when necessary.

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

Best environmental management practices for separating and recycling waste include:

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

Other areas

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

Restaurants and hotel kitchens

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

- Green sourcing of food and drink products. BEMP is to assess food and drink supply chains to identify environmental hotspots and key control points, including editing of menus to avoid particularly damaging ingredients (e.g. endangered fish species and some out-of-season fruit), and selection of environmentally certified products.
- Organic waste management. BEMP is to minimise avoidable food waste by careful menu development and portion sizing, and to ensure that all organic waste is separated and sent for anaerobic digestion where available, or alternatively incineration with energy recovery or local/on-site composting.
- Optimised dishwashing, cleaning and food preparation. BEMP is to select efficient washing equipment, including trigger-operated low-flow pre-rinse spray valves, efficient dishwashers and connectionless steamers, and to monitor and benchmark water consumption in kitchen/restaurant areas.
- Optimised cooking, ventilation and refrigeration. BEMP is to select efficient cooking equipment, including induction-hob or pot-sensor-controlled gas ovens, efficient

refrigeration equipment that uses natural refrigerants such as ammonia or carbon dioxide, and to control ventilation according to demand.

Campsites

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

BEMPs for campsites includes:

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

EMAS BEMP report differentiates campsite services of other accommodation services assuming that catering, laundry services and swimming pools are not as widely available in campsite. However fundamental criteria related to energy water and waste are also relevant to campsite services. Additionally, campsites range from basic camping grounds comprising simply of pitches where guests can pitch their tents, to large campsites offering a wide range of amenities and services including restaurants and swimming pools. Therefore, it is proposed to keep the current structure of criteria horizontal for both services. This configuration (mandatory-optional criteria) is flexible to allow campsites presenting food services or hotels with green areas management to comply with relevant criteria.

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

- Minimising the use of chemicals (e.g. laundry, dishwashers, de-icing, disinfectants, pools...)

-
- Green procurement of products such as detergents:, specific mention is made to the benefits related to the use of ISO Type I Ecolabelled products:
 - reduced human toxicity and ecotoxicity,
 - reduced eutrophication and oxygen demand in receiving waters,
 - reduced air pollution
 - reduced resource depletion and waste generation.
 - Benchmark: 80 % of purchases being Ecolabelled.

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

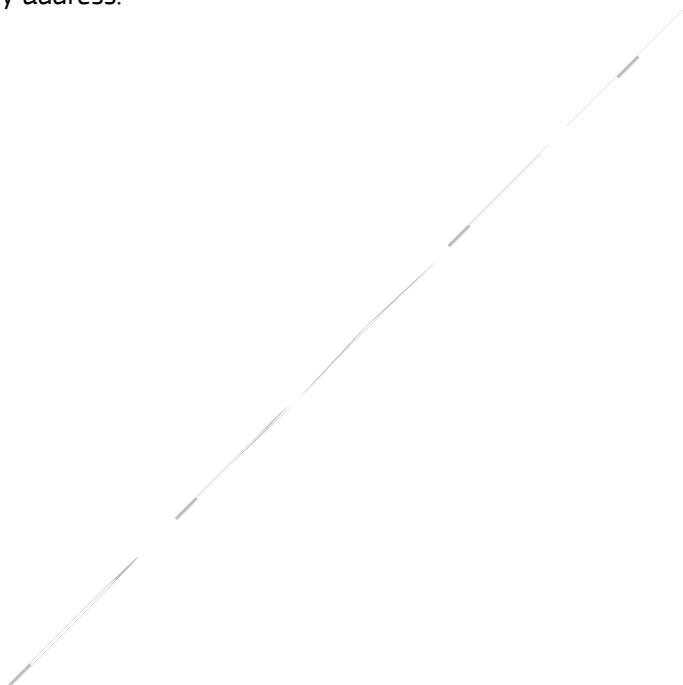


Table 2. Link between the hotspots identified (EMAS BEMP report and LCA) and the revised final EU Ecolabel criteria. Criteria is either mandatory (M) or optional (O).

Section	Final revised criteria	Existing criteria	Environmental hotspot
General management	Environmental management systems and certification of service and suppliers		
	M1. Basis of an Environmental Management System	M25. Policy setting and environmental program	General (energy, water, waste, chemical use, procurement) <u>EMAS BEMP report</u> encourages the implementation of an environmental management system as is encouraged through this revised criterion
	Criterion 23 - EMAS registration, ISO certification of the tourist accommodation (up to 5 points)	O93. EMAS or ISO registration of the tourist accommodation (up to 3)	General (energy, water, waste, chemical use, procurement) <u>EMAS BEMP report</u> encourages the implementation of an environmental management system as is encouraged through this revised criterion
	Criterion 24 - EMAS registration or ISO certification of suppliers (up to 5 points)	O94. Suppliers EMAS or ISO registered (up to 1.5)	General (energy, water, waste, chemical use, procurement) <u>EMAS BEMP report</u> encourages the implementation of an environmental management system as is encouraged through this revised criterion
	Criterion 25 - Ecolabelled services (up to 4 points)	O95. Subcontractors comply with mandatory criteria (up to 4 points)	General (energy, water, waste, chemical use, procurement) <u>EMAS BEMP report</u> benchmark of excellence proposes all outsourced laundry to be carried out by a provider who has been awarded an ISO Type I ecolabel (e.g. Nordic Swan), and all in-house large-scale laundry operations, This is in line with the revised EU Ecolabel criteria.
	Training and information		
M2. Staff training	M26. Staff training M17. Disinfectants	General (energy, water, waste, chemical use, procurement, transport) <u>EMAS BEMP report</u> recommends that sustainability issues are included in basic training for all levels of staff, to highlight the importance of ensure waste reduction and water, and energy minimisation. This is in line with the revised EU Ecolabel criteria.	

Section	Final revised criteria	Existing criteria	Environmental hotspot
	M3. Information to guests	M27. Information to guests M15. Correct waste water disposal	General (energy, water, waste, transport) <u>EMAS BEMP report</u> suggests that guests should be provided with “interactive on-site education of environmental issues, including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles)”. This is in line with the revised EU Ecolabel criteria. This criterion primarily focuses on providing information about the environmental objectives of the tourist accommodation.
	O26 - Environmental and social communication and education (up to 2 points)	O82. Environmental communication and education (up to 3 points)	General (energy, water, waste, biodiversity) <u>EMAS BEMP report</u> : BEMP is to “provide guests with interactive on-site education of environmental issues, including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles)”. This is in line with the current <u>EU Ecolabel</u> criterion for environmental communication and education. This is in line with the revised EU Ecolabel criteria.
Monitoring and maintenance			
	M4. General maintenance	M24. Maintenance and servicing of boilers and air conditioning systems	General (energy, water) <u>EMAS BEMP report</u> and <u>LCA</u> are to “ensure that all equipment is maintained through appropriate periodic inspection”. This still reflects the previous criterion for TAS and CSS, and as such is still applicable.
	M5. Consumption monitoring	M28. Energy and water consumption data M29. Other data collection	General (energy, water) <u>EMAS BEMP report</u> includes: “Undertake an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficient improvement options, and to ensure that all equipment is maintained through appropriate periodic inspection. In addition, <u>EMAS BEMP report</u> suggest that “appropriate environmental indicators are measured at the process level and associated with best practise techniques” This is in line with the proposed merged criteria.
	O27 – Consumption monitoring: Energy and water sub-metering (up to 2 points)	O96. Energy and water meters (up to 2 points)	General (energy, water) <u>EMAS BEMP report</u> encourages sub-metering and benchmarking all major energy/water-consuming processes and this is reflected in the current EU Ecolabel criterion and so no update is required.

Section	Final revised criteria	Existing criteria	Environmental hotspot
Energy	Energy efficiency		
	M6 - Energy efficient space heating and water heating appliances	M3. Efficiency and heat generation	<p>Energy consumption</p> <p><u>LCA</u>: Concerning energy use, near to 78% of the total energy use during an assumed lifetime of 50 years, comes from the operation phase.</p> <p><u>EMAS BEMP report</u>: The most significant portion of energy consumption relates to space heating (31%) and water heating (17%). "Gas- and oil-fired boilers and individual room air-conditioning units do not represent best practice with respect to heating and cooling sources. However, where they are installed, the highest seasonal energy efficiency ratio, for example reflected in an 'A' rated European Energy Label, <u>should be sought for all new appliances</u>"</p> <p><u>EU Ecolabel</u>: Requirement on efficient appliances for new acquisitions.</p>
	M7 - Energy efficient air conditioning and air-based heat pumps appliances	M4. Air conditioning	<p>Energy consumption</p> <p><u>EMAS BEMP report</u>: Among the most significant portion of energy consumption relates to space heating (31%) and space cooling (15%). "...Where they are installed, the highest seasonal energy efficiency ratio, for example reflected in an 'A' rated European Energy Label, <u>should be sought for all new appliances</u>."</p> <p><u>EU Ecolabel</u>: Requirement on efficient appliances for new acquisitions.</p>
	M8 - Energy efficient lighting	M9. Energy efficient light bulbs	<p>Energy consumption</p> <p><u>EMAS BEMP report</u>: lighting represents a 12% of the total energy consumption. Best environmental practice for lighting is: "To install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural-light and time."</p> <p><u>EU Ecolabel</u>: Requires a progressive replacement of lamps by efficient lamps (including LED) in order to not produce unnecessary waste.</p>
	M9 - Thermoregulation		<p>Energy consumption</p> <p><u>EMAS BEMP report</u>: BEMP is to encourage the installation of heat recovery systems where possible. "To minimise energy consumption from HVAC systems by installing <u>zoned temperature control</u> and controlled ventilation with heat recovery (ideally controlled by CO₂ sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics.</p> <p>This is in line with the revised <u>EU Ecolabel</u> criteria.</p>
	M10 - Automatic switching off of appliances/devices	M7. Switching off heating or air conditioning M8. Switching off lights	<p>Energy consumption</p> <p><u>LCA</u>: Concerning energy use, near to 78% of the total energy use during an assumed lifetime of 50 years, comes from the operation phase. Energy saving policy recommended.</p> <p><u>EMAS BEMP report</u> outlines that information should be provided to guests/staff to encourage switching off of air conditioning and lights where appropriate. In addition, automatic switching off of heating and cooling systems</p>

Section	Final revised criteria	Existing criteria	Environmental hotspot
			intelligent lighting control is encouraged as a method of saving energy. <u>EU Ecolabel</u> : Staff training and guest information is considered an important part of the policy to reduce energy consumption however the requirement on staff/guest information concerning turn off appliances has been moved to the corresponding criteria for information provision. The revised criterion requires automatic switch off systems for new appliances and renovations.
	M11 - Outside heating and air conditioning appliances	M10. Outside heating appliances	Energy consumption Although no specific guidance on outside heating appliances where provided by BEMP/LCA there is a clear relation with the energy consumption. It is generally seen by stakeholders as a waste of energy. <u>EU Ecolabel</u> : Total restriction of outside heating appliances.
	O28 - Energy efficient space heating and water heating appliances (up to 3 points)	O33. Boiler energy efficiency (1.5 points)	Energy consumption <u>EU Ecolabel</u> : It promotes the use of most efficient HVAC systems in agreement with LCA/BEMP recommendations specified above.
	O29 - Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)	O41. Air conditioning (2 points)	Energy consumption <u>EMAS BEMP report</u> specifies that air conditioning systems should be energy efficient, properly maintained and appropriately used. <u>EMAS BEMP report</u> recognises that heat pumps can be beneficial for reducing energy consumption. BEMP recommends the installation of “efficient (e.g. ecolabelled) heat pumps for heating and cooling, or where possible ground water cooling”.
	O30 – Air-based heat pumps up to 100 kW heat output (3 points)	O37. Heat pump (2 points)	This is in line with the revised EU Ecolabel criteria. <u>EU Ecolabel</u> : The current criterion ensures that the system used is efficient.
	O31 - Energy efficient household appliances and lighting (up to 4 points)	O44. Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumbler	Energy consumption Use of efficient appliances has been highlighted by EMAS BEMP report and LCA review as practice to reduce the energy consumption during the use phase. This is in line with the proposed criteria. Higher energy classes are required in line with regulation update and market availability.

Section	Final revised criteria	Existing criteria	Environmental hotspot
		and office equipment (up to 3 points)	
	032 - Heat recovery (up to 3 points)	038. Heat recovery (1.5 points)	<p>Energy consumption</p> <p><u>EMAS BEMP report</u>: BEMP in energy is to encourage the installation of heat recovery systems where possible. “To minimise energy consumption from HVAC systems by installing zoned temperature control and controlled ventilation with <u>heat recovery</u> (ideally controlled by CO₂ sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics. This is in line with the revised EU Ecolabel criteria.</p>
	033 – Thermoregulation and window insulation (4 points)	039. Thermoregulation (1.5 points)	<p>Energy consumption</p> <p><u>EMAS BEMP report</u>: BEMP in energy is to encourage the installation of heat recovery systems where possible. “To minimise energy consumption from HVAC systems by installing <u>zoned temperature control</u> and controlled ventilation with heat recovery (ideally controlled by CO₂ sensors), energy-efficient components (e.g. variable-speed fans), and to optimise HVAC in relation to building-envelope and energy source characteristics. Building envelope has been addressed by adding requirement on window insulation. This is in line with the revised <u>EU Ecolabel</u> criteria.</p>
	034 - Automatic switch off appliances/devices (up to 4.5)	042. Automatic switching-off of air conditioning and heating systems (1.5 points)	<p>Energy consumption</p> <p><u>LCA</u>: Concerning energy use, near to 78% of the total energy use during an assumed lifetime of 50 years, comes from the operation phase. Energy saving policy recommended.</p> <p><u>EMAS BEMP report</u> outlines that automatic switching off of heating and cooling systems intelligent lighting control is encouraged as a method of saving energy. This is in line with the revised <u>EU Ecolabel</u> criteria.</p>
047. Automatic switching off lights in tourist accommodation (1.5 points)			
050. Automatic switching off outside lights (1.5 points)			
	035 - District heating/cooling and	035. District heating (1.5	<p>Energy consumption</p>

Section	Final revised criteria	Existing criteria	Environmental hotspot
	cooling from cogeneration (up to 4 points)	points) O36. Cogeneration (1.5 points)	Cogeneration or Combined Heat and Power generation, both on-site and off-site (district heating), has a significant potential for saving primary energy in the energy transformation process. The International Energy Agency has addressed the assessment of the CHP through cost-benefit analysis in two reports released in 2008 and 2009 (IEA, 2008 and IEA 2009). Some of the main conclusions were that CHP can reduce CO ₂ emissions arising from new generation in 2015 by more than 4% (170 Mt/year), while in 2030 this saving increases to more than 10% (950 Mt/year). These savings are attained due to a more efficient process (recovery of waste heat) together with a decrease of transmission and distribution losses, since the energy transformation is produced closer to the consumption centres (distributed generation). <u>EU Ecolabel</u> : To promote district heating and cogeneration in order to save on primary energy consumption
	O36 - Electric hand driers with proximity sensor (1 point)	O45. Hand driers with sensors (2 points)	Energy consumption No specific mention on LCA/ EMAS BEMP report. 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.
	O37. Space Heater emissions (1.5 points)	O34. Boiler NOx (1.5 points)	Energy consumption <u>EMAS BEMP report</u> : There is no specific guidance for setting limits for boiler NOx emissions. However, <u>regular maintenance of all HVAC equipment is encouraged</u> . This is the line with the revised EU Ecolabel criteria
Energy from renewable sources			
	M12 - Procurement of electricity from a renewable electricity supplier	M1. Electricity from renewable sources	Energy consumption <u>LCA</u> : Electricity consumption represents the largest energy demand and source of GHG emissions. Respiratory inorganics is 68.5% due to electricity consumption and the contribution to climate change comes mainly from electricity consumption (69.4%). A 20% contribution from renewable energy leads to a reduction of 45% of the CO ₂ emissions in the operation phase. <u>EMAS BEMP report</u> : The best environmental practice for electricity from renewable sources is “To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier. <u>EU Ecolabel</u> : It refers directly to procuring green electricity.
	M13 - Coal and heating oils	M2. Coal and heavy oils	Energy consumption <u>LCA</u> : suggested energy production (power and thermal energy) is among the main burdening processes, and acidification as one of the main environmental impacts related to fuel consumption. In addition, the LCA literature review suggests that 20% contribution from renewable energy leads to a reduction of 45% of the CO ₂ emissions in the operation phase.

Section	Final revised criteria	Existing criteria	Environmental hotspot
			<p><u>EMAS BEMP report</u>: The most significant portion of energy consumption relates to space heating (31%) and water heating (17%). "... Gas- and oil-fired boilers do not represent best practice with respect to heating and cooling sources..."</p> <p><u>EU Ecolabel</u>: It poses restrictions on coal/heavy oil as a heating sources</p>
	O38 - Procurement of electricity from a renewable electricity supplier (up to 4 points)	-----	<p>Energy consumption</p> <p><u>LCA</u>: Electricity consumption represents the largest energy demand and source of GHG emissions. Respiratory inorganics is 68.5% due to electricity consumption and the contribution to climate change comes mainly from electricity consumption (69.4%). A 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.</p> <p><u>EMAS BEMP report</u>: The BEMP for electricity from renewable sources is "To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier.</p> <p><u>EU Ecolabel</u>: It refers directly to procuring labelled green electricity (100% form RES).</p>
	O39 - On site self-generation of electricity through renewable energy sources (up to 5 points)	O31. Renewable electricity generation (up to 4 points)	<p>Energy consumption</p> <p><u>LCA</u>: Electricity consumption represents the largest energy demand and source of GHG emissions. A 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.</p> <p><u>EMAS BEMP report</u>: The BEMP for electricity from renewable sources is "To install on-site geothermal, solar or wind energy generation where appropriate, and to procure electricity from a genuine (verifiable additional) renewable electricity supplier.</p> <p><u>EU Ecolabel</u>: It promotes the onsite renewable energy generation.</p>
	O40 - Heating energy from renewable energy sources (up to 3.5 points)	O32. Energy from renewable sources (up to 2 points)	<p>Energy consumption</p> <p><u>LCA</u>: suggested energy production (power and thermal energy) is among the main burdening processes. In addition, the LCA literature review suggests that 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.</p> <p><u>EU Ecolabel</u>: to promote renewable sources for heating purposes.</p>
	O41 - Swimming pool heating (up to 1.5 points)	O49. Swimming pool heating with renewable energy sources(up to 1.5 points)	<p>Energy consumption</p> <p><u>EMAS BEMP report /LCA</u>: in general heating from renewable energy sources is promoted.</p> <p>We understood that swimming pool heating is a common practice in cold weather areas in order to meet quality standards expected by consumers. As we cannot ban this practice, we think that it would be important to promote that this is done through the use of renewable energy sources.</p>
Water	Efficient water devices		
	M14 – Efficient	M11. Water flow	Water consumption

Section	Final revised criteria	Existing criteria	Environmental hotspot
	water fittings: Bathroom taps and showers	from taps and showers	<p><u>EMAS BEMP report</u> identifies water use in tourist accommodation as a significant environmental aspect. It is estimated that water can account for approximately 10% of utility bills in hotels, but this can vary considerably across different types of accommodation and is dependent on the facilities offered (for example a swimming pool or laundry facilities).</p> <p>BEMP for water flow is “to minimise water consumption through the installation of low-flow taps and showers” and proposes as a benchmark of excellence: Shower flow rate \leq 7 L/min and bathroom tap flow rate \leq 6 L/min. There is a real opportunity for tourist accommodations to better manage water consumption, reducing their environmental burden and potential high cost of water use.</p> <p>The EU Ecolabel criterion set mandatory criterion at 8 litres/minute.</p>
	M15 - Efficient water fittings: toilets and urinals	M13. Urinal flushing	<p>Water consumption</p> <p><u>EMAS BEMP report</u> advises the avoidance of continuous flushing of urinals.</p> <p>The EU Ecolabel criterion is currently in line with this. However with the aim to simplify the criteria text and that WCs are more frequently used than urinals, it is proposed to merge this criterion with current criterion 54 WCs flushing.</p>
	O42 - Efficient water fittings: Bathroom taps and showers (up to 4 points)	O53. Water flow from taps and showerheads (1.5 points)	<p>Water consumption</p> <p><u>EMAS BEMP report</u>: BEMP for water flow is “to minimise water consumption through the installation of low-flow taps and showers” and proposes as a benchmark of excellence: Shower flow rate \leq 7 L/min and bathroom tap flow rate \leq 6 L/min.</p> <p>It is suggested for the EU Ecolabel criterion to compromise by adjusting the limit to 6 litres/minute, which is the limit allowed for EU Ecolabel sanitary tapware. Additionally, a requirement on labelled taps and shower heads has been proposed.</p>
	O43 - Efficient water fittings: Toilets and urinals (up to 4.5 points)	O54. WC flushing (1.5 points) O62. Water saving urinals (1.5 points)	<p>Water consumption</p> <p><u>EMAS BEMP report</u> measures are outlined as the “Installation or retrofitting of controlled-flush or <u>waterless urinals</u>”.</p> <p>This corresponds with the existing EU Ecolabel criterion. In addition, a requirement on labelled urinals and toilets has been proposed. The title has been reworded to reflect the change</p>
	O44 - Dishwasher water consumption (2.5 points)	O55. Dishwasher water consumption (1 point)	<p>Water consumption</p> <p><u>EMAS BEMP report</u>: Selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption is best practice.</p> <p>The EU Ecolabel criterion is in line with this for dishwasher use. For the revised proposal, it is proposed to align the water consumption thresholds to the benchmarks identified at the respective Ecodesign directives.</p>

Section	Final revised criteria	Existing criteria	Environmental hotspot
	045 - Washing machine water consumption (3 points)	056. Washing machine water consumption (1 point)	<p>Water consumption <u>EMAS BEMP report:</u> Selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption is best practice. Benchmark for commercial washing machines is to have an average laundry water consumption ≤ 7 L per kg of laundry washed. The EU Ecolabel criterion is in line with this for dishwasher use. For the revised proposal, it is proposed to align the water consumption thresholds to the benchmarks identified at the respective Ecodesign directives and BEMP benchmark for commercial appliances.</p>
Automatic devices and/or procedures to decrease water consumption			
	M16 – Reduction in laundry achieved through reuse of towels and bedclothes	M14. Changing towels and sheets	<p>Water consumption <u>EMAS BEMP report:</u> Efficient housekeeping operations, such as implementation of a bedclothes and towel re-use scheme or employing water saving cleaning methods (such as turning off taps when cleaning or only flushing toilets as required) can reduce water usage. A high turnaround of towels and sheets within a tourist accommodation site gives rise to a significant environmental impact. <u>EU Ecolabel</u> is to “encourage guests to re-use towels and bin liners” by “prominent notices for guests advising on specific measures, including towel and bedclothes re-use”.</p>
	046 - Indications on water hardness (up to 1 point)	061. Indication on water hardness (up to 2 points)	<p>Water consumption & Toxicity derived from chemical consumption <u>EMAS BEMP report</u> suggests that “in addition to training and signage, clear marking of fill levels on spray bottles can reduce the incidence of incorrect dilution. Dilution volumes should be adjusted for water hardness.” This is covered in the EU Ecolabel criterion.</p>
	047 Optimised pool management (up to 2.5 points)	059. Swimming pool cover (1 point) 068. Swimming pools: Dosage of disinfectants or natural/ecological swimming pools(1 point)	<p>Water consumption BEMPs for the operating of swimming pools are:</p> <ul style="list-style-type: none"> o The correct use of pool covers to reduce heat loss. o Minimisation of chlorine consumption through optimised dosing and use of supplementary disinfection methods such as ozonation and UV treatment. o In addition, natural pool installation is suggested: The on-site swimming pool(s) incorporate(s) natural plant-based filtration systems to achieve water purification to the required hygiene standard. <p>This is in accordance with the current EU Ecolabel criterion however the criterion has been modified to better reflect the benchmarks of excellence suggested in EMAS BEMP report. The title has been amended to better reflect the aim of the criterion.</p>
	048 -Rainwater and grey water recycling (up to 3)	051. Use of rainwater and recycled (up to 4)	<p>Water consumption <u>BEMP</u> for the use of rain and recycled water is to “install a grey water recovery system that recovers grey water for use in indoor processes (e.g. toilet flushing) following treatment or exterior processes (e.g. irrigation), or a</p>

Section	Final revised criteria	Existing criteria	Environmental hotspot
	points)	points)	rainwater collection system that uses rainwater for indoor purposes.” Alternative water sources help conserve water, lower energy usage from water treatment facilities, and reduce stress on sewage. <u>EU Ecolabel</u> revised criterion has been partially aligned to Tripadvisor Greenleaders to allow more comprehensive criteria which cover other types of alternative water sources in line with EMAS BEMP report.
	O49 - Efficient irrigation (up to 1.5 points)	O52. Automatic watering systems for outside areas (1.5 points)	Water consumption <u>EMAS BEMP report</u> specifies that water consumption for irrigation should be minimised. EU Ecolabel promotes the use of automatic system and the training of the staff to carry out efficient irrigation.
	O50 - Native or non-invasive alien species used in outdoor planting (2 points)	63. Indigenous species outdoor planting (1 point)	Water consumption Best practice measures for tourist accommodation include “Planting of green areas with native species to minimise irrigation requirements”. This is in line with the current EU Ecolabel criterion and so it is proposed that no update is made as a result of stakeholder comments.
Waste and wastewater	Waste prevention through reduction and procurement		
	M17 – Waste prevention: Food service waste reduction plan	M21. Breakfast packaging	Waste generation <u>EMAS BEMP report</u> : “Prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps, shampoos) and by buying cleaning agents in concentrated and bulk form – and by <u>careful management of procurement volumes</u> .” <u>LCA</u> revealed that concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total. <u>EU Ecolabel</u> criterion aim of is to manage the waste derived from food services (packaging and food).
	M18 - Waste prevention: Disposable items	M20. Disposable products	Waste generation. <u>LCA</u> concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total. LCA studies suggest that separate waste collection and domestic solid waste composting would contribute to a <u>reduction in quantity</u> of waste produced. <u>EMAS BEMP report</u> guidance highlights the importance of waste prevention, and uses the avoidance of single-use items as a way of achieving this: “Prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps, shampoos) and by buying cleaning agents in concentrated and bulk form – and by careful management of procurement volumes.” This is in line with the EU Ecolabel criterion which restricts the use of a number of disposable products.

Section	Final revised criteria	Existing criteria	Environmental hotspot
	051 –Paper Products (up to 2 points)	088. Paper products (up to 3 points)	<p>Procurement & Waste generation</p> <p><u>EMAS BEMP report</u> encourages minimisation of the use of resources, “especially paper and ink” and to “select environmentally certified materials and services (e.g. printing services)” where possible. Again, this is in line with the current <u>EU Ecolabel</u> criteria for paper products.</p>
	052 - Durable goods (up to 4 points)	089. Durable goods (up to 3 points)	<p>Procurement & Waste generation</p> <p>In general, <u>EMAS BEMP report</u> specifies that eco-labelled products (those certified to Type I schemes such as the EU Ecolabel) are preferable - environmental impacts have been considered and are minimised compared to other products on the market.</p>
	053 - Beverages provision (2 points)	073: Disposable drink containers 086. Refillable bottles (3 points)	<p>Waste generation.</p> <p><u>BEMP</u> is to minimise residual waste generation by implementing waste prevention, and recommend avoiding procurement of single-use items.</p> <p><u>EU Ecolabel</u>: It is suggested to merge this criterion, that addresses disposable drink containers, with the criterion that encourages the tourist accommodation to offer beverages in returnable/refillable bottles (Criterion 86: Returnable or refillable bottles).</p>
	054 - Detergents and toiletries procurement (up to 2 points)	064. Detergents (up to 3 points)	<p>Waste generation & Chemicals use</p> <p><u>EMAS BEMP report</u> suggests a benchmark of excellence for the use of detergents, which specifies that “at least 70% of the purchase volume of chemical cleaning products (excluding oven cleaners) for dish washing and cleaning are Ecolabelled.</p> <p>This criterion is in line with the BEMP guideline.</p>
	055 - Cleaning products use minimisation (1.5 point)	069. Mechanical cleaning (1 point)	<p>Waste generation & Chemicals use</p> <p>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.”</p> <p>This is in line with the EU Ecolabel criterion</p>
	056 - De-icing (1 point)	060. De-icing (1.5 point)	<p>Waste generation & Chemicals use</p> <p>BEMP primarily relates to minimising the use of chemicals on site, including those used for de-icing. There have</p>

Section	Final revised criteria	Existing criteria	Environmental hotspot
			been no updates to BEMP since the previous TAS and CSS criteria revision, and so no updates are suggested.
Re-use goods			
	057 - Used textiles and furniture (up to 2 points)	076. Used textiles, furniture and other products (3 points)	Waste generation. <u>EMAS BEMP report</u> promotes the importance of the waste hierarchy: Reduce/Re-use/Sort/Recycle. EU Ecolabel criterion is in line with this.
Sort and recycling waste			
	M19 - Waste sorting and sending for recycling	M12. Waste bins in toilets M18. Waste separation by guests M19. Waste separation 074. Fat/oil disposal (2 points)	Waste generation. <u>LCA</u> concerning waste generation, the biggest generation of waste products occurs during both the <u>operation</u> and the demolition phase. Organic solid waste represents 79.9% of the total. LCA studies suggest that separate waste collection and domestic solid waste composting would contribute to a reduction in quantity of waste produced. <u>BEMP</u> is “to minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting water recycling services”. <u>EU Ecolabel</u> criteria addressing waste separation have been merged as both are tackling the same topic. The criteria are in line with BEMP and LCA suggestions.
	058 - Composting (up to 2 points)	072. Composting (2 points)	Waste generation. <u>LCA</u> concerning waste generation, the biggest generation of waste products occurs during both the operation and the demolition phase. Organic solid waste represents 79.9% of the total. LCA studies suggest that separate waste collection and <u>domestic solid waste composting</u> would contribute to a reduction in quantity of waste produced. <u>BEMP</u> is “to minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting water recycling services”. <u>EU Ecolabel</u> : It is suggested that the criterion is aligned to Trip advisor Greenleaders and to award an extra point to those applicants that compost biodegradable materials and that compost the waste produced by guests.
Waste water management and treatment			

Section	Final revised criteria	Existing criteria	Environmental hotspot
	O59 - Waste water treatment (up to 3 points)	M16. Disposal Point (CSS) O66. Car washing in specially outfitted areas (1 point)	<p>wastewater management</p> <p><u>EMAS BEMP report</u> suggests that wastewater management is a relevant environmental aspect related to the accommodation and best practices are also provided to better manage this. In order to ensure proper wastewater treatment and facilitate this as best as possible BEMP actions suggest:</p> <p>Waste sorting and waste water treatment where there is not access to centralized waste water treatment. In this later case, BEMP is to install an on-site waste water treatment system that treats waste water at least to secondary, and preferably to tertiary, level, and includes at least pretreatment to screen solids and settle particulate matter followed by efficient biological treatment (e.g. in a sequencing batch reactor) to remove a high proportion of COD, BOD, nitrogen and phosphorus from the final effluent. Sludge is treated and disposed of in an environmentally acceptable manner.</p> <p>.This is the line with the revised EU Ecolabel criteria</p>
Other criteria	M20 - No smoking in common areas and rooms	M22. No smoking in common areas	There is no BEMP for restricting smoking in tourist accommodation. However, for a service, such as tourist accommodation, the quality of the service provided is one of the main ways a business can distinguish itself in a highly competitive market. Restriction on smoking was considered important to be addressed at EU Ecolabel for TAS&CSS.
	M21 - Promotion of environmentally preferable means of transport	M23. Public transportation	<p>Transportation</p> <p><u>LCA</u> revealed that transport system has a higher impact than accommodation services itself in the <u>acidification (AP) and abiotic depletion (ADP)</u> categories.</p> <p>Furthermore, a LCA suggested that guest transportation (from home to home), could include more effective actions to promote the most environmentally-sound forms of transport, as well as discourage the most polluting ones.</p> <p><u>EMAS BEMP report</u> guidance highlights the importance of encouraging the use of public transport.</p> <p><u>EU Ecolabel</u> to promote preferable means of transport.</p>
	M22 - Information appearing on the EU Ecolabel	M30. Information appearing on the eco-label	<p>General (energy, water, waste, chemical use, procurement, transport)</p> <p>We propose that the 'information appearing on the Ecolabel' is added to the details of what the certificate and logo will contain, which is found in the User Manual. This would provide a potential licensee with details of the text that will appear on the EU Ecolabel logo that they could then use for promotional purposes following the award of a licence. The current text is considered to be valid for the revised criteria.</p>
	O60 - No smoking in rooms (1 point)	O83. No smoking (up to 1.5 points)	There is no BEMP for restricting smoking in tourist accommodation. However, for a service, such as tourist accommodation, the quality of the service provided is one of the main ways a business can distinguish itself in a highly competitive market. Restriction on smoking was considered important to be addressed at EU Ecolabel for TAS&CSS.
	O61- Social policy	-----	Although the EU Ecolabel is predominantly concerned with environmental issues, the EU Ecolabel Regulation

Section	Final revised criteria	Existing criteria	Environmental hotspot
	(up to 2 points)		66/2010 which governs the scheme does allow social aspects to be considered, where they are relevant. Therefore it is proposed to include the employment requirements addressed in other environmental schemes for tourism which cover minimum national legislation and further.
	062- Tourist accommodation maintenance generated traffic (1 point)	077. Regulation of campsite traffic (campsite only) (1 point) 078. Campsite generated traffic (campsite only) (1 point)	Transportation <u>BEMP</u> is to regulate traffic effectively to ensure minimisation of emissions. <u>EU Ecolabel</u> criterion is in line with this.
	063 - Environmentally preferable means of transport offer (up to 2.5 points)	084. Bicycles (1.5 points) 079. Trolleys for guests (campsite only) (1 point) 085. Pick up service (1 point)	Transportation <u>EMAS BEMP report</u> does not specify best practice for the number of bikes which should be provided to guests in tourist accommodation. However, low-carbon forms of transport (including bikes) should be encouraged. Revised <u>EU Ecolabel</u> criteria suggest to require a higher number of bicycles available than current criterion.
	064 - Unsealed surfaces (1 point)	080. Unsealed surfaces (campsite only) (1 point)	Outside areas <u>EMAS BEMP report</u> references EU Ecolabel requirements as good practice in management of outside areas, including Criterion 80: Unsealed surfaces. Unsealed surfaces allow an increase of water filtration and diminution of water pollution associated to runoff from sealed asphalt surfaces, leading to a positive impact on biodiversity and wastewater management. EU Ecolabel promotes unsealed surfaces.
	065 - Local and organic products (up to 4 points)	090. Local food products (up to 3 points) 091. Organic food (up to 3 points)	Procurement and transport <u>EMAS BEMP report</u> for kitchens in tourist accommodation is to “assess food and drink supply chains to identify environmental hotspots and key control points, including choice editing of menus to avoid particularly damaging ingredients (e.g. some out-of-season fruit), and selection of environmentally-certified products.” <u>EMAS BEMP report</u> for food provision refers to “choice editing of menus to avoid particularly damaging ingredients (e.g. some out of season fruit), and selection of environmentally-certified products.” In general, it is considered best practice to source all products locally and organic where possible This is the line with the revised EU Ecolabel criteria

Section	Final revised criteria	Existing criteria	Environmental hotspot
	066 - Pesticide avoidance (2 points)	070. Organic gardening (2 points)	<p>Outside areas</p> <p><u>EMAS BEMP report</u> suggests minimising the use of pesticides and other chemicals throughout the tourist accommodation. This corresponds with existing EU Ecolabel criteria.</p>
	067 - Additional environmental and social actions (up to 3 points)	097. Additional environmental and social actions (up to 4 points)	
Removed			
	Partially addressed in pre-requisite section and optional criteria	M5. Energy efficiency of buildings	<p>These criteria are mostly addressing legal requirements and as the EU Ecolabel is a label of excellence it has been decided to include these requirements in the pre-requisite section. In addition, best practices on window Insulation is additionally covered in O33 – Thermoregulation and window insulation. Building envelope has been addressed by adding a requirement on window insulation under the revised criterion.</p>
		M6. Window Insulation	
		M15. Correct wastewater disposal	
	-----	040. Energy performance audit	<p>With the aim being to simplify the criteria set and to focus on environmental hotspots, it is suggested that these criteria are removed as a number of other EU Ecolabel criteria are already addressing the main environmental hotspots for tourist accommodation. In addition, the analysis carried out for 693 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the low impact criteria revealed a low fulfilment for these criteria compare to other optional criteria. (See section 4)</p>
	-----	043. Bioclimatic architecture	
	-----	046. Refrigerator positioning	
	-----	57. Tap water temperature and flow	
	-----	58. Shower timers	
	-----	65. Indoor and outdoor paints and varnishes	

Section	Final revised criteria	Existing criteria	Environmental hotspot
	-----	071. insect and pest repellents	
	-----	075. Run-off from car parks (campsite only)	
	-----	087. Use of rechargeable products	
	-----	081. Roof landscaping	
	-----	092. Indoor air quality	

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

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

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

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

Table 3 Comparison of the criteria sections

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

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

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

Proposed sections	Proposed simplified criteria	Current EU Ecolabel
	M5. Consumption monitoring	M28. Energy and water consumption data M29. Other data collection
	O23 - EMAS registration, ISO certification of the tourist accommodation (up to 5 points)	O93. EMAS or ISO registration of the tourist accommodation (up to 3)
	O24 - EMAS registration or ISO certification of suppliers (up to 5 points)	O94. Suppliers EMAS or ISO registered (up to 1.5)
	O25 - Ecolabelled services (up to 4 points)	O95. Subcontractors comply with mandatory criteria (up to 4 points)
	O26 - Environmental and social communication and education (up to 2 points)	O82. Environmental communication and education (up to 3 points)
	O27 - Consumption monitoring: Energy and water sub-metering (up to 2 points)	O96. Energy and water meters (up to 2 points)
Energy	M6 - Energy efficient space heating and water heating appliances	M3. Efficiency and heat generation
	M7 - Energy efficient air conditioning and air-based heat pumps appliances	M4. Air conditioning
	M8 - Energy efficient lighting	M9. Energy efficient light bulbs
	M9 - Thermoregulation	
	M10 - Automatic switching off of appliances/devices	M7. Switching off heating or air conditioning M8. Switching off lights
	M11 - Outside heating and air conditioning appliances	M10. Outside heating appliances
	M12 - Procurement of electricity from a renewable electricity supplier	M1. Electricity from renewable sources
	M13 - Coal and heavy oils	M2. Coal and heavy oils
	O28 - Energy efficient space heating and water heating appliances (up to 3 points)	O33. Boiler energy efficiency (1.5 points)
	O29 - Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)	O41. Air conditioning (2 points)
	O30 - Air-based heat pumps up to 100 kW heat output (3 points)	O37. Heat pump (2 points)
	O31 - Energy efficient household appliances and lighting (up to 4 points)	O44. Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumbler and office equipment (up to 3 points)
	O32 - Heat recovery (up to 3 points)	O38. Heat recovery (1.5 points)
	O33 - Thermoregulation and window insulation (up to 4 points)	M6. Window insulation O39. Thermoregulation (1.5 points)
	O34 - Automatic switch off appliances/devices (up to 4.5)	O42. Automatic switching-off of air conditioning and heating systems (1.5 points)
		O47. Automatic switching off lights in tourist accommodation (1.5 points)
		O50. Automatic switching off outside lights (1.5 points)
	O35 - District heating/cooling and cooling from cogeneration (up to 4 points)	O35. District heating (1.5 points)
		O36. Cogeneration (1.5 points)

Proposed sections	Proposed simplified criteria	Current EU Ecolabel
	036 - Electric hand driers with proximity sensor (1 point)	045. Hand driers with sensors (2 points)
	037. Space Heater NOx emissions (1.5 points)	034. Boiler NOx (1.5 points)
	038 - Procurement of electricity from a renewable electricity supplier (up to 4 points)	-----
	039 - On site self-generation of electricity through renewable energy sources (up to 5 points)	031. Renewable electricity generation (up to 4 points)
	040 - Heating energy from renewable energy sources (up to 3.5 points)	032. Energy from renewable sources (up to 2 points)
	041 - Swimming pool heating (up to 1.5 points)	049. Swimming pool heating with renewable energy sources(up to 1.5 points)
Water	M14 – Efficient water fittings: Bathroom taps and showers	M11. Water flow from taps and showers
	M15 - Efficient water fittings: toilets and urinals	M13. Urinal flushing
	M16 – Reduction in laundry achieved through reuse of towels and bedclothes	M14. Changing towels and sheets
	042 - Efficient water fittings: Bathroom taps and showers (up to 4 points)	053. Water flow from taps and showerheads (1.5 points)
	043 - Efficient water fittings: Toilets and urinals (up to 4.5 points)	054. WC flushing (1.5 points) 062. Water saving urinals (1.5 points)
	044 - Dishwasher water consumption (3 points)	055. Dishwasher water consumption (1 point)
	045 - Washing machine water consumption (3 points)	056. Washing machine water consumption (1 point)
	046 - Indications on water hardness (up to 1.5 points)	061. Indication on water hardness (up to 2 points)
	047 Optimised pool management (up to 3 points)	059. Swimming pool cover (1 point) 068. Swimming pools: Dosage of disinfectants or natural/ecological swimming pools(1 point)
	048 -Rainwater and grey water recycling (up to 3 points)	051. Use of rainwater and recycled (up to 4 points)
	049 - Efficient irrigation (up to 1.5 points)	052. Automatic watering systems for outside areas (1.5 points)
	050 - Native or non-invasive alien species used in outdoor planting (2 points)	63. Indigenous species outdoor planting (1 point)
	Waste and wastewater	M17 – Waste prevention: Food service waste reduction plan
M18 - Waste prevention: Disposable items		M20. Disposable products
M19 - Waste sorting and sending for recycling		M18. Waste separation by guests M12. Waste bins in toilets M19. Waste separation 074. Fat/oil disposal
051 –Paper Products (up to 2 points)		088. Paper products (up to 3 points)
052 - Durable goods (up to 4 points)		089. Durable goods (up to 3 points)
053 - Beverages provision (2 points)		073: Disposable drink containers 086. Refillable bottles (3 points)

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

Proposed sections	Proposed simplified criteria	Current EU Ecolabel
	-----	081. Roof landscaping
	-----	092. Indoor air quality

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

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

EMAS allows organisations to evaluate, report, and improve their environmental performance. Those companies that wish to participate in EMAS develop an environmental management system (EMS) and commit to continuously improve their environmental performance. They also have to regularly publish an environmental statement highlighting their progress. EMAS registration ensures that the EMS implemented by an organisation is verified by a third party, and focuses on the actions under the direct control of the company as well as actions on which it has a considerable influence. EMAS does not set targets or benchmarks for environmental goals; however, Sectoral Reference Documents [JRC IPTS (2014)] are available or under development for certain economic sectors, e.g. tourism. These documents contain the description of best practices in improvement of environmental performance, as well as indicators and benchmarks to monitor the progress achieved. They aim to provide guidance and inspiration to companies on how to improve their environmental performance. EMAS-registered organisations from the sectors where Sectoral Reference Documents are available have to take these documents into account, but there is no obligation for EMAS-registered organisations to follow the best practices or achieve any of the benchmarks.

On the other hand, the EU Ecolabel is awarded to the 10-20% best performing products or services on the market that can show that they reduce environmental impacts along the life cycle stages. Within this proposal for the EU Ecolabel for Tourist Accommodation, specific requirements are set for the provision of services and the related use of products and equipment. Furthermore, although the EU Ecolabel is predominantly concerned with environmental issues, the EU Ecolabel Regulation 66/2010 which governs the scheme does allow social aspects to be considered, where they are relevant. Thus, the revised proposal suggests the inclusion of social criteria aligned to other environmental schemes that deal with wider sustainability issues. The identified thresholds constitute pass and fail requirements for awarding the EU Ecolabel. The EU Ecolabel is awarded after a third party verification.

In summary, the implementation of EMAS by a company provides it with a structured framework for considering its most relevant environmental impacts, for monitoring and continuously improving its environmental performance, and for reporting publicly on this. It also offers guidance on, potentially, achieving the best performance levels thanks to the voluntary implementation of best practices. On the other hand, the EU Ecolabel recognises the very high level of environmental performance achieved by certain products or services provided by the company that fulfil a define set of criteria.

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

Moreover, in the development of the proposal for the EU Ecolabel criteria for the service group of Tourist Accommodation all possible synergies between EMAS and the EU Ecolabel have been exploited. [Criterion 1: Basis of an Environmental Management System](#), [Criterion 5: Consumption monitoring](#) and [Criterion 23: EMAS registration, ISO certification of the tourist accommodation \(up to 5 points\)](#) link to EMAS. As part of a mandatory requirement, criterion 1,

the company is required to have implemented the basic requirements of an Environmental Management System. As part of the optional requirement 22, the accommodation is required to provide evidence of EMAS registration or ISO 14001 certification. In addition, mandatory criterion 5 uses several of the main indicators proposed by the EMAS Sectoral Reference Document [JRC IPTS (2016)] assuring that key consumption activities of the tourist accommodation are monitored according to harmonized indicators.

2 ASSESSMENT AND VERIFICATION

Assessment and verification

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

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

Competent bodies shall preferentially recognise attestations which are issued by bodies accredited according to the relevant harmonised standard for testing and calibration laboratories and verifications by bodies that are accredited according to the relevant harmonised standard for bodies certifying products, processes and services. Accreditation shall be carried out according to the provisions of Regulation (EC) 765/2008 of the European Parliament and of the Council.

Information extracted from environmental statements submitted under the eco-management and audit scheme (EMAS) of the Union are considered equivalent means of proof as the attestations mentioned in the previous paragraph.

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

Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications.

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

As a pre-requisite, the services shall meet all respective legal requirements of the country (countries) in which the 'tourist accommodation' is located. In particular, the following shall be guaranteed:

1. The physical structure respects Union, national and local laws and regulations regarding energy efficiency and thermal insulation, water sources, water treatment and disposal (including chemical toilets), waste collection and disposal, maintenance and servicing of equipment, safety and health dispositions and any relevant laws or regulations of the area related to landscape and biodiversity conservation.

2. The enterprise is operational and registered, as required by national or local laws and its staff are legally employed and insured. For this purpose, staff shall have a national legal written contract, shall be paid at least the national or regional minimum wage set by collective agreements (in the absence of collective agreements, the staff shall be paid at least the legal national or regional minimum wage), and shall have working hours complying with the national law.

The applicant shall declare and demonstrate the service's compliance with those requirements, using independent verification or documentary evidence without prejudice of data protection national law (e.g. construction license/authorization, declarations of professional technicians explaining how national legislation and local regulations related to the above mentioned aspects of the building are met, copy of a written social policy,

Assessment and verification

copies of contracts, statements of employee's registration in the social security/national insurance system, official documentation/register recording the names and number of employees by the local Government's Employment Inspectorate or Agent) and moreover direct random staff interview could be done during on-site visit.

Rationale

- The assessment and verification text refers to the different type of evidence that is considered as relevant for the each type of criteria and include the revised harmonized text which is included in the most recently adopted EU Ecolabel criteria.
- The EU Ecolabel Regulation (EC) No 66/2010 indicates that Competent Bodies shall preferentially recognise verifications performed by bodies which are accredited under the EN 45011. However, this standard is nowadays phased-out and certification bodies are no longer accredited in accordance with these requirements. A new statement has been included in the text.
- Where appropriate, test methods other than those indicated for each criterion may be used if the component body assessing the application accepts their equivalence. Against this background and considering the complementarity among EU Ecolabel and EMAS, a specification was introduced to consider statements extracted from EMAS declarations as equivalent means of proof as the attestations.
- In addition to the initial mandatory on-site visit (already included in current text in force), a specific text in reference to an optional follow up on-site visits was introduced during the revision process reflecting current best practices of several CBs to assure continuous compliance.
- At TR3.0, the legal pre-requisites or preconditions were modified as follow:
 - The point 1 was further specified to address three of the current criteria: M5. Energy efficiency of buildings, M6. Window Insulation and M16. Chemical Toilet Disposal (See [annex I](#) for current criteria) as they are mainly addressing legal requirements.
 - The social part (point 2) was extended to better reflect staff legal requirements. The text is suggested to be further specified by introducing specifications provided within the Sustainable Restoration Scheme (<http://www.thesra.org/>) as suggested by stakeholders, which baseline criteria are written contract, minimum legal wage and working hours in accordance with the national law.
 - The text for assessment the prerequisites was amended to request additional evidence to show compliance for the legal requirements. The documentary evidence has been further detailed. Furthermore, it is suggested to include the possibility to allow Competent Body that considers relevant to have a higher degree of assurance performing random interview during the on-site visit. Additionally, there is an optional social requirement which includes a written social policy that could be used as a mean of proof for pre-requisites and the optional one. (see section 3.10.2)
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- In TR4.0, minor amendments were introduced as a response to stakeholder's comments received.

- In addition, regarding the discussions held in June 2016 EUEB the wording was slightly modified to reflect the situation in Nordic countries where sectorial collective agreements might not be available. A more open wording ('collective agreements') has been proposed in the final version to cover either sectorial agreements or company agreements made with trade unions.

3 CRITERIA PROPOSAL

3.1 Mandatory criteria related to general management

3.1.1 Criterion 1: Basis of an Environmental Management System

Proposal for criterion 1: Basis of an Environmental Management System

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

- an environmental policy identifying the most relevant environmental aspects regarding energy, water and waste relevant to the accommodation;
- a precise action programme establishing targets on environmental performance regarding identified environmental aspects, which shall be set at least every two years, taking into consideration requirements set by this EU Ecolabel. If environmental aspects identified are not addressed by this EU Ecolabel, targets should preferably be based on environmental performance indicators and benchmarks of excellence set by the reference document on best environmental management practice for the tourism sector (EMAS);
- an internal evaluation process allowing verifying at least yearly organisation performances with regard to the targets defined in the action program and setting correction actions if needed.

Information on the processes mentioned in the previous paragraph shall be available for consultation by the guests and staff.

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

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

- a copy of the environmental policy,
- the action programme, and
- the evaluation report, which shall be made available to the competent body within 2 years after the application, and the updated version every two years.

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

Rationale of Proposed Criterion text

- At the TR2.0 current criterion *M 25: Policy setting and environmental programme Disinfectants* (See [annex I](#) for current criteria) was proposed to be deleted, instead more points were suggested for EMAS and ISO criteria in order to recognise the potential environmental benefit associated to third party EMSs. Overall stakeholders showed

disagreement on its deletion as support for this criterion as it would help companies that do not have an EMS set –up to put in place the most important parts of one. This is especially important in the case of SMEs as their limited resources can be an obstacle to getting an ISO14001 certification or EMAS registration.

- Against this background it was suggested to reintroduce the criterion at TR3.0 and to modify the criterion text in order to better define the requirements.
- It was suggested to introduce the main pillars of a EMS, which should limit the burdens on the tourist accommodation while still providing environmental benefits. Moreover, companies that take the initiative of implementing the principles of the environmental management system should be recognised. The proposed criterion text contained explicit information stating what measures the company must put in place in order to have the basis for an EMS, although not EMS was required. In addition to the targets on environmental performance of the EU Ecolabel criteria, benchmarks of excellence set by the reference document on best environmental management practice for the tourism sector (EMAS) were specified to be considered in the set-up of the action plan. In order to facilitate the verification and assessment of the criterion, companies that already have a certified or registered EMS were suggested to be considered as complying with the criterion..
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- As a response to comments received in TR4.0, minor amendments to make the text clearer were introduced after the TR3.0. Several stakeholders expressed that they were more comfortable with current formulation of this criterion since they claimed that applicants might not be acquainted with EMAS. However, the current wording of the criterion just constitutes the 'Plan' stage of the Plan-Do-Check-Act principles (the basis of the management systems). It is suggested that the revised criterion covers also the Do-Check-Act stages to ensure the practical implementation of the policy and environmental program. Nevertheless, in order to simplify the criterion, in TR4.0, it is proposed to withdraw the requirement on the environmental report, while specifying that correction actions should be derived from the internal evaluation, if they are needed to attain the targets. The criterion is proposed to be verified by the internal evaluation report which includes the correction actions (if needed). This would make the criterion easier to implement by SMEs, where the organizational structures do not enable to split up the manager of the organization from the responsible of the environmental management system, and therefore, the environmental (or management review) report would just mean to duplicate the reporting with no additional information. In addition, the wording has been slightly modified to highlight Plan-Do-Check stages and better define the aim of the criterion. The updated wording is clearer and will give higher flexibility to applicants while keeping the main aspects of an environmental management plan.
- A Competent Body mentioned that data on consumption is collected yearly in (see section 3.1.5) while the audit/evaluation report is reported to Competent Bodies every two years. Therefore they asked for alignment and suggested to set the frequency for the internal audit to 1 year. The criterion has been amended accordingly, however in order to diminish the burden on data provision to competent bodies that might derive from yearly reporting,

the reports still are suggested to be maintained to be provided every two years as proposed in TR3.0 in order to have a systematic and periodical process.

- No substantial changes have been introduced since criteria published in TR4.0.

Rationale of proposed "Assessment and verification"

- In addition to the declaration of compliance, the applicant is requested to provide the following evidence:
 - a copy of the environmental policy,
 - the action programme andconsidering that results from the internal evaluation might not be available at the application, it has been specified that the evaluation report shall be made available to the Competent Body as soon as possible after the application and every two years in order to demonstrate compliance during the award period.
- Furthermore for companies having an EMAS registration and/or ISO 1400 certification are proposed to be deemed to comply with this requirement. However, considering that ISO 14001 does not cover integrally all the aspects covered by EMAS, in case of ISO 14001 certification it has been specified that a report should be joined to the application.
- In the final version, the wording "as soon as possible" has been replaced by within 2 years as suggested by a CB during the last EUEB.

3.1.2 Criterion 2: - Staff training

Proposal for criterion 2: - Staff training

- a) The tourist accommodation shall provide information and training to the staff (including subcontracted external staff), including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. In particular, the following aspects shall be included on the staff training:
- i. The environmental policy and action plan of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation.
 - ii. energy saving actions in relation to lights, air conditioning and heating systems when the staff leave the room or windows are opened.
 - iii. water saving actions in relation to leaks checking, watering, changes of sheets and towels frequency and backwashing pool procedure.
 - iv. chemical use minimisation actions in relation to chemical products for cleaning, dishwashing, sanitising, laundry and other special cleaners (e.g. swimming pool backwashing) which shall be used only where they are necessary and if information available, the consumption limits of the mentioned products shall be those indicated on the packaging or recommended by the producer.
 - v. waste reduction and separation actions in relation to disposable items and disposal categories.
 - vi. environmentally preferable means of transport available to staff.
 - vii. according to criterion 3, the relevant information that staff is required to provide to guests.
- b) Adequate training shall be provided to all new staff within four weeks of starting employment and an update on the above aspects 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

Proposal for criterion 2: - Staff training

indication of which staff have received what training and when. The date and types of the staff training shall be recorded as evidence that this training update has taken place.

Rationale of Proposed Criterion text

- EMAS BEMP report recommends that sustainability issues are included in basic training for all levels of staff, to highlight the importance of ensure waste reduction and water and energy minimisation.
- The proposed criterion includes a section about ensuring staff awareness of the EU Ecolabel. This has a number of purposes: (1) staff will have a greater understanding of the importance of the environmental actions taken by the tourist accommodation; and (2) staff will be able to respond to any guest queries about the EU Ecolabel.
- It was also suggested during this revision that the criterion specifies that existing staff are provided with an update of environmental training (rather than repeating the same training routine) at least once a year
- As a result from last comments received after AHWG2 (See section 5 for stakeholder comments), the text was simplified in order to allow some flexibility to applicants and to not repeat the requirements already mentioned along the criteria set. Instead, a text specifying that information and training to the staff shall be done in accordance with the mandatory and applicable optional criteria in this EU Ecolabel was introduced.
- In addition, a requirement on chemical use minimisation actions was introduced at TR3.0. This is an adapted version of current criterion 17. Disinfectants (See annex I for current criteria), which is considered to be difficult to verify. It is suggested to extend the scope to other type of chemicals and to include this requirement under Staff training criterion, since that the cleaning staff generally carries out this type of activities.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- Several stakeholders asked to specify that staff shall know and be able to give information about locally available means of transport for guests. Against this, in TR4.0 it is suggested to introduce a more general text to link staff training to information to guest criterion.
- No changes have been introduced since criteria published in TR4.0.

Rationale of proposed "Assessment and verification"

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

3.1.3 Criterion 3: - Information to guests

Proposal for criterion 3: - Information to guests

- a) The tourist accommodation shall also provide information to the guests, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional

Proposal for criterion 3: - Information to guests

criteria in this EU Ecolabel. That information shall be actively given to the guests in oral or written form at the reception or in-room and shall include, in particular, the following aspects:

- i. environmental policy of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation;
 - ii. energy saving actions in relation to lights, air conditioning and heating systems when the guests leave the room and/or windows are opened;
 - iii. water saving actions in relation to leaks checking, and changes of sheets and towels frequency;
 - iv. waste reduction and separation actions in relation to disposable items, disposal categories and items that shall not be disposed of with the waste water. A poster which would give advices to reduce shall be displayed it in the breakfast room;
 - v. environmentally preferable means of transport available to guests;
 - vi. the tourist accommodation shall provide information to guests on available local touristic points of interest, local guides, local restaurants, markets, craft centres to guests.
- b) Guests shall be given a questionnaire, via internet or at premises, asking about their views on the general environmental aspects of the tourist accommodation listed in point a) and their overall satisfaction with the facilities and services of the tourist accommodation. A clear procedure which records customer comments, complaints, replies given and corrective actions taken shall be in place.

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

Rationale of Proposed Criterion text

- The criterion is in line with EMAS BEMP report which is to encourage and facilitate environmentally responsible behaviour and activities, and provides environmental education for guests through on-site activities and courses.
- As a result from comments received after AHWG2 the text was simplified in order to allow some flexibility to applicants and to not repeat the requirements already mentioned along the criteria set. Instead a text specifying that information to guests shall be done in accordance with the mandatory and applicable optional criteria in this EU Ecolabel was introduced.
- It was specified that information shall be actively given to the guests in oral and/or written form at the reception and/or in-room. This could include oral presentation and/or other methods – e.g. in a welcome folder in guest rooms, via signs in rooms and common areas. The information shall include the main aspects and actions to promote a responsible behaviour from guests and to make them aware of that their help is needed to comply with criteria (e.g. towels reuse information) etc.
- In addition to waste sorting information (available containers/bins at the accommodation), in order to facilitate wastewater treatment, at TR3.0 was introduced that guest shall be informed on waste that shall not be disposed of with the wastewater to prevent the

sewage blockage this is in line with current criterion M15. Correct waste water disposal and is related to proposed criterion on waste sorting (see section 3.4.3).

- Several stakeholders suggested including requirements on logo visibility through website and mandatory ECAS registration. It is a common practice for tourist accommodation sites to email guests with details of bookings etc. These methods of communication could be used to include information on the EU Ecolabel logo, licence number and the environmental policy with the aim to promote the EU Ecolabel and to raise awareness on the environmental policy of the accommodation. However, the possibility of including a mandatory criterion on this has been discarded as the regulation does not oblige the applicant to display the logo in the product/service.
- Finally it was proposed to maintain the requirement on guest questionnaire(s) as a minimum on the environmental aspects and on a general satisfaction with the facilities and services of the tourist accommodation. It is proposed that questionnaires are given either at reception or via internet and that a clear procedure which records customer comments, complaints and corrective actions is put in place by the service provider.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- In TR4.0, minor changes have been introduced as a result to stakeholder feedback to change reception to premises at paragraph b) since printed questionnaires are given at reception only in campsites while they are left in accommodation units in hotels and apartments. In addition, the requirement on provision of information to guests on local touristic points of interest, local guides, local restaurants, markets, craft centres to guests has been transferred from optional criteria to this mandatory requirement as suggested by a stakeholder. This type of actions does not imply a burden to applicants while its potential social/environmental benefits associated are relevant. Furthermore, as requested by a Competent Body, considering the relevant environmental footprint associated to food waste a requirement on displaying specific advice on reducing food waste has been introduced.
- No changes have been introduced since criteria published in TR4.0.

Rationale of proposed "Assessment and verification"

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

3.1.4 Criterion 4: General maintenance

Proposal for criterion 4: - General maintenance

Preventative maintenance of appliances/devices shall be carried out at least yearly, or more often if required by law or relevant manufacturer's instructions. The maintenance shall include the inspection of possible leakage and assurance of the proper functioning at least for energy equipment (e.g. heating, ventilation and air conditioning (HVAC) appliances, refrigeration systems...) and water equipment (e.g. plumbing fixtures, irrigation systems, etc.) at the accommodation premises.

Appliances using refrigerants covered by the Regulation (EU) No 517/2014 of the European Parliament and of the Council of 16 April 2014 on fluorinated greenhouse gases

Proposal for criterion 4: - General maintenance

(²), shall be inspected and maintained as follow:

- i. for equipment that contains fluorinated greenhouse gases in quantities of 5 tonnes of CO₂ equivalent or more, but of less than 50 tonnes of CO₂ equivalent: at least every 12 months; or where a leakage detection system is installed, at least every 24 months;
- ii. for equipment that contains fluorinated greenhouse gases in quantities of 50 tonnes of CO₂ equivalent or more, but of less than 500 tonnes of CO₂ equivalent: at least every six months or, where a leakage detection system is installed, at least every 12 months;
- iii. for equipment that contains fluorinated greenhouse gases in quantities of 500 tonnes of CO₂ equivalent or more: at least every three months or, where a leakage detection system is installed, at least every 6 months.

All maintenance activities have to be registered in a specific maintenance register, specifying the approximate amounts of the water leaking from the water supply equipment.

Assessment and verification: The applicant shall provide a declaration of compliance, together with a brief description of the maintenance programme, details of the persons/companies carrying out the maintenance and the maintenance register.

Rationale of Proposed Criterion text

- EMAS BEMP report and LCA recommend to “ensure that all equipment is maintained through appropriate periodic inspection”. In addition, the environmental scheme Tripadvisor Greenleades scheme [Tripadvisor Greenleaders (2013)], has a criterion on preventative maintenance plan which checks, at least quarterly, that building energy and water equipment (e.g. HVAC, lighting, plumbing fixtures, irrigation systems, etc.) are functioning properly.
- Against this background, in TR3.0 it was suggested to partially align to Tripadvisor Greenleaders and the scope of the criterion is extended to other type of appliances. However the maintenance is requested to be carried out at least yearly instead of quarterly as requested in Tripadvisor Greenleaders as the check every 3 months must be too much a burden for applicants.
- Finally, the Regulation (EC) No 842/2006 of the European Parliament and of the Council on fluorinated gas has been replaced by updated Regulation No 517/2014.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- A stakeholder mentioned that plumbing and faucets might not be on the same contract as heating or air conditioning appliances. However the criterion as it is proposed does not prevent applicant to have more than one contract to carry out the maintenance. In addition, regular inspection and maintenance of water system "leak points" and appliances is a benchmark in SRD EMAS on tourism sector. Against this, the criterion continues to be proposed as suggested at TR3.0. However wording has been slightly modified to be further aligned with Tripadvisor Greenleades scheme [Tripadvisor Greenleaders (2013)] and to

² OJ L 150, 20.5.2014, p.195

give a higher degree of flexibility to applicants, aiming to recognise that different types of energy/water equipment might be present at the different accommodation types.

- No changes have been introduced since criteria published in TR4.0.

Rationale of proposed "Assessment and verification"

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

3.1.5 Criterion 5: Consumption monitoring

Proposal for criterion 5: Data collection

The tourist accommodation shall have procedures for collecting and monitoring data monthly or at least yearly, on the following aspects as a minimum:

- i. Specific energy use (kWh/guest night and/or kWh/m² (of indoor area)year)
- ii. Percentage of final energy use met by renewable energy generated on site (%)
- iii. Water consumption per guest-night (litres/guest-night) including the water used for irrigation (if applicable) and any other activities related to water consumption
- iv. Waste generation per guest-night (kg/guest-night). Food waste shall be monitored separately^(a)
- v. Consumption of chemical products for cleaning, dishwashing, laundry, sanitising and other special cleaners (e.g. swimming pool backwashing) (kg and/or litres / guest-night) specifying if they are ready-to-use or undiluted.
- vi. Percentage of ISO Type I ecolabelled products (%) used from the applicable optional criteria in this EU Ecolabel

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the collecting and monitoring procedures. The tourist accommodation shall report a short summary of the data collected for the above-listed consumption parameters together with the internal evaluation report mentioned in criterion 1, which shall be made available to the competent body as soon as possible after the application, and every two years.

^(a) Applicable if food service is provided and local waste management facilities permit the separate collection of organic waste.

Rationale of Proposed Criterion text

- Relevant BEMPs includes: “Undertake an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficient improvement options. In addition, EMAS BEMP report suggest that “appropriate environmental indicators are measured at the process level and associated with best practise techniques”.
- The Nordic Swan environmental label also has a criterion relating to energy and water consumption data and requires measurements for: Water (litres/guest-night) and Energy (Electricity and heating consumption per year and square metre or Electricity and heating consumption per year and guest night).
- With the aim to simplify the criteria set, the proposed criterion merges the two current criteria 28: Energy and water consumption data and 29: Other data collection. (See annex I for current criteria).

- In addition, with the aim to promote synergies with EMAS, at TR3.0 it was suggested to partially harmonize the indicators to those set by the Sectoral Reference Document on Tourism sector and with this purpose Percentage of ISO Type I ecolabelled products was added,
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- A Competent Body mentioned that it was a difficult work to require this data and compile it and that this information is not relevant for competent bodies.
- Although CBs do not use data, the data collection and evaluation is one of the tools that applicants use in order to set consumption targets. Frequent collection for its internal management is very relevant then it is suggested to keep the frequency at suggested in TR3.0. Against this, no changes in the frequency of the collection of data have been introduced. However, in order to diminish the burden on data provision to Competent Bodies, it is suggested to require a short summary of the data collected which shall be provided together with internal evaluation report of criterion 1. This means that a short summary of the data collection is provided as soon as possible after the application and every two years in order to demonstrate compliance during the award period.
- A Competent Body suggested monitoring food waste in particular introducing criterion on weighting the food waste once a week or once a month. They claimed that the National Council for Packaging assessed that 80% of the environmental footprint of food is due to the manufacturing process and not the packaging. Regarding that this is a mandatory criterion and that there is no evidence on the share of TAS doing this practice this has been introduced as a preference instead of an obligation.
- No changes have been introduced since criteria published in TR4.0.

Rationale of proposed "Assessment and verification"

- For the verification of this criterion, a declaration of compliance and a description of the procedures for collecting the information are requested.
- In addition, with the aim to recognise that on application there might not be information collected by the applicant, it is suggested to provide a summary of the data together with the internal evaluation report and the environmental report mentioned in criterion 1.
- In the final version, the wording "as soon as possible" has been replaced by within 2 years as suggested by a CB during the last EUEB in June 2016.

3.2 Mandatory criteria related to energy

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

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

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

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

- i. be a high efficiency cogeneration unit as defined by Directive 2012/27/EU of the European Parliament and of the Council ⁽³⁾, or
- ii. have seasonal space heating energy efficiency and/or GHG emission limits in accordance with the values in the following tables, calculated as stated in the Commission Decision 2014/314/EU ⁽⁴⁾:

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

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

- b) Local space heating appliances installed within the duration of the EU Ecolabel licence shall comply with the minimum seasonal space heating energy efficiency set out in Commission Regulation (EU) 2015/1185 ⁽⁵⁾ or in Commission Regulation (EU) 2015/1188 ⁽⁶⁾.
- c) Water heating appliances installed within the duration of the EU Ecolabel licence shall have at least the following relevant energy efficiency indicators:

⁽³⁾Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012 on energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC (OJ L 315, 14.11.2012, p. 1).

⁽⁴⁾Commission Decision 2014/314/EU of 28 May 2014 establishing the criteria for the award of the EU Ecolabel for water-based heaters (OJ L 164, 3.6.2014, p. 83).

⁽⁵⁾Commission Regulation (EU) 2015/1185 of 24 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for solid fuel local space heaters (OJ L 193, 21.7.2015, p. 1).

⁽⁶⁾Commission Regulation (EU) 2015/1188 of 28 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for local space heaters (OJ L 193, 21.7.2015, p. 76).

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

<i>Water heater type</i>	<i>Energy efficiency indicator</i>
All water heaters with a declared load profile ≤ S	Energy Class A ^(a)
All water heaters except heat pump water heaters, with a declared load profile > S and ≤ XXL	Energy Class A ^(a)
Heat pump water heaters with a declared load profile > S and ≤ XXL	Energy Class A+ ^(a)
All water heaters with a declared load profile > XXL (3XL and 4XL)	Water heating energy efficiency ≥ 131% ^(b)

^(a) As defined in Annex II to Commission Delegated Regulation (EU) No 812/2013 ⁽⁷⁾

^(b) As defined in Annex VI to Commission Regulation (EU) No 814/2013⁽⁸⁾

d) Existing cogeneration units shall comply with the definition of high efficiency in Annex III to Directive 2004/8/EC of the European Parliament and of the Council ⁽⁹⁾ or in the Directive 2012/27/EU if it was installed after 4th December 2012.

e) Existing hot-water boilers fired with liquid or gaseous fuels as defined in the Council Directive 92/42/EEC ⁽¹⁰⁾ shall comply with efficiency standards at least equivalent to three stars as stated in the Directive. The efficiency of boilers excluded from Directive shall comply with the manufacturer's instructions and with national and local legislation on efficiency, but for such existing boilers (with the exception of biomass boilers) efficiency lower than 88% shall not be accepted.

Assessment and verification: For requirements a, b) and c) the license holder shall inform the competent body about the new installation within the duration of the EU Ecolabel licence of relevant appliances and provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the space and water heaters appliances indicating how the required efficiency is met. EU Ecolabel water-based heaters products shall be deemed to comply with requirement a).ii. Other ISO type I label products satisfying any of the requirements listed in points (a) to (e) shall be deemed to comply. Where EU Ecolabel water-based heaters products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing

⁽⁷⁾Commission Delegated Regulation (EU) No 812/2013 of 18 February 2013 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of water heaters, hot water storage tanks and packages of water heater and solar device (OJ L 239, 6.9.2013, p. 83).

⁽⁸⁾Commission Regulation (EU) No 814/2013 of 2 August 2013 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for water heaters and hot water storage tanks (OJ L 239, 6.9.2013 p.162).

⁽⁹⁾Directive 2004/8/EC of the European Parliament and of the Council of 11 February 2004 on the promotion of cogeneration based on a useful heat demand in the internal energy market and amending Directive 92/42/EEC (OJ L 52, 21.2.2004, p. 50).

⁽¹⁰⁾Council Directive 92/42/EEC of 21 May 1992 on efficiency requirements for new hot-water boilers fired with liquid or gaseous fuels (OJ L 167, 22.6.1992, p. 17).

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

that it was awarded in accordance with the Commission Decision 2014/314/EU. Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate or packaging label and indicate the ISO type I label requirements listed in points (a) to (e).

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

Rationale of Proposed Criterion text

- For space water-based heaters, the energy efficiencies thresholds match the ones within the EU Ecolabel criteria for water-based heaters. In the case of heat pumps, it is proposed to set a criterion on GHG emissions according to the EU Ecolabel criterion for water-based heaters. This criterion is formulated as a maximum TEWI value, which factors in both seasonal space heating energy efficiency and leakages and end of life of the refrigerant. Hence, the TEWI formula works as mechanism to reward those heat pumps using low GWP refrigerants with a lower threshold for seasonal space heating energy efficiency.
- The value TEWI of 150 gCO₂/kWh heat output corresponds to heat pumps that
 - i. fulfil the RES Directive criterion to be considered as renewable source (SCOP = 2.6 for the average climate conditions of Strasbourg), and;
 - ii. uses CO₂ (GWP = 1) as refrigerant in a ratio charge (kg) /heat output (kW) equal to 1/3.
- In order to simplify the assessment and verification, for both applicants and Competent Bodies, a second option was proposed at TR2.0 based on seasonal space heating energy efficiency and a bonus-malus as a function of the GWP of the refrigerant.

Table 5. Proposed ns thresholds and equivalent TEWI values

GWP	ns (%) for TEWI=150 gCO₂/kWh	Proposed ns thresholds (%)	TEWI for the proposed ns
[0 – 500]	103 - 107	107	143 - 148.4
(500 – 1000]	107 - 110	110	144.5 - 149.4
(1000 – 2000]	110 - 119	120	137.7 - 147.4

- This option (option 1 in the criterion text) would stop penalizing higher values of GWP if there is not an upper limit in the ranges of GWP, i.e. for GWP > 2000, the energy efficiency requested keeps constant regardless the GWP value of the specific refrigerant used in the heat pump. Therefore, it is proposed to set the TEWI option (option 2 in the criteria text) mandatory for those heat pumps using refrigerants with GWP > 2000.

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- For water heating boilers, the thresholds are based on Regulation (EU) No 814/2013, which provides indicative benchmarks for the best-performing water heaters and hot water storage tanks available on the market at the time this Regulation came into force.
 - Against this background, it is apparent that those heaters whose declared load profile are higher than S, are more energy efficient. Particularly M and larger load profiles' benchmarks are closer to the upper limits of the A energy class ranges, due to a larger penetration of heat pumps and solar technologies in this market segment. Therefore, the following distinctions are needed for a fair selection:
 - Declared load profile \leq S: energy class A
 - Declared load profile $>$ S and \leq XXS except heat pumps: boilers: energy class A
 - Declared load profile $>$ S and \leq XXS heat pumps: energy class A+
 - This criterion was proposed to be revised to be fully aligned to the main product policies ruling on heating appliances. In TR3.0, local space heating appliances have been included, completing the range of heating products currently ruled by Ecodesign regulations. These appliances use direct heat instead a heat transfer fluid, and they are covered by the Commission Regulation (EU) 2015/1185 (5) for solid fuel local space heaters, and the Commission Regulation (EU) 2015/1188 (6) for gaseous and liquid fuel local space heaters. The requirements within these regulations are scheduled to be in force in January 2022 and in January 2018 respectively. Therefore, the criterion proposal is aimed to underpin the phasing-in of the Ecodesign thresholds.
 - All received comments and responses with regard to TR3.0 are gathered at the section 5.
 - A stakeholder mentioned that paragraphed C might not apply to professional equipment, only for electric water heaters, and solar thermodynamics and that gas-water heater are not concerned.
 - As a result, in TR4.0, It is relevant to note that energy classes only cover water heaters up to 70 kW heat output, i.e. XXL and smaller load profiles, hence, it is proposed to set a specific threshold expressed as water heating energy efficiency for heaters with a declared load profile $>$ XXL, aligned to the benchmark indicated in the Regulation (EU) No 814/2013 (130%)..
 - No changes have been introduced since criteria published in TR4.0.

Rationale of proposed "Assessment and verification"

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

- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates. In addition, the applicant is requested to indicate the ISO type I label requirements that are like the ones mentioned in the criteria to facilitate verification when other type of labels are used as requested by a Competent Body. No changes have been introduced since criteria published in TR4.0.

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

Proposal for criterion 7: Energy efficient air conditioning and air-based heat pumps appliances	
Household air conditioning and air-based heat pumps appliances installed within the duration of the EU Ecolabel licence shall have at least the following relevant energy classes as defined in Commission Delegated Regulation (EU) No 626/2011 ⁽¹¹⁾ :	
Type	Energy efficiency class (cooling / heating)
Monosplit < 3kW	A+++ / A+++
Monosplit 3-4 kW	A+++ / A+++
Monosplit 4-5 kW	A+++ / A++
Monosplit 5-6 kW	A+++ / A+++
Monosplit 6-7 kW	A++ / A+
Monosplit 7-8 kW	A++ / A+
Monosplit > 8kW	A++ / A++
Multi-split	A++ / A+
<p>Note: This criterion applies to electric mains-operated air conditioners and air-based heat pumps with a rated capacity of ≤ 12 kW for cooling, or heating, if the product has no cooling function. This criterion does not apply to appliances that use non-electric energy sources; and appliances of which the condenser - or evaporator- side, or both, do not use air for heat transfer medium.</p> <p><i>Assessment and verification: The license holder shall have to inform the competent body about the new installation within the duration of the EU Ecolabel licence of above mentioned appliances and provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system indicating how the required efficiency is met.</i></p>	

⁽¹¹⁾Commission Delegated Regulation (EU) No 626/2011 of 4 May 2011 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of air conditioners (OJ L 178, 6.7.2011, p. 1).

Rationale of Proposed Criterion text

- Tipten website, which is a consumer search tool for energy efficient appliances on the market, was consulted in order to determine the highest energy classes for different types of air conditioners. The highest energy classes available on the market are listed in the table below. In order to facilitate compliance to the criterion, this table was included in the criterion text in TR2.0.

Table 6. Energy efficiency class for air conditioners

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

Source: Tipten, updated October 2014

- This criterion scope has been extended to the range of products within Commission Delegated Regulation (EU) No 626/2011, i.e. air-based heat pumps. A clarification about the exclusions aligned to this regulation was added in TR3.0.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.2.3 Criterion 8: Energy efficient lighting

Proposal for criterion 8: Energy efficient lighting

- a) At the date of the EU Ecolabel licence award:
 - i. At least 40% of all lighting in the tourist accommodation shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012 of 12 July 2012 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of electrical lamps and luminaires ⁽¹²⁾.
 - ii. At least 50% of lighting that is situated where the lamps are likely to be

⁽¹²⁾ OJ L 258, 26.9.2012, p.1

Proposal for criterion 8: Energy efficient lighting

turned on for more than five hours a day shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012⁽¹²⁾.

- b) In maximum of 2 years from the date of the EU Ecolabel licence award:
- i. At least 80% of all lighting in the tourist accommodation shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012⁽¹²⁾.
 - ii. The 100% of lighting that is situated where the lamps are likely to be turned on for more than five hours a day shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012⁽¹²⁾.

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

Assessment and verification: The applicant shall provide to the competent body a two written reports indicating the total amount of lamps and luminaires suitable to use energy-saving lighting, operating hours and amount of energy saving lamps and luminaires with at least energy efficient light lamps and luminaires of Class A as defined in Commission Delegated Regulation (EU) No 874/2012⁽¹²⁾. The reports shall also include the explanation on the impossibility to substitute lamps and luminaires where physical characteristics do not allow use of energy-saving lamps and luminaires. First and second reports shall be provided at the application date and within a maximum of 2 years from the date of the award respectively.

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

Rationale of Proposed Criterion text

- EMAS BEMP report reveals that lighting represents a 12% of the total energy consumption of a tourist accommodation. The best environmental practice for lighting is: "To install zoned and appropriately sized compact fluorescent and LED lighting with intelligent control based on motion, natural-light and time."
- A stakeholder feedback suggested only requesting energy efficient lamps and hence letting it to applicant choose which technology to use. They also suggested setting the level to minimum A+ (which defacto is asking for LED lamps).
- At the AHWG2 there were divided views. While several stakeholders do not see a problem in complying with this criterion (they even mentioned they have a well return of the investments made), other stakeholders have problem implementing this criterion especially in big hotels, however they welcomed the phase in period for this criterion. In addition, a Competent Body suggested that it would be better to require 40% of the light bulbs Class A when company does the EU Ecolabel application, instead that 1 year after. On this way, Competent Bodies only should to do an extra verification 2 years from the date of the EU Ecolabel licence award.

- The report on Energy labelling produced by LightingEurope [LightingEurope, 2013], shows indicative example of different types of lamps for each energy class according to the Commission Delegated Regulation (EU) No 874/2012. See the Figure 4.
- Against this background, the specific mention of LED lighting was omitted as LED lamps are included in the scope of the Commission Delegated Regulation (EU) No 874/2012. It is proposed to require at least class A, instead of a prescriptive class A, as this would allow higher efficient classes to be used. In addition in TR3.0, with the aim to reduce the burden on verification first requirement was proposed to be in place on application instead of 1 year after the date of award.

Figure 4. Energy efficiency classes for lamps and LED modules

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

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

- All received comments and responses with regard to TR3.0 are gathered at the section 5
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

- For the assessment and verification of this criterion. The applicant shall provide to the competent body a two written reports, first one on application and the second one after two years with the following details:
 - the total amount of lamps and luminaires
 - the operating hours
 - the amount of energy saving lamps and luminaires with at least energy efficient light lamps and luminaires of Class A as defined in Commission Delegated Regulation (EU) No 874/2012⁽¹²⁾, and

- the explanation on the impossibility to substitute lamps and luminaires where physical characteristics do not allow use of energy-saving lamps and luminaires.

3.2.4 Criterion 9: Thermoregulation

Proposal for criterion 9: Thermoregulation

The temperature in every common area (for example restaurants, lounge areas, and conference rooms) shall be individually regulated within the following designated range

- i. Common area temperature set point, while in cooling mode, is set at or above 22°C (+/- 2°C on customers' request) for the duration of the summer.
- ii. Common area temperature set point, while in heating mode, is set at or below 22°C (+/- 2°C on customers' request) for the duration of the winter.

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

Rationale of Proposed Criterion text

- As a response from stakeholder request, in TR4.0, the criterion on thermoregulation (See section 3.7.6) has been split in two parts. The requirements addressing temperature control in common areas has been transferred to mandatory criteria. However in order to recognise its obligatory character and that several stakeholders consider 22 degrees to be strict, "+/- 2°C, on customers' request" has been added for the mandatory criteria. The requirement for guest rooms temperature control remains as optional and the points allocated for this part have been increased in order to recognise the difficulties to meet this criterion.
- No changes have been introduced since criteria published in TR4.0.

3.2.5 Criterion 10: Automatic switching off HVAC and lighting

Proposal for criterion 10: Automatic switching off of HVAC and lighting

- a) HVAC (heating, ventilation and air conditioning) systems/appliances installed within the duration of the EU Ecolabel licence shall be equipped with an automatic switch off when windows are opened and when guests leave the room.
- b) Automatic systems (e.g sensors, centralized key/card...) which turn the all the lighting off when guests leave the room, shall be installed at construction and/or renovation of all new and/or renovated rental accommodations/guest rooms within the duration of the EU Ecolabel licence.

Note: Small accommodations (up to 5 rooms) are exempt.

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

Rationale of Proposed Criterion text

- EMAS BEMP report outlines that information should be provided to guests/staff to encourage switching off of air conditioning and lights where appropriate. In addition, automatic switching off of heating and cooling systems and intelligent lighting control are encouraged as a method of saving energy. However, it is recognised that for small

enterprises where automatic lighting control in rooms may not be practical, the best practice is to install appropriately positioned signs reminding guests to switch off lights (as required in EU Flower criteria for accommodation: EC, 2009)."

- In TR3.0, the proposed criterion merges the current criteria. M7. Switching off heating or air conditioning and M8. Switching off lights (See annex I for current criteria) into a single criterion on with the aim to simplify the criteria set. The requirements on information to guest/staff were placed on the appropriate criteria for this purpose and in order to recognise that investment is needed for this type of automatic systems the mandatory requirement only request these systems for new installations.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- A stakeholder mentioned: *"this requirement is too costly for small establishments such as B & Bs (maximum 5 rooms): in general, the owner works alone and verifies rooms and lamps / appliances every day after the departure of guests (this is the same person who also takes care of the household)"*
- In addition a Competent Body, with regard to paragraph b stated: *"B) The requirement shall not be mandatory or only be valid if the technical possibility is given (e.g. sufficient wiring) and the installation does not lead to a non affordable burden (relevant esp. for small and micro enterprises). Additionally key cards are more unsafe than normal keys and hotels are starting to rebuilding it again to normal keys due to criminal attacks on the key card system."*
- Against this background, in TR4.0, it is finally proposed to exempt small accommodations of the compliance with this criterion based on the feedback with regard to the economic burden for small accommodations and that EMAS BEMP report highlights difficulties for this type of enterprises. The allowance also recognises that smaller enterprises have less impact compare to big accommodations.
- In addition a slightly wording amendment has been introduced as a result of a stakeholder request: *"within the duration of the license" is not good enough. Automatic turn off shall be installed in all new rooms and when renovated, and not after.*
- No changes have been introduced since criteria published in TR4.0.

Rationale of proposed "Assessment and verification"

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

3.2.6 Criterion 11: Outside heating and air conditioning appliances

Proposal for criterion 11: Outside heating and air conditioning appliances

No outside heating or air conditioning appliances shall be used by the tourist
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Proposal for criterion 11: Outside heating and air conditioning appliances

accommodation.

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

Rationale of Proposed Criterion text

- Although no specific guidance on outside heating appliances where provided by EMAS BEMP report/LCA there is a clear relation with the energy consumption. It is generally seen by stakeholders as a waste of energy.
- Stakeholders were invited to choose either Option 1 (allow outside heating appliances which are powered by renewable energy) or Option 2 (ban all outside heating appliances). Most of the respondents that provided feedback favoured Option 2. The arguments in favour of Option 2 included: a) outdoor heating appliances are a waste of energy, b) that alternatives are available e.g. blankets and c) image incongruence: the use of outside heating would undermine the image of EU Ecolabel, and it would be hard to communicate to those guests who choose an Ecolabelled accommodation over non-labelled alternatives.
- In addition, a written feedback received after AHWG2 suggested extending the scope to outside air conditioning systems. (See section 5 for stakeholder comments)
- Against this background, at TR3.0 it was proposed that the criterion adopts option 2: total restriction of this type of systems, and to include air conditioning within the scope of this criterion
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.2.7 Criterion 12: Procurement of electricity from a renewable electricity supplier

Proposal for criterion 12: Procurement of electricity from a renewable electricity supplier

a) In case there are **1 to 4 suppliers of individual green tariffs offering 50%** of the electricity from renewable energy sources **or of separate GOs certificates** where the

Proposal for criterion 12: Procurement of electricity from a renewable electricity supplier

accommodation is located:

The tourist accommodation shall contract at least 50% of its electricity from renewable energy sources, as defined in Directive 2009/28/EC of the European Parliament and of the Council⁽¹³⁾. For this purpose:

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

Or

Alternatively the minimum 50% renewable energy can also be acquired through the **unbundled purchase** of guarantees of origin (GOs) as defined in Article 2(j) of Directive 2009/28/EC which are traded in line with the Principles and Rules of Operation of the European Energy Certificate System (EECS). For this alternative, the following conditions shall be met:

- i) The national regulations of both the exporting and the importing country provide domain protocols that are accredited by the Association of Issuing Bodies (AIB) under the Principles and Rules of Operation of the EECS in order to avoid double counting in case the customer opts for an unbundled purchase of GOs.
- ii) The amount of GOs acquired through unbundled purchased does match with the applicant's electricity consumption during the same period of time.

b) In case there are **at least 5 suppliers of individual electricity tariffs offering 100%** of the electricity from renewable energy sources where the accommodation is located, the tourist accommodation shall contract 100% of its electricity from renewable energy sources through an individual green tariff. This requirement is fulfilled either in case the overall fuel mix marketed by the supplier is disclosed as being 100% renewable or in case the product fuel mix of the purchased tariff is disclosed as being 100% renewable.

Note: Tourist accommodations falling outside a) or b) cases are exempt. Only suppliers offering the power and voltage demanded by the Tourist Accommodation are accounted for the minimum number of suppliers mentioned in cases a) and b).

Assessment and verification

The applicant shall provide a declaration from (or the contract(s) with) the electricity/guarantees of origin supplier(s) indicating the nature of the renewable energy source(s) and the percentage of electricity supplied that is from a renewable source and the list of green tariff suppliers providing green electricity where the accommodation is located. In addition, for applicants using the unbundled purchase in point a), declarations from the guarantees of origin supplier showing compliance with above conditions

⁽¹⁴⁾ Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC (OJ L 140, 5.6.2009, p. 16).

Proposal for criterion 12: Procurement of electricity from a renewable electricity supplier

mentioned in point a) shall be provided.

Applicants that do not have access to any suppliers offering the electricity tariff described above or guarantees of origin where the accommodation is located shall provide documentary evidence of the lack of access to suppliers of green tariff and unbundled GOs.

According to Article 2(a) of Directive 2009/28/EC, renewable energy 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.

Rationale of Proposed Criterion text

- With regard to the electricity generated from renewable energy sources. The scenarios of the different European countries are very disparate. The EU -28 average share of electricity from renewable sources in 2014 was just above 27% of the total electricity generated (Eurostat, 2014).
- In order to make possible to choose specific types of electricity, accountancy systems have been established. States and regulators have databases to track which electricity has been put on the grid, and to attribute that electricity to specific electricity sellers or electricity consumers. According to the EU guideline 2009/28/EC (RES Directive), all European Union member states are required to establish a national registry for Guarantees of Origin (GOs) for electricity from renewable energy sources.
- The EECs (European Energy Certificate System) is a standardization system for the European Guarantees of Origin (GOs) based on structures and procedures which ensure the reliable operation of international certificate schemes. The system registers what has been put on the grid. For each MWh produced, the producer gets a 'certificate' which then is cancelled on behalf of a specific consumer'. States that are members of the AIB (Association of Issuing Bodies) and adhere to the EECs system are easily able to trade GOs cross-border with no risk of double counting, claiming or attributing (*a MWh of RES-E is allocated to two or more different consumers or their suppliers*). (For more information see: http://www.aib-net.org/portal/page/portal/AIB_HOME)
- The recently published report RES DISS II [RES-DISS II, (2015)] produced to support Competent Bodies in improving their GOs and disclosure systems, stated that all the 32 domains studied have some sort of RES-GO system in place with Competent Bodies assigned for issuing, transferring and cancelling GOs. However they highlighted that not all meet the requirements of the RES Directive. For instance, in Poland, GOs are issued for internal use but they are not cancelled, in the case of Portugal the RES-GO system is created by law but not operational and in Slovakia although the GO are distinguished from other certificates and only used for disclosure, they are not electronic certificates.

Currently, there exist two routes **for consumers to buy green power**:

1. Green tariffs. Renewable electricity products offered via a regular electricity seller. Suppliers need to cancel Guarantees of Origin to cover all of their green electricity sales (tariff).

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

However, several stakeholders mentioned that the level of investment associated to switching to green suppliers at their countries may impose an economic burden that can reach 50% more than current investment on GOs. In addition, many of the suppliers that appeared recently on the market does not offer tariffs to suitable to accommodations as they are only available for domestic use.

2. Separate purchase of tracking certificates or unbundle purchase of GOs. This means that the electricity consumer buys the required tracking instruments separately to the electricity contract. In this case, the electricity consumer has 2 separate contracts. One with a regular electricity seller who offers the national electricity supply and a second contract with a seller of Guarantees of origin for renewable electricity.

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

Best practices across the accommodation sector:

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

Benchmarks of excellence in EMAS BEMP report are:

- The equivalent of **50 %** of the accommodation's annual energy use is generated by on-site renewable sources, or by verifiably additional off-site renewable energy sources.
- **100 %** of electricity is from traceable renewable electricity sources not already accounted for by another organisation or in the national electricity average generating mix, or that are less than two years old
- On the other hand, electricity ecolabels could be a way to prove additionality and to go one step further. CEER advice on customer information on sources of electricity report [CEER, (2015)] highlights that number of private renewable electricity labels were introduced into the market with the aim of helping customers finding the appropriate electricity product for their own particular interest. However, The assessment criteria used by labels are of uneven quality, especially in respect to sustainability issues. Each label system has its own range of criteria which can significantly differ from other labels. Each label guarantees a particular set of properties and additionalities based on self-defined criteria, making it difficult to compare them among each other. Despite this, CEER report suggested that for customers who feel that having an electricity contract based on GOs

does not in itself respond fully to their expectations, labels can be a possible solution, under certain circumstances. Widely used standards, such as Greenhouse Gas Protocol and LEED, encourage consumers to buy labelled electricity. In addition, there is a wide variety ecolabels in Europe (see optional criterion, section 3.7.11).

- Against this background, in TR3.0 it was suggested to have a mandatory requirement on procurement of 50% RES electricity in order to recognise that some countries might have difficulties to offer competitive prices of green tariffs (if available) and/or to allow the unbundle purchase. The proposal attempts to recognise the situation as it currently exists in Europe but is considered to be a first step and is in line with first benchmark of excellence in EMAS BEMP report. Wording was modified in accordance to input provided by experts on electricity market with the aim to clarify that either overall fuel mix or product fuel mix are accepted for the % of RES requested. In addition, in order to avoid the double counting of GOs risk associated to unbundle purchase, the condition on AIB accreditation of the GOs supplier was introduced for applicants going for the alternative option.
- In order to go a step further the optional criteria awards those applicants purchasing the 100% labelled electricity. More points were allocated in this criterion recognising the effort on purchasing 100% RES and the potential environmental benefit from additionalities. In addition, the proposal will probably lead, where tariffs and/or unbundle purchase are available, to the compliance of optional criteria as more points could be awarded and most of the suppliers provide a 100% green tariff where they operate. (See section 3.7.11).

All received comments and responses with regard to TR3.0 are gathered at the section 5

From NGO side they claimed:

- *To increase the threshold for 'green electricity' from 50% to 100% in those countries where 'green electricity' tariffs are offered by at least three suppliers.*
- *To allow the unbundled purchase of Guarantees of Origin only in those countries where the applicant cannot find more than three suppliers of a 'green' tariff backed by Guarantees of Origin, under the conditions that are detailed in our proposal. In that case, also 100% should be the target instead of the proposed 50%.*

In addition the provided the following indicative information on tariff switching cost (*Research results of 100% 'green' offers covering the average annual electricity consumption of a hotel in 75011 Paris, 12 kV, tariffication base, without VAT, on the official online price comparison tool of the French regulator CRE*):

- *By switching from the cheapest non-renewable tariff to the cheapest 100% 'green' offer in France, hotels with 50,000 kWh of annual consumption would pay 5 Euro more per year. Small hotels can even cut their electricity bill by around 20 Euro per year. Medium-sized hotels would pay approximately 4% more compared to the cheapest non-renewable tariff.*
- *Up to a grid connection capacity of 36 kV, the number of 100% 'green' offers is always 10, thus there is a broad enough choice of 'green' tariffs even for energy-intensive huge hotels in France.*

Furthermore, through a bilateral communication with NGOs, they expressed disagreement on claiming RES promotion through this EU Ecolabel when only 50% is purchased.

The reactions from several Competent Bodies and stakeholders on NGOs comments (See section 5 for stakeholder comments) are summarized below:

- Several CBs seriously suggested considering the mandatory 100% in the next revision and keep 50 % for now. They claimed limited access to RES of the licenceholders due to the higher prices of electricity from renewable sources. In addition they felt currently proposed criteria to set sufficient importance to the use of electricity from renewable sources as reflected in the proposed optional criterion, including a higher number of points offered. In addition, a CB compromised to follow up the uptake of the optional criteria with the aim to use the data as a basis for the proposal of 100% for next revision.
- Several licence holders claimed that although buying GOs appears to be a cheaper option in the countries where this practice is available; the increase from 50% to 100% may impose an extra economic burden that might be too much for applicants that are already investing money to comply with the whole criteria set. In addition, they mention that this criterion is already a reason of licence holders quitting the label or migrating to other certification schemes.

Majority of EUEB members agreed this approach (50% mandatory/100% optional) in EUEB June 2015. A CB suggested monitoring the uptake of the optional 100% in order to collect data with the aim to set 100% mandatory in next revision.

With regard to the unbundle purchase of GOs, the recently published Final Report “Reliable Disclosure Systems for Europe - Phase II” (RE-DISS II) emphasis that Member States should clarify the conditions under which the unbundle purchase is permitted: *European countries should clarify whether and under which conditions the use of GOs by end consumers is allowed independently from the disclosure provided by their electricity suppliers. Such use of GOs should not be based on ex-domain cancellations performed in other countries. If consumers are allowed to use GOs independently, a correction should be implemented in the disclosure scheme which compensates for any “double disclosure” of energy consumed.* While Germany does not allow the unbundle purchase, this option is very popular amongst LEED (Leadership in Energy & Environmental Design) certifiers and EU Ecolabel for Tourist Accommodation licence holders in France. (See <http://www.green-access.com/>). A high proportion of the current licence holders are using this route (unbundle purchase) to comply with current criterion.

In addition, although the tariffs offer is growing across EU as suggested by NGOs, the uptake across the accommodation sector might be still very low and would not represent 10-20% of the market on the tourism sector. SRD EMAS that was voted at the end 2015 document first benchmark on green electricity suggests the 50% RES due to the lack of information on RES share on the Tourism sector.

Against this background, in TR4.0 it is suggested to keep the 50% and to require the 100% only in cases where the RES-E offer is competitive (at least 5 suppliers access) based on:

- several stakeholders from industry and Competent Bodies expressed that in certain countries there might have difficulties to access to competitive prices of green tariffs (if available) and/or to allow the unbundle purchase.
- the 100% RES might be too much for majority of applicants that are already investing money to comply with the whole criteria set and there is high potential of losing current licence holders.
- lack of the evidence on the uptake % RES share across the accommodation sector and alignment to first EMAS Sectoral Reference Document on Tourist accommodation

benchmark. Alignment to EMAS has been relevant during the EU Ecolabel revision. To go beyond an EMAS benchmark in mandatory criteria could be too prescriptive.

With regard to the NGO request on prioritizing the green tariffs, it is suggested to keep the same approach as it was suggested in TR3.0 with the aim to keep it simple and to give flexibility to licence holders. However in order to avoid the double counting of GOs risk associated to unbundled purchase, the conditions on AIB (Association of Issuing Bodies) accreditation of the GOs supplier and that the applicant has to prove that the amount of GOs acquired through unbundled purchased do match with the applicant's electricity consumption during an identical period of time have been introduced in the revised text.. In addition, in the optional criterion (see section 3.7.11), maximum of points are awarded only if green tariff with independent ecolabel is chosen among the available options.

In addition in order to further incentivise the optional 100% RES as much as possible:

- It is suggested to increase the scored points. (see optional criterion, section 3.7.11).

In final version, minor wording amendments were introduced as a result of comments received at the EUEB (June 2016) to clarify further the different options on electricity procurement depending on the number of suppliers scenarios. No changes in the ambition level were introduced since TR4.0 publication.

Rationale of proposed "Assessment and verification"

- It is suggested that declaration/contracts from the electricity/guarantees of origin supplier(s) shall be used as a means of proof for this criterion. In addition, exempted applicants are asked to provide documentary evidence of the lack of access to suppliers of green tariff and unbundled GOs.

3.2.8 Criterion 13: Coal and heating oils

Proposal for criterion 13: Coal and heating oils

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

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

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

Rationale of Proposed Criterion text

- It is considered relevant to keep restrictions on the use of non-renewable sources of energy for heating purposes. LCA suggested energy production (power and thermal energy) is among the main burdening processes, and acidification as one of the main environmental impacts related to fuel consumption. In addition, the LCA literature review suggests that 20% contribution from renewable energy leads to a reduction of 45% of the CO₂ emissions in the operation phase.
- Additionally, EMAS BEMP report stated that Gas- and oil-fired boilers do not represent best practice with respect to heating and cooling sources'. Although this criterion may not be relevant in major part of Europe, this criteria set is applicable also outside EU thus it is considered to be relevant.

- With regard to the sulphur content of heavy oils, although there were found several commercialized products with lower percentage of sulphur grade (see this example from Belgium: <http://www.informazout.be/fr/veel-gestelde-vragen>), the evidence suggested that those products are not commonly available in Europe. Therefore, it is proposed that criterion will remain as it is.
- In TR 4.0 the wording has been amended as suggested by a stakeholder since heating oil is considered to be more appropriate than heavy oil which is normally crude oil and not used for domestic heating.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.3 Mandatory criteria related to water

3.3.1 Criterion 14: Efficient water fittings: Bathroom taps and showers

Proposal for criterion 14: Efficient water fittings: Bathroom taps and showers

Without prejudice to the local or national regulation on water flow rate from bathroom taps and showers, the average water flow rate of the bathroom taps and showers shall not exceed 8.5 litres/minute.

Note: bathtubs, rainshowers, massage-showers are exempt.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, and relevant documentation, including an explanation on how the tourist accommodation fulfils the criterion (e.g. use of flowmeter or small bucket and a watch). EU Ecolabel sanitary tapware products and/or other ISO type I label products having the above mentioned requirements will be deemed to comply. Where EU Ecolabel sanitary tapware products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2013/250/EU ⁽¹⁴⁾. Where other type I label products are used, applicant shall provide a copy of the ISO type I label certificate or packaging label and indicate the ISO type I label requirements that that are like the ones mentioned above.

Rationale of Proposed Criterion text

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

⁽¹⁴⁾Commission Decision 2013/250/EU of 21 May 2013 establishing the ecological criteria for the award of the EU Ecolabel for sanitary tapware (OJ L 145, 31.5.2013, p. 6).

- BEMP for water flow is “to minimise water consumption through the installation of low-flow taps and showers” and proposes as a benchmark of excellence: Shower flow rate ≤ 7 L/min and bathroom tap flow rate ≤ 6 L/min.
- Stakeholder comments received during the revision process expressed some concerns about the customers' experience and problems with pipes if the limit rate is lowered too much (See section 5 for stakeholder comments). A licence holder mentioned that 8 litres/minute threshold could be reachable.
- Against this background it is proposed to keep the current criterion wording. However the limit has been decreased to 8 litres/minute in order to increase the ambition level compare to current requirement (9l/min) recognising that there is a room for improvement as indicated by benchmarks but recognising the mandatory character of the criterion.. In addition, it has been added a sentence *Without prejudice of the local or national regulation on water flow rate from bathroom taps and showers*, with the aim to recognise that in certain areas there might be legislation concerning this to avoid sewage malfunctioning.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- A stakeholder mentioned that this limit might compromise the comfort perceived by customers, such as showers and sensory experience they can offer especially for Luxury hotels.
- A CB mentioned that they are still favouring to keep the former limits or at least to allow a transition period for already certified accommodations. A stricter limit might require additional investment with low impact and could upset licensees. Also a water flow less than 10l in a shower is limiting the comfort of showering and might lead to dissatisfaction and complaints by guests.
- In order to reach a compromise a relaxed value is proposed 8.5l/m but still more ambitious than current criterion in place to allow an improvement. It is expected an smooth transition from current criterion to the updated one due to a slight increase of ambition and that a longer transition period is suggested to be allowed for this product group. In addition exclusion of bathtubs and other new showers are excluded regarding the mandatory character of this criterion.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

- For the verification and assessment of this criterion, in addition to a declaration of compliance relevant documentation to show compliance is requested.
- Where EU Ecolabel sanitary tapware products are used, the applicant shall provide a copy of the EU Ecolabel certificate.
- Where other type I label products are used (complying with the requirements), applicant shall provide a copy of the ISO type I label certificate. In addition, the applicant is requested to indicate the ISO type I label requirements that that are like the ones mentioned in the criteria to facilitate verification when other type of labels are used as requested by a Competent Body.

3.3.2 Criterion 15: Efficient water fittings: toilets and urinals

Proposal for criterion 15: Efficient water fittings: toilets and urinals

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

- a) Continuous flushing is not permitted in any urinal at the accommodation.
- b) Toilet installed within the duration of the EU Ecolabel licence shall have effective toilet flush ≤ 4.5 L

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion together with appropriate supporting documentation. For requirements b) the license holder shall inform the Competent Body about the new installation within the duration of the EU Ecolabel licence of toilets together with appropriate supporting documentation. EU Ecolabel flushing toilets and urinals products and/or another ISO type I label toilets and urinals having the above mentioned requirements shall be deemed to comply. Where EU Ecolabel toilets and urinals products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2013/641/EU ⁽¹⁵⁾. Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate or packaging label and/or packaging label and indicate the ISO type I label requirements that that are like the ones mentioned above.

Rationale of Proposed Criterion text

- EMAS BEMP report identifies water use in tourist accommodation as a significant environmental aspect. It is estimated that water can account for approximately 10% of utility bills in hotels, but this can vary considerably across different types of accommodation and is dependent on the facilities offered (for example a swimming pool or laundry facilities) and advises the avoidance of continuous flushing of urinals.
- The EU Ecolabel criterion is currently in line with this. However with the aim to simplify the criteria text and considering that toilets are more frequently used than urinals, it was suggested for the second proposal of the revised criterion to merge this criterion with current *criterion 54 WCs flushing* (See [annex I](#) for current criteria) which limit the flush of toilets to 6L.
- Best practice for toilet flushing is to “minimise water consumption through the installation low- and dual-flush WCs” and the benchmark of excellence is average effective toilet flush ≤ 4.5 L and installation of waterless urinals.
- Stakeholders mentioned at the AHWG2 that the threshold for toilets is very strict for the mandatory criterion.
- Against this background In TR3.0 the requirement on avoidance of continuous flushing of urinals was kept. In addition, it was proposed that the limit for toilets be relaxed to 7L and only that applies to 70% of toilets to allow a progressive modification of flushes. In addition, it was added a sentence *Without prejudice of the local or national regulation on water flow rate from bathroom taps and showers*, with the aim to recognise that in certain areas there might be legislation concerning this to avoid sewage malfunctioning.

⁽¹⁵⁾Commission Decision 2013/641/EU of 7 November 2013 establishing the ecological criteria for the award of the EU Ecolabel for flushing toilets and urinals (OJ L 299, 9.11.2013, p. 38).

- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- In TR4.0, as a response to additional stakeholder comments with regard to the difficulties to comply with mandatory criteria on toilets flux it is proposed to delete the mandatory criterion on existing toilets and require the benchmark from EMAS BEMP report for new toilet installations. This is still more ambitious than current criteria which only address to urinals.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

- For the verification and assessment of this criterion, in addition to a declaration of compliance relevant documentation to show compliance is requested.
- Where EU Ecolabel toilets and urinals products are used, the applicant shall provide a copy of the EU Ecolabel certificate.
- Where other type I label products are used (complying with the requirements), applicant shall provide a copy of the ISO type I label certificate. In addition, the applicant is requested to indicate the ISO type I label requirements that that are like the ones mentioned in the criteria to facilitate verification when other type of labels are used as requested by a Competent Body.

3.3.3 Criterion 16: Reduction in laundry achieved through reuse of towels and bedclothes

Proposal for criterion 16: Reduction in laundry achieved through reuse of towels and bedclothes

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

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

Rationale of Proposed Criterion text

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

- In the TR3.0, the title of the criterion has been modified to better reflect the aim of the criterion.
- All received comments and responses with regard to TR3.0 are gathered at the section 5
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.4 Mandatory criteria related to waste and wastewater

3.4.1 Criterion 17: Waste prevention: Food service waste reduction plan

Proposal for criterion 17: Waste prevention: Food service waste reduction plan

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

- a) With the aim to reduce package waste: No single dose packages for non-perishable food stuffs (e.g. coffee, sugar, chocolate powder (except tea bags)) shall be used for food services.
- b) With the aim to balance package/food waste depending on the season: For all perishable food stuffs (e.g. Yogurt, jams, honey, cold meats, pastries), the tourist accommodation shall manage the provision of food to guests to minimise both food and packaging waste. To achieve this, the tourist accommodation shall follow a documented procedure linked to the action program (criterion 1) which specifies how the food waste/packaging waste balance is optimised based on the number of guests.

Exempt from this criterion are: shops and vending machines under management of the tourist accommodation and single-dose sugar and/or coffee inside rooms under the condition that the products used for this purpose is fair trade and/or organic certificated and used coffee capsules (if applicable) are given back to the producer for recycling.

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. If applicable, documentation to demonstrate the conditions required in the exemption shall be provided (e.g. take-back declaration from coffee capsules producer, organic and/or fair trade packaging label). This will be moreover checked during the on-site visit.

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

Rationale of Proposed Criterion text

- BEMP is to prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps,

shampoos) and by buying cleaning agents in concentrated and bulk form and by careful management of procurement volumes.

- LCA revealed that concerning waste generation organic solid waste represents 79.9% of the total.
- Considering that the avoidance of packaging could lead to waste of food it was suggested during the revision of current *criterion 21. Breakfast packaging* (See [annex I](#) for current criteria) that the criterion is reformulated with the aim to manage the waste derived from food services (packaging and food). Several stakeholders welcomed the idea behind the criteria, which is to address the trade-off between food waste and packaging waste. However, a lot of concerns were raised relating to the difficulty of assessing and verifying the minimisation of waste.
- A Competent Body expressed concern related to the possibility that what is written on the procedure is not what the applicant is really doing in practice.
- It is proposed to keep the proposed criterion. However a further specification on the text has been introduced to better reflect the aim of each requirement. In order to reduce the complexity concerning assessment and verification, indicative examples of non-perishable or long life food products and perishable foods have been introduced.
- All received comments and responses with regard to TR3.0 are gathered at the section 5
- Only minor modification as requested by stakeholder to specify that single doses coffees inside the rooms might not be a big environmental burden and might be offered in several accommodations. Its specific exception was requested under the condition of organic/fair trade coffee capsules use and that the capsules are given back to producer. There is a growing offer of Fairtrade, organically grown coffee in capsules that are biodegradable. In addition, With regard to the difficulties for some accommodations to find tea without plastic/paper envelope, an exception has been introduced.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

- In addition to a declaration of compliance, the applicant shall provide information on the documented procedure followed to minimise the package/food waste.
- Furthermore, checking during on site visit has been highlighted for this criterion to increase the level of assurance for the verification of this requirement.

3.4.2 Criterion 18: Waste prevention: Disposable items

Proposal for criterion 18: Waste prevention: Disposable items

- a) Disposable toiletries items (shower caps, brushes, nail files, shampoos, soaps etc.) shall not be available to guests in rooms, unless they are requested by guests, there is a legal obligation or it is a requirement of independent quality rating/certification scheme or of hotel chain quality policy the tourism accommodation is a member of.

Proposal for criterion 18: Waste prevention: Disposable items

- b) Disposable food service items (crockery, cutlery, and water jugs) shall not be available to guests in rooms and restaurant/bar service, unless the applicant has an agreement with a recycler for such items.
- c) Disposable towels and bed sheets (draw sheet is excluded) shall not be used in rooms:

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

Rationale of Proposed Criterion text

- EMAS BEMP report guidance highlights the importance of waste prevention, and suggests the avoidance of single-use items as a way of achieving this: “Prevent waste generation through green procurement of products, considering product lifecycle impacts – for example by avoiding single-use items (food, soaps, shampoos) and by buying cleaning agents in concentrated and bulk form – and by careful management of procurement volumes.”
- The Tripadvisor Greenleaders environmental scheme for tourist accommodation [Tripadvisor Greenleaders (2013)], awards points for each of the following requirements:
 - At least 90% of the guestroom bathrooms have refillable dispensers for liquid toiletries (soap, shampoo, and conditioner).
 - At least 90% reusable food service items (i.e. crockery, cutlery, and water jugs).
 - They provide the following rationale: Refillable dispensers create less waste than disposable amenities, as they can be refilled when necessary rather than being replaced.
 - Reusable food items are durable (e.g. ceramic) plates, cutlery, and other items that can be washed and reused for serving food. Disposable food service items made of plastics and polystyrene foam are often non-recyclable or are recycled at low rates, leading them to end up in landfills or be incinerated.
- A stakeholder mentioned that tourist accommodation might use single-use bedding items for quality and practical reasons. However they mentioned that for such type of item they have agreements with recycling services. (See section 5 for stakeholder comments)
- It is proposed that the criterion is partially aligned to the Tripadvisor Greenleaders scheme. Furthermore, a requirement relating to single-use towels and disposable bedding has been included, as a tourist accommodation might use single-use towels and bedding items, such as mattresses protectors, and this is not a best practice, unless they recycled them. The exception when there is a legal obligation or it is a requirement of a quality rating scheme is kept.
- It was generally agreed that the criterion should specify that single-use products should be made available, but only ‘on request’ and together with information that explains to guests the environmental benefits of the tourist accommodation providing refillable/reusable products and systems. However this text has been included in the criterion of information to guests.

- Additionally, in response to stakeholder comments, it is proposed to specify at the user manual that 'on request' may allow guests to request those items prior to the check-in (e.g.: at the reservation).
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- Minor modifications have been introduced in TR4.0 as a response of stakeholder's request. In paragraph c bed items has been replaced by bed sheets and specific exclusion of draw sheets has been introduced, this will allow the use of other bedding items that might be necessary (e.g. draw sheets bed mattresses protectors) for which non disposable items may not be easily available or are needed to comply to with the hygiene hotel policy. In contrast, the exception to use it in case of a recycler agreement has been deleted for towels and bed sheets as for these specific items, the non disposable form are widely available.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

- It is proposed that the Assessment and verification section of the criterion is revised to specify that the 'quality rating scheme' should be independent of the tourist accommodation operator.
- In addition to documentary evidence, checking during on site visit has been highlighted for this criterion to increase the level of assurance for the verification of this requirement.

3.4.3 Criterion 19: Waste sorting and sending for recycling

Proposal for criterion 19: Waste sorting and sending for recycling

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

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

Rationale of Proposed Criterion text

- LCA concerning waste generation revealed that organic solid waste represents 79.9% of the total. LCA studies suggest that separate waste collection and domestic solid waste composting would contribute to a reduction in quantity of waste produced.
- BEMP is "to minimise residual waste generation by implementing waste prevention, by providing convenient on-site waste sorting facilities, and by contracting water recycling services".

- With the aim to simplify the criteria set, EU Ecolabel criteria addressing waste separation: M12. Waste bins in toilets, M18. Waste separation by guests, M19. Waste separation and O74. Fat/oil disposal (See [annex I](#) for current criteria) have been merged as all of them are tackling the same topic. The criteria are in line with BEMP and LCA suggestions.
- In response to stakeholder comments, it is proposed to remove reference to Directive 2012/19/EU of the European Parliament and of the Council in the criterion, since national and local authorities implement the Directive in different ways, according to the specific waste policy for a particular region.
- In response to stakeholder comments, it is proposed that the location of waste containers is clarified by replacing “within easy reach” with “in the rooms and/or on each floor and/or central point of the tourist accommodation” This change would allow the criterion to apply to all tourist accommodation services, including campsites. (See section 5 for stakeholder comments)
- It has been included the clause: "Without prejudice of the local or national regulation". This was considered relevant as there might be countries where this is regulated
- All received comments and responses with regard to TR3.0 are gathered at the section 5
 - Text proposal, in TR4.0 has been modified from "*with particular care regarding hazardous waste e.g. toiletries*" to "*with particular care regarding toiletries and hazardous waste e.g....*" considering that toiletries are not hazardous waste.
 - No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.5 Mandatory criteria related to other criteria

3.5.1 Criterion 20: No smoking in common areas and rooms

Proposal for criterion 20: No smoking in common areas and rooms

a) No smoking shall be allowed in any indoor common areas.

b) No smoking shall be allowed in at least 80% of guests' rooms or rental accommodations (rounded to the next integer).

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

Proposal for criterion 20: No smoking in common areas and rooms

this criterion and documentary evidence such as pictures of the signs displayed inside the tourist accommodation. The applicant shall indicate the number of guests' rooms and shall indicate which of these are non-smoking.

Rationale of Proposed Criterion text

- Although all EU countries have adopted measures to protect citizens against exposure to tobacco smoke following the COUNCIL RECOMMENDATION of 30 November 2009 on smoke-free environments (2009/C 296/02). Stakeholders overwhelmingly agreed that the criterion be tightened to ensure best practice is maintained by all applicants covering those who are not already legally obliged to provide no smoking areas.
- Current criterion 22. No smoking areas (See [annex I](#) for current criteria), requests a mandatory no smoking section. The revised criterion extends the restriction to any indoor common area.
- All received comments and responses with regard to TR3.0 are gathered at the section 5
- As suggested by a Competent Body, part of the optional requirement (see criterion3.10.1) on guest rooms smoking prohibition has been transferred to the mandatory part.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.5.2 Criterion 21: Promotion of environmentally preferable means of transport

Proposal for criterion 21: Promotion of environmentally preferable means of transport

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

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

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

Rationale of Proposed Criterion text

- EMAS BEMP report guidance highlights the importance of encouraging the use of public transport. Furthermore, a LCA review carried out at the preliminary report stage revealed that guest transportation (from home to home), could include more effective actions to promote the most environmentally-sound forms of transport, as well as discourage the most polluting ones.
- Current *M23. Public transportation* (See [annex I](#) for current criteria) promotes preferable means of transport. However, several stakeholders agreed that the criterion should request information is provided on the different means of home to home transportation.
- In addition, several stakeholders at the AHWG2 expressed that the requirement should request applicants to provide detailed and practical information. (See section 5 for stakeholder comments)
- Against this background the criterion text has been further specified in order to cover several preferable means of transportation, including public transportation. Additionally, it is proposed to request the provision of detailed information on preferable means of transport from home to home which has been pointed out as an environmental hotspot by the LCA review and possible agreements or offers available to guests and staff (e.g. pick up service, staff collective bus, electric cars...).
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.5.3 Criterion 22: Information appearing on the EU Ecolabel

Proposal for criterion 22: Information appearing on the EU Ecolabel

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

"This tourist accommodation is actively taking measures to reduce its environmental impact

- promoting renewable energy sources use,
- saving energy and water,
- and reducing waste."

The guidelines for the use of the optional label with text box can be found in the "Guidelines for the use of the EU Ecolabel logo" on the website:

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

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

Rationale of Proposed Criterion text

- This is a horizontal criterion to all product groups and regarding that environmental hotspot for tourist accommodation did not change since last revision it is proposed to retain as it is in the current criteria in force. However minor amendments have been made in the text and verification section to further clarify the requirement.
- Although in TR4.0, it was suggested to modify the text in order to make it accurate and to recognise the different levels of promotion of renewable energies; it was decided in the last EUEB to revert to existing claims for the final version to avoid an extra burden on applicants.

3.6 Optional criteria related to general management

3.6.1 Criterion 23: EMAS registration, ISO certification of the tourist accommodation (up to 5 points)

Proposal for criterion 23: EMAS registration, ISO certification of the tourist accommodation (up to 5 points)

The tourist accommodation shall be registered under the eco-management and audit scheme (EMAS) of the Union (5 points) or certified according to ISO 14001 standard (3 points) or certified according to ISO 50001 standard (2 points).

Assessment and verification

The applicant shall provide appropriate evidence of EMAS registration or ISO certification(s).

Rationale of Proposed Criterion text

- This content of this criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:
 1. EMAS registration and ISO 14001 certification are still in force and so no update is required.
 2. EMAS BEMP report encourages the formulation of an environmental management plan – as is encouraged through this existing criterion.
- ISO 14001 is part of EMAS scheme. However, EMAS has major extra elements as:
 - *the public reporting of third-party verified environmental performance information,*
 - *the focus on continual improvement of the environmental performance of the organisation,*
 - *the recognition by public authorities in the form of registration in a public register after all documents and legal compliance are checked, and*
 - *the active involvement of employees.*

In order to recognise the potential environmental benefits derived from EMAS registration the point allocation has been increased for this option.

- As requested by a CB during the last consultation in June 2016, ISO 50001 on Energy management has been introduced in this criterion for the final version.

Rationale of proposed "Assessment and verification"

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

3.6.2 Criterion 24: EMAS registration or ISO certification of suppliers (up to 5 points)

Proposal for criterion 24: EMAS registration or ISO certification of suppliers (up to 5 points)

At least two of the main suppliers or service providers of the tourist accommodation shall be local and registered with EMAS (5 points) or certified according to ISO 14001 (2 points) or certified according to ISO 50001 standard (1.5 points).

For the purposes of this criterion, a local service supplier is considered to be a supplier located within a 160 kilometres radius of the tourist accommodation.

Assessment and verification

The applicant shall provide appropriate evidence of EMAS registration or ISO certification(s) by at least two of its main suppliers.

Rationale of Proposed Criterion text

- This content of this criterion does not require major updating based on the following:
 1. EMAS registration and ISO 14001 certification are still in force and so no update is required.
 2. EMAS BEMP report encourages the formulation of an environmental management plan – as is encouraged through this existing criterion.
- A stakeholder proposed changing the number of suppliers that are required to be EMAS or ISO 14001 registered from one to four. However, it is possible that this change would favour larger tourist accommodation services and make the criterion difficult for smaller tourist accommodation services to comply with.
- In TR3.0 it was proposed that the criterion is revised to require two of the suppliers to be registered/certified, to increase the level of ambition while keeping the criterion feasible for SMEs. As several criteria have been removed in order to simplify the criteria set, some points should be reallocated in other criteria in order to retain the scoring rules of the points system. It is suggested to allocate extra points to this criterion as this is an environmental hotspot highlighted by EMAS BEMP report.
- ISO 14001 is part of EMAS scheme. However, EMAS has major extra elements as:
 - *the public reporting of third-party verified environmental performance information,*
 - *the focus on continual improvement of the environmental performance of the organisation,*
 - *the recognition by public authorities in the form of registration in a public register after all documents and legal compliance are checked, and*

- *the active involvement of employees.*

In order to recognise the potential environmental benefits derived from EMAS registration the point allocation has been increased for this option.

- In TR4.0, a requirement has been added in order to promote the short supply chain. In addition to be registered, the suppliers are requested to be local. Nevertheless, the definition of local might not be clear enough, therefore, it was proposed, to include a definition of 'local' as within a 160 kilometres radius of the tourist accommodation, aligned to the Sustainable Restoration Scheme. This figure is based on a survey carried out in the UK in 2008 (The Hartman Group, 2008)
- As requested by a CB during the last consultation in June 2016, ISO 50001 on Energy management has been introduced in this criterion for the final proposal.

Rationale of proposed "Assessment and verification"

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

3.6.3 Criterion 25: Ecolabelled services (up to 4 points)

Proposal for criterion 25: Ecolabelled services (up to 4 points)

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

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

Rationale of Proposed Criterion text

- EMAS BEMP report benchmark of excellence proposes all outsourced laundry to be carried out by a provider who has been awarded an ISO Type I ecolabel (e.g. Nordic Swan), and all in-house large-scale laundry operations.
- Current criterion *095. Subcontractors comply with mandatory criteria* (See [annex I](#) for current criteria), was found to be vague and it has been reformulated to request that outsourced laundry and/or cleaning is carried out by a provider who has been awarded an ISO Type I ecolabel as a result of stakeholders comments and recognising the environmental potential associated to ecolabelled services.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.6.4 Criterion 26: Environmental and social communication and education (up to 2 points)

Proposal for criterion 26: Environmental and social communication and education (up to 2 points)

- a) The tourist accommodation shall provide environmental communication and education notices on local biodiversity, landscape and nature conservation measures to guests (1 point)
- b) Guest entertainment includes elements of environmental education (e.g. books, animations, events) (1 point)

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

Rationale of Proposed Criterion text

- BEMP is to “provide guests with interactive on-site education of environmental issues, including courses, nature-trails, or equipment such as low-carbon transport (bicycles, electric bicycles)”.
- Other comparable labels for tourist accommodation include criteria on promoting local goods and services, including providing guests with information on “guides, restaurants, markets and craft centres” [Travelife criteria (2012)].
- It is suggested that this criterion is updated to encourage tourist accommodation sites to make this information available to guests. This criterion will remain optional.
- Minor amendments are proposed in the title in order to reflect the inclusion of the social requirements in the criterion.
- In TR4.0, it was suggested that the requirement on provision of information to guests on local touristic points of interest, local guides, local restaurants, markets, craft centres to guests is transferred to the mandatory criterion on information to guest (See section 3.1.2) as it is not a big burden and has a potential impact on local environment.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.6.5 Criterion 27: Consumption monitoring: Energy and water sub-metering (up to 2 points)

Proposal for criterion 27: Consumption monitoring: Energy and water sub-metering (up to 2 points)

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

- a) Rooms

Proposal for criterion 27: Consumption monitoring: Energy and water sub-metering (up to 2 points)

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

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with a map showing the places where meters are placed.

Rationale of Proposed Criterion text

- This content of this criterion does not require updating, and so it is proposed that no changes are made. This is based on the following:
 1. Stakeholder opinions on this criterion were conflicting; suggestions included either removing this criterion or making it mandatory. On balance, it is suggested that this criterion is maintained as optional to consider both sides of this argument. In addition, this criterion is not unachievable – tourist accommodation sites must already collect mandatory data on energy and water consumption within the site as a whole. This option criterion awards points for further investment in monitoring activities.
 2. EMAS BEMP report encourages sub-metering and benchmarking all major energy/water-consuming processes and this is reflected in the current EU Ecolabel criterion and so no update is required.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

- The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion and a map showing the places where meters are placed for the verification of this criterion as suggested by a Competent Body.

3.7 Optional criteria related to energy

3.7.1 Criterion 28: Energy efficient space heating and water heating appliances (up to 3 points)

Proposal for criterion 28: Energy efficient space heating and water heating appliances (up to 3 points)

The tourist accommodation shall have at least:

- a) a water-based space heating appliance meeting criterion 6 (a) (1 point)
- b) a local space heating appliance having at least the energy class A as defined in Commission Delegated Regulation (EU) 2015/1186 ⁽¹⁶⁾ (1 point)
- c) a water heating appliance meeting criterion 6 (c) (1 point)

⁽¹⁶⁾Commission Delegated Regulation (EU) 2015/1186 of 24 April 2015 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of local space heaters (OJ L 193, 21.7.2015, p. 20).

Proposal for criterion 28: Energy efficient space heating and water heating appliances (up to 3 points)

Assessment and verification: The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the space and water heaters appliances indicating how the required efficiency in 6 a), and/or 6 b) and 6c) is met. EU Ecolabel water-based heaters products will be deemed to comply with requirement 6 a).ii. Other ISO type I label products having the requirements mentioned in 6 a), and/or 6 b) and/or 6c) will be deemed to comply. Where EU Ecolabel water-based heaters products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2014/314/EU(4).Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate and/or packaging label and indicate the ISO type I label requirements that are listed in points (a), (b) and (c).

Rationale of Proposed Criterion text

- BEMP is to install the most efficient HVAC systems. This is in line with the current EU Ecolabel criterion.
- This criterion has been brought into line with the EU Ecolabel, Ecodesing and Energy labelling, but other existing ecolabels including equivalent requirements are recognized as valid for verification (see Assessment and verification section).
- It is proposed this criterion to be aligned to the EU Ecolabel for water based space heaters, awarding points for the existing appliances that comply with the mandatory criterion. This approach is also proposed for water heating appliances. The optional criterion is therefore aimed at awarding points to those tourism accommodations that have an efficient heating appliance installed at the moment of the application, while the mandatory would apply to the new appliance installed during the period of validity of the license. The objective of this proposal is to encourage the replacement of old appliances, since their lifetime might span 30 years and therefore the mandatory criterion might never be applied.
- For local space heating appliances, it is proposed to award points to those appliances meeting the Energy Class A as defined in Commission Delegated Regulation (EU) 2015/1186 (16). This ensures that the appliances selected are amidst the best performance ones, i.e. those showing energy efficiency above 93% for fossil fuel boilers or above 65% for biomass boilers (estimations based on correction factors equal 5%).
- The title of the criterion has been modified to include space heaters (both water-based and local).
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those where the manufacturers and/or installers declare the energy efficiency of the equipment, and what is required by Ecodesign regulations where applicable. The requirements for water-

based heaters are harmonized with the EU Ecolabel criteria for this product group, therefore, the heaters awarded EU Ecolabel are deemed to comply. Other ISO type I labels covering the requirements are also recognized as proof of compliance, as requested by the stakeholders.

- According to the stakeholders' suggestion, the assessment and verification section has been reinforced by an information requirement which enables the Competent Body to be aware of the new installation within the duration of the EU Ecolabel licence of above mentioned appliances.
- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates. In addition, the applicant is requested to indicate the ISO type I label requirements that that are like the ones mentioned in the criteria to facilitate verification when other type of labels are used as requested by a Competent Body.

3.7.2 Criterion 29: Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)

Proposal for criterion 29: Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)

The tourist accommodation shall comply with one of the thresholds:

- a) 50% of household air conditioners or air-based heat pumps in the tourist accommodation (rounded to the next integer) have energy efficiency 15% higher than the threshold set in criterion 7 (1.5 point)
- b) 50% of household air conditioners or air-based heat pumps in the tourist accommodation (rounded to the next integer) have energy efficiency 30% higher than the threshold set in criterion 7 (2 points)

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

Rationale of Proposed Criterion text

- Directive 2002/31/EC was repealed from 1 January 2013 by Commission Delegated Regulation No 626/2011 of 4 May 2011 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of air conditioners [OJ L 178, 4.5.2011, p.1]. Directive 2010/30/EU introduces energy efficiency classes A+ to A+++ .The energy efficiency class must therefore be classified following Annex II of this Regulation. Therefore, an update in line with the Regulation 2011/626/EU is required, while awarding additional efforts beyond the mandatory requirement.
- EMAS BEMP report specifies that air conditioning systems should be energy efficient, properly maintained and appropriately used. The current criterion ensures that the system used is efficient.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.7.3 Criterion 30: Air-based heat pumps up to 100 kW heat output (3 points)

Proposal for criterion 30: Air-based heat pumps up to 100 kW heat output (3 points)

The tourist accommodation shall have at least an air-based heat pump meeting criterion 7 (if applicable, see note in criterion 7) and awarded with the EU Ecolabel in accordance with Commission Decision 2007/742/EU ⁽¹⁷⁾ or other ISO Type I label.

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

Rationale of Proposed Criterion text

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

Table 7: Product policies covering heat pumps

Product policy	Scope	Criterion within TAS criteria set
EU Ecolabel water-based heaters (Commission Decision 2014/314/EU)	Air/brine/water/ground to water heat pumps up to 400 kW heat output	Criterion 6 and 28
Ecodesign and energy labelling room air conditioning appliances (Commission Delegated Regulation (EU) No 626/2011)	Air to air heat pumps up to 12 kW cooling capacity, electrically driven	Criterion 7 and 29
EU Ecolabel air-based heat pumps (Commission Decision 2007/742/EU)	Air/brine/water/ground to air heat pumps up to 100 kW heat output, both electrically and fuel driven, and absorption/adsorption	Criterion 30

Table 7 summarizes the product policies, their scopes, and the respective criterion that reflects their requirements within the TAS criteria set. As it can be observed, there is a range of technologies for which there are not Ecodesign/Energy labelling regulations yet:

- brine/water/ground to air heat pumps
- air to air heat pumps above 12 kW
- air to air heat pumps up to 12 kW not electrically driven

⁽¹⁷⁾Commission Decision 2007/742/EC of 9 November 2007 establishing the ecological criteria for the award of the Community eco-label to electrically driven, gas driven or gas absorption heat pumps (OJ L 301, 20.11.2007, p. 14).

- However, these appliances are within the scope of the EU Ecolabel of air-based heat pumps (Commission Decision 2007/742/EU), up to 100 kW, which includes criteria on energy efficiency, refrigerants, noise, etc. It is therefore appropriate to formulate a criterion that covers these technologies while promotes this EU Ecolabel product group. Nevertheless it is also necessary to harmonize the energy efficiency criterion to the current Energy labelling on air conditioners (Commission Delegated Regulation (EU) No 626/2011), whose scope overlaps EU Ecolabel's in the air to air heat pumps up to 12 kW electrically driven. This would avoid the use of outdated energy classes and any loophole within the energy efficiency criteria set of the TAS product group.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those where the manufacturers and/or installers declare the energy efficiency of the equipment, and what is required by Ecodesign regulations where applicable. Other ISO type I labels covering the requirements are also recognized as valid as proof of compliance, as suggested by the stakeholders. The EU Ecolabel or other ISO type I label certificate is requested for the assessment and verification.
- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates

3.7.4 Criterion 31: Energy efficient household appliances and lighting (up to 4 points)

Proposal for criterion 31: Energy efficient household appliances and lighting (up to 4 points)
<p>Tourist accommodation shall have energy efficient household appliances for the following categories: (0.5 point or 1 point each of the following categories, to a maximum of 4 points)</p> <ul style="list-style-type: none"> a) household refrigerating appliances, of which at least 50% (0,5 point) or 90% (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as laid down in Annex IX to Commission Delegated Regulation (EU) No 1060/2010 ⁽¹⁸⁾; b) household electric ovens, of which at least 50% (0,5 point) or 90% (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as laid down in Annex I to Commission Delegated Regulation (EU) No 65/2014⁽¹⁹⁾; c) household dishwashers, of which at least 50% (0,5 point) or 90% (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better

⁽¹⁸⁾Commission Delegated Regulation (EU) No 1060/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household refrigerating appliances (OJ L 314, 30.11.2010, p. 17).

⁽¹⁹⁾Commission Delegated Regulation (EU) No 65/2014 of 1 October 2013 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of domestic ovens and range hoods (OJ L 29, 31.1.2014, p. 1).

Proposal for criterion 31: Energy efficient household appliances and lighting (up to 4 points)

as laid down in Annex VI to Commission Delegated Regulation (EU) No 1059/2010⁽²⁰⁾;

- d) household washing machines, of which at least 50% (0,5 point) or 90% (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as laid down in Annex VI to Commission Delegated Regulation (EU) No 1061/2010⁽²¹⁾;
- e) office equipment of which at least 50% (0,5 point) or 90% (1 point) (rounded to the next integer) shall be ENERGY STAR qualified as defined by Energy Star v6.1 for computers and under the agreement set out in Commission Decision (EU) 2015/1402⁽²²⁾, by Energy Star v6.0 for Displays, by Energy Star v2.0 for Imaging equipment, by Energy Star v1.0 for Uninterruptible power supplies and/or Energy Star v2.0 for Enterprise servers and under the agreement set out in set out in Commission Decision 2014/202/EU⁽²³⁾.
- f) household tumble driers, of which at least 50% (0,5 point) or 90% (1 point) (rounded to the next integer) shall be of Energy Label rated Class A++ or better as laid down in Annex VI to Commission Delegated Regulation (EU) No 392/2012⁽²⁴⁾;
- g) household vacuum cleaners, of which at least 50% (0,5 point) or 90% (1 point) (rounded to the next integer) shall be of Energy Label rated Class A or better as laid down in Annex I to Commission Delegated Regulation (EU) No 665/2013⁽²⁵⁾;
- h) electrical lamps and luminaires, of which at least 50% (0,5 point) or 90% (1 point) shall be at least of Class A++ as laid down in Annex VI to Delegated Regulation (EU) No 874/2012.

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

Assessment and verification: The applicant shall provide documentation indicating the

⁽²⁰⁾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 (OJ L 314, 30.11.2010, p. 1).

⁽²¹⁾Commission Delegated Regulation (EU) No 1061/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household washing machines (OJ L 314, 30.11.2010, p. 47).

⁽²²⁾ Commission Decision (EU) 2015/1402 of 15 July 2015 determining the European Union position with regard to a decision of the management entities under the Agreement between the Government of the United States of America and the European Union on the coordination of energy-efficiency labelling programmes for office equipment on the revision of specifications for computers included in Annex C to the Agreement (OJ L 217, 18.8.2015, p. 9).

⁽²³⁾Commission Decision of 20 March 2014 determining the European Union position for a decision of the Management entities under the Agreement between the Government of the United States of America and the European Union on the coordination of energy-efficiency labelling programmes for office equipment on adding specifications for computer servers and uninterruptible power supplies to Annex C to the Agreement and on the revision of specifications for displays and imaging equipment included in Annex C to the Agreement (OJ L 114, 16.4.2014, p. 68).

⁽²⁴⁾Commission Delegated Regulation (EU) No 392/2012 of 1 March 2012 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household tumble driers (OJ L 123, 9.5.2012, p. 1).

⁽²⁵⁾ Commission Delegated Regulation (EU) No 665/2013 of 3 May 2013 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of vacuum cleaners (OJ L 192, 13.7.2013, p. 1).

Proposal for criterion 31: Energy efficient household appliances and lighting (up to 4 points)

energy class (Energy Star certificate for category e)) of all appliances for the applicable category.

Rationale of Proposed Criterion text

- Several stakeholders at AHWG1 raised concern about the cost of replacing all existing equipment and the high level of stringency if A+++ is required as proposed in the first revised proposal. Furthermore there is an issue on the production of waste from equipment that is disposed of before reaching its end of life. It was suggested by several stakeholders to require A+++ energy efficiency class for equipment that is acquired and keep the current criterion requirement for the existing equipment. However, since it is an optional criterion points must be awarded at the moment of application and not during the licence period thus requirements for new acquisitions do not fit for optional criteria.
- The environmental program Tripadvisor Greenleaders [Tripadvisor Greenleaders (2013)], awards points for each EU Energy Label rated Class A or better or ENERGY STAR qualified appliance that is found in at least 90% of guest rooms.
- In TR3.0, it was proposed that the criterion is maintained but the required energy class is lowered to A++, as requested by several stakeholders. This requirement is more ambitious than current criterion (Class A for most appliances) but allows some flexibility by requesting that 50% or 90% of household appliances must comply instead of all household appliances. This partially aligns the criterion to Greenleaders to avoid producing unnecessary waste and allows scoring points recognising the different degrees of improvement. In addition, a requirement on vacuum cleaners has been added.
- As several criteria have been removed in order to simplify the criteria set, it was proposed that in TR3.0 some points were reallocated to other criteria to maintain the scoring rules of the points system. It was therefore suggested to include extra points in this criterion as this is an environmental hotspot highlighted by EMAS BEMP report.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- In TR4.0, requirement on most efficient lighting has been added to allow a further improvement to the mandatory criteria. The title has been modified accordingly.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.7.5 Criterion 32: Heat recovery (up to 3 points)

Proposal for criterion 32: Heat recovery (up to 3 points)

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

Proposal for criterion 32: Heat recovery (up to 3 points)

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

Rationale of Proposed Criterion text

- BEMP is to encourage the installation of heat recovery systems where possible. Stakeholder feedback on the current allocation of points suggested that stakeholders are in favour of increasing the number of points from the current 1.5 due to the “difficulty of fulfilling the criterion”.
- The criterion shall remain as previously proposed but the number of points awarded has been increased in order to recognise the relatively high investment required to introduce a heat recovery system and that it is a hotspot identified in EMAS BEMP report.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.7.6 Criterion 33: Thermoregulation and window insulation (up to 4 points)

Proposal for criterion 33: Thermoregulation and window insulation (up to 4 points)

a) The temperature in every guest rooms shall be regulated by guests. The temperature shall allow individual regulation within the following designated range (2 points) :

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

b) 90% of windows in heated and/or air conditioned rooms and common areas shall be insulated with at least double glazing or equivalent (2 points).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the thermoregulatory systems or procedures followed to set the designated temperature ranges and/or windows pictures. An expert declaration shall be provided in case that equivalent to multiple glazing window insulation is used.

Rationale of Proposed Criterion text

- BEMP is to encourage the installation of zoned temperature control.
- Maintaining moderate thermostat setpoints during the summer and winter reduces the amount of energy required for cooling and heating, respectively. Additionally, guest-

controlled thermostats allow guests to adapt their room temperature to their own comfort level. However this can lead to wasted energy by guests. By limiting guest controlled thermostats to within a designated range could save energy while still providing individual control to each guest room.

- Tripadvisor Greenleaders [Tripadvisor Greenleaders (2013)], proposes as optional requirements the setting of indoor cooling/heating temperatures for common areas and guest rooms.
- The standard EN15251 for Indoor environmental input parameters for design and assessment of energy performance of buildings addressing indoor air quality, thermal environment, lighting and acoustics reveals the following recommended indoor temperatures:

Figure 5: Recommended design values of the indoor temperature for design of buildings and HVAC systems

Type of building/ space	Category	Operative temperature °C	
		Heating (winter season), ~ 1,0 clo	Cooling (summer season), ~ 0,5 clo
Residential buildings: living spaces (bed rooms, drawing room, kitchen etc)	A	21,0	25,5
	B	20,0	26,0
	C	18,0	27,0
Sedentary ~ 1,2 met			

Source: EN 15251

- The proposal made for the AHWG2 was partially aligned to Tripadvisor Greenleaders requirements on indoor/guestrooms' thermoregulation and to EN15251 recommended values. However stakeholder's feedback pointed out that the EN15251 recommended values are very stringent and might not meet the comfort temperature expectations of guests. (See section 5 for stakeholder comments).
- In TR3.0, in order to ensure energy efficiency, it was proposed that this criterion is maintained and the temperature values be aligned to Tripadvisor Greenleaders requirements on indoor/guestrooms' thermoregulation. Additionally, the awarded points are proposed to be reallocated recognising the different actions that can be taken in order to save energy.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- In TR4.0, the criterion has been split in two parts. The requirements addressing temperature control in common areas has been transferred to mandatory criteria. However in order to recognise its obligatory character and that several stakeholders consider 22 degrees to be strict, "+/- 2°C, on customers' request" has been added for the mandatory criteria. (See section 3.2.4) The requirement for guest rooms temperature control remains as optional in order to recognise the difficulties to meet this criterion. In addition, best practices on building envelope have been addressed by adding a requirement on window insulation under the revised criterion.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.7.7 Criterion 34: Automatic switch off appliances/devices (up to 4.5)

Proposal for criterion 34: Automatic switch off appliances/devices (up to 4.5)

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

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

Rationale of Proposed Criterion text

- EMAS BEMP report outlines that automatic switching off of heating and cooling systems intelligent lighting control is encouraged as a method of saving energy. However, it is recognised that for small enterprises where automatic lighting control in rooms may not be practical.
- In TR3.0, the proposed criterion merges the current criteria. 042. Automatic switching-off of air conditioning and heating systems (1.5 points), 047. Automatic switching off lights in tourist accommodation (1.5 points), 050. Automatic switching off outside lights (1.5 points) (See [annex I](#) for current criteria) into a single criterion with the aim to simplify the criteria set. Regarding the optional character of this criterion it is considered to be suitable to request for these types of devices that might be expensive however to allow certain flexibility it is requested for the 90% of guest rooms.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- Minor wording clarifications have been introduced in TR4.0. No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.7.8 Criterion 35: District heating/cooling and cooling from cogeneration (up to 4 points)

Proposal for criterion 35: District heating/cooling and cooling from cogeneration (up to 4 points)

- a) The heating and/or cooling of the tourist accommodation shall be provided by efficient district heating or cooling system. For the purposes of the EU Ecolabel this is defined as follows: a district heating or cooling system using at least 50 % renewable energy, 50 % waste heat, 75 % cogenerated heat or 50 % of a combination of such energy and heat; as defined by Directive 2012/27/EU (2 points)
- b) Cooling of the tourist accommodation shall be provided by a high efficiency cogeneration unit according to Directive 2012/27/EU (2 points).

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the district heating system and/or the cooling system by means of cogeneration.

Rationale of Proposed Criterion text

- Cogeneration or Combined Heat and Power generation, both on-site and off-site (district heating), has a significant potential for saving primary energy in the energy transformation process. The International Energy Agency has addressed the assessment of the CHP through cost-benefit analysis in two reports released in 2008 and 2009 [IEA (2008) and IEA (2009)]. Some of the main conclusions were that CHP can reduce CO₂ emissions arising from new generation in 2015 by more than 4% (170 Mt/year), while in 2030 this saving increases to more than 10% (950 Mt/year). These savings are attained due to a more efficient process (recovery of waste heat) together with a decrease of transmission and distribution losses, since the energy transformation is produced closer to the consumption centres (distributed generation).
- The formulation of this criterion is proposed to distinguish between district heating and on-site cogeneration. The first part (a) addresses district heating, and it has been worded according the definition of 'efficient district heating' within the Directive 2012/27/EU. This definition ensures that the heating/cooling is produced by means of renewable energy, waste heat or cogeneration. The consumption of heating/cooling from a district network is relatively akin to electricity consumption, however, there is a relevant difference regarding the GO schemes for each of them. While the GO systems for electricity are well defined and almost fully deployed across EU, the schemes supporting GO of heating/cooling are not very common since they are voluntary, as provided in the Directive 2009/28/EC [RE-DISS (2012)]. Nevertheless, this should not hamper the promotion of efficient district heating/cooling systems within the TAS criteria set, and therefore it is proposed to keep this criterion.
- The second part of the criterion (b) refers just to cooling from high efficiency cogeneration units. This is to avoid overlapping with criterion 6 and criterion 28, which already regards cogeneration units for space and water heating. This voluntary criterion is therefore designed to award those installations that go a step further and provide cooling, for example, by means of an absorption/adsorption chiller. This enables the

cogeneration unit to stretch its capacity to meet the energy demands of the TAS, bolstering the flexibility as an added value of this technology [(IEA (2014)]

- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.7.9 Criterion 36: Electric hand driers with proximity sensor (1point)

Proposal for criterion 36: 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. Where ISO type I label products are used, applicant shall provide a copy of the type I label certificate or packaging label.

Rationale of Proposed Criterion text

- The use of proximity sensors can be assumed to be preferable to push button driers – once these are pressed they will run according to a timer, regardless of whether anyone is drying their hands.
- It is suggested that hair dryers are removed from this criterion, as they do not typically operate via proximity sensor.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.7.10 Criterion 37: Space Heater emissions (1.5 points)

Proposal for criterion 37: Space Heater emissions (1.5 points)

For all space heaters in the tourist accommodation the nitrogen oxide (NO_x) content of the exhaust gas shall not exceed the limit values indicated in the table below, calculated as stated in

- i. for gaseous and liquid fuel space water-based heaters, Commission

Proposal for criterion 37: Space Heater emissions (1.5 points)

- Regulation (EU) No 813/2013⁽²⁶⁾;
- ii. for solid fuel space water-based heaters, Commission Regulation (EU) 2015/1189⁽²⁷⁾;
 - iii. for gaseous and liquid fuel local space heaters, Regulation (EU) 2015/1188;
 - iv. for solid fuel local space heaters, Regulation (EU) 2015/1185.

Heat generator technology	NOx emission limit
Gas heaters	For water-based heaters equipped with internal combustion engine: 240_mg/kWh GCV energy input For water-based and local heaters equipped with external combustion (boilers): 56 mg/kWh GCV energy input
Liquid fuel heaters	For water-based heaters equipped with internal combustion engine: 420 mg/kWh GCV energy input For water-based and local heaters equipped with external combustion (boilers): 120 mg/kWh GCV energy input
Solid fuel heaters	Space water-based heaters: 200 mg/Nm ³ at 10% O ₂ Local space heaters: 200 mg/Nm ³ at 13% O ₂

For solid fuel boilers and solid fuel local space heaters in the tourist accommodation the emissions of particulate matter (PM) of the exhaust gas shall not exceed the limit values laid down in Regulation (EU) 2015/1189 and in Commission Regulation (EU) 2015/1185, respectively.

Assessment and verification: The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the space heaters appliances indicating how the required efficiency is met. EU Ecolabel water-based heaters products will be deemed to comply. Other ISO type I label products having the above mentioned requirements will be deemed to comply. Where EU Ecolabel water-based heaters products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2014/314/EU. Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate and/or packaging label and indicate the ISO type I label requirements that are like the ones mentioned above.

Rationale of Proposed Criterion text

- NOx air emissions cause acidification and are produced during combustion of fuels in two different ways:
 - (i) oxidation of the nitrogen content of the fuels, and

²⁶ 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 (OJ L 239, 6.9.2013, p. 136).

²⁷ Commission Regulation (EU) 2015/1189 of 28 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for solid fuel boilers (OJ L 193, 21.7.2015, p. 100).

(ii) as a result of chemical reactions between the oxygen and nitrogen molecules in the air triggered by the specific combustion conditions. This occurs only when there is enough air available, when the temperature is high enough (above 1200 °C) and when there is enough time (residence time) for the reaction to take place at this high temperature.

- NOx requirements from several product policy schemes are presented in Table 8

Table 8. Comparison of NOx emission limits in different product policy schemes

Heat generator technology	Ecodesign ¹⁾	EU Ecolabel ²⁾	Blue Angel ³⁾	Nordic Ecolabel ⁴⁾	Austrian Eco-label ⁵⁾	GPP ⁶⁾
Gas fuel boiler	56 mg/kWh 130 mg/kWh for local.	36 mg/kWh GCV energy input	40 mg/kWh	N/A	N/A	<u>Condensing:</u> 60 mg/kWh <u>Non-condensing:</u> 70 mg/kWh
Liquid fuel boiler	120 mg/kWh for water-based 130 mg/kWh for local.	100 mg/kWh GCV energy input	N/A	N/A	N/A	120 mg/kWh
Solid fuel boiler (biomass)	200 mg/Nm ³ at 10% O ₂ for water-based 200 mg/Nm ³ at 13% O ₂ for local (275 mg/Nm ³ at 10% O ₂)	150 mg/Nm ³ at 10 % O ₂	<u>Pellets:</u> 150 mg/Nm ³ <u>Chips:</u> 190 mg/Nm ³	340 mg/m ³	<u>Automatic:</u> 100 mg/MJ (pellets); 120 mg/MJ (chips); <u>Manual:</u> 120 mg/MJ	340 mg/Nm ³
Fuel-driven heat pump	<u>Gas fuel:</u> 70 mg/kWh (external); 240 mg/kWh (internal) <u>Liquid fuel:</u> 120 mg/kWh (external); 420 mg/kWh (internal)	<u>Gas fuel:</u> 36 mg/kWh (external); 170 mg/kWh (internal) <u>Liquid fuel:</u> 100 mg/kWh (external); 380 mg/kWh (internal)	<u>External:</u> 40 mg/kWh <u>Internal:</u> 100 mg/Nm ³	No limit	N/A	No limit
Electrically-driven heat pump	No limit	No limit	No limit	No limit	N/A	No limit
Cogeneration	<u>Gas fuel:</u> 70 mg/kWh (external); 240 mg/kWh (internal) <u>Liquid fuel:</u> 120 mg/kWh (external); 420 mg/kWh (internal)	<u>Gas fuel:</u> 170 mg/kWh GCV energy input <u>Liquid fuel:</u> 380 mg/kWh GCV energy input	<u>Gas fuel:</u> 250 mg/Nm ³ <u>Liquid fuel:</u> 2500 mg/Nm ³	N/A	N/A	No limit

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

²⁾ EU Ecolabel criteria for: water-based heaters. Commission Decision 2014/314/EU

³⁾ Blue Angel criteria for: gas-fired calorific-value heating devices; wood-pellet boilers; heat pumps using absorption and adsorption technology or operating by use of combustion engine-driven compressors; heat pumps using an electrically powered compressor; small-scale gas-fired cogeneration modules; and small-scale liquid-fired cogeneration modules. In the Blue Angel, emissions of solid biomass boilers are measured at 13 % O₂ and should be multiplied by 1.375 to be at 10 % O₂.

⁴⁾ Nordic Ecolabelling criteria for: solid biofuel boilers; and heat pumps.

⁵⁾ Austrian Eco-Label criteria for: wood-fired heating systems. The Austrian Eco-Label sets NO_x emissions in mg/MJ: 100 mg/MJ ≈ 206 mg/Nm³; 120 mg/MJ ≈ 248 mg/Nm³.

⁶⁾ EU GPP criteria for: combined heat and power; and EU GPP preparatory work for: boilers; and heat pumps and air conditioning.

- Ecodesign requirements for water-based heaters using gas and liquid fuels are set out in Commission Regulation (EU) No 813/2013, and the limits for NOx emissions will come into force on 26 September 2018. The regulation specifies that emissions shall be measured according to standard rating conditions and rated heat output, and the test

methods described in the Communication 2014/C. Commission Regulation (EU) 2015/1188(5) for gaseous and liquid fuel local space heaters also establishes a limit for NOx emissions, but a little less strict (130 mg/kWh).

- Commission Regulation (EU) 2015/1189 of 28 April 2015 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for solid fuel boilers sets a threshold of 200 mg/Nm³ at 10% O₂, for biomass boilers, to be in force by 2020. This limit value is expressed as seasonal space heating emissions, i.e. an average between full and part load conditions.
- Commission Regulation (EU) 2015/1185(4) for solid fuel local space heaters settles a more lenient threshold (200 mg/Nm³ at 13% O₂ = 275 mg/Nm³ at 10% O₂), to be mandatory by 2022.
- The requirements set by these regulations do not apply to existing heaters, and therefore, the limit values on NOx emissions would entail an additional effort while alignment to mandatory requirements across Europe is secured.
- The above mentioned regulations (Commission Regulation (EU) 2015/1189 and Commission Regulation (EU) 2015/1185) also set limits on other pollutants, of which particulate matter is the more important for solid biomass boilers and local heaters. These limits will be mandatory by 2020 and 2022, respectively.
- Text amendment was introduced to cover PM emissions in TR4.0 and title was amended accordingly.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

- The documents requested for assessment and verification are those where the manufacturers and/or installers declare the energy efficiency of the equipment, and what is required by Ecodesign regulations. As it can be observed in Table 8, EU Ecolabel water-based heaters shall meet stricter NOx limit values, so they are deemed to comply. Other ISO type I labels covering the requirement are also recognized as valid as proof of compliance.
- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates. In addition, the applicant is requested to indicate the ISO type I label requirements that are like the ones mentioned in the criteria to facilitate verification when other type of labels are used as requested by a Competent Body.

3.7.11 Criterion 38: Procurement of electricity from a renewable electricity supplier (up to 4 points)

Proposal for criterion 38: Procurement of electricity from a renewable electricity supplier (up to 4 points)

- a) The tourist accommodation shall contract an individual electricity tariff containing the 100% (overall fuel mix marketed by the supplier or product fuel mix of the purchased tariff) of the electricity from renewable energy sources as defined in Directive 2009/28/EC ⁽¹³⁾ and certified by an environmental electricity label. (4 points)

Proposal for criterion 38: Procurement of electricity from a renewable electricity supplier (up to 4 points)

- b) Alternatively the 100% electricity from renewable energy sources certified by an environmental electricity label can also be acquired by the separate purchase of Guarantees of Origin, as defined in Article 2(j) of Directive 2009/28/EC ⁽¹³⁾. (3 points)

For the purpose of this criterion, the environmental electricity label shall comply with the following conditions:

1. The quality label's standard is verified by an independent organization (third party).
2. The certified electricity originates from new renewable plant capacity installed within the past two years or financially promotes the investment in new renewable power capacities.

Assessment and verification: The applicant shall supply a declaration from (or the contract with) the electricity supplier(s) indicating the nature of the renewable energy source(s) and the percentage of electricity supplied that is from a renewable source and where relevant that 100% of electricity purchased is certified or has been awarded a third party certified environmental label. In addition, for point b), declarations from the guarantees of origin supplier showing compliance with conditions mentioned in criterion 12 a) shall also be provided.

Rationale of Proposed Criterion text

- Electricity ecolabels could be a way to prove additionality and to go one step further. CEER Advice on customer information on sources of electricity report [CEER, (2015)] highlights that number of private renewable electricity labels were introduced into the market with the aim of helping customers finding the appropriate electricity product for their own particular interest. (For updated information see listed ecolabels in the ecolabelindex: http://www.ecolabelindex.com/ecolabels/?search=electricity&as_values_061=)
- However, CEER report states the assessment criteria used by labels are of uneven quality, especially in respect to sustainability issues. Each label system has its own range of criteria which can significantly differ from other labels. Each label guarantees a particular set of properties and “additionalities” based on self-defined criteria, making it difficult to compare them among each other. Despite this, CEER report suggested that for customers who feel that having an electricity contract based on GOs does not in itself respond fully to their expectations, labels can be a possible solution, under certain circumstances. Labels that add value by guaranteeing that additional criteria are being met, can cater for the more demanding customers willing to actively contribute to investment in renewable production. Widely used standards, such as Greenhouse Gas Protocol and LEED, encourage consumers to buy labelled electricity.
- Among the additionalities that labels claim are the promotion of the use of and investment in new renewable power plants, focus on age criteria (special requirements for the age structure of plants to enable targeted promotion of new power plants which need additional support in order to run economically viable) and other environmental protection initiatives. (More information can be found on links of the listed certified labels and on: <http://www.thesouthpolegroup.com/sustainability-solutions/guarantees-of-origin>)
- In addition, EMAS BEMP report authors expressed that the requirement for traceability and exclusive accounting of renewable electricity consumption provides a useful indication of

additionality and that another potential indicator is that purchased renewable electricity should originate from new capacity, installed within the past e.g. two years.

- Against this background, in TR3.0 it was suggested to have optional criteria that award those applicants purchasing the 100% labelled electricity. More points were allocated in this criterion recognising the effort on purchasing 100% RES and the potential environmental benefit from additionalities.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- Several stakeholders, especially from NGO side highlighted that the criterion as is worded is vague and does not ensure transparency and strictness of this criterion. They suggested that if environmental quality labels will be recommended by the EU Ecolabel, it should be assessed under which conditions such labels are regarded transparent and trustworthy in respect to additional environmental benefits.
- Against this background, in TR4.0, the criteria text has been further defined by specifying that the quality label's standard is verified by an independent organization (third party) to ensure transparency and reliability. In addition, it is suggested to include as a minimum the condition that the certified electricity originates from new renewable plant capacity installed within the past two years or promotes the investment in new renewable power capacities, aligned to EMAS BEMP report recommendation to ensure additionally and that RES is further promoted. In addition a link to the ecolabelindex is suggested to be introduced in the user manual as a guide to applicants and CBs for complying with this criterion. Ecolabelindex website offers updated information on the available labels, the type of verification and the web links of such labels.
- In TR 4.0, with regard to the request on giving prioritisation to green tariffs, the wording has been kept flexible recognising the different options, however conditions for the unbundle purchase has been introduced aligned to mandatory criterion and points have been allocated to recognise the different performance levels. Maximum of points are awarded only if green tariff with independent ecolabel is chosen among the available options.
- No substantial changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.7.12 Criterion 39: On site self-generation of electricity through renewable energy sources (up to 5 points)

Proposal for criterion 39: On site self-generation of electricity through renewable energy sources (up to 5 points)

The tourist accommodation shall have on site electricity generation from renewable energy sources as defined in Article 2(a) Directive 2009/28/EC, which may include: photovoltaic (solar panel) or local hydroelectric system, geothermal, local biomass or wind power electricity generation, that generates:

Proposal for criterion 39: On site self-generation of electricity through renewable energy sources (up to 5 points)

- a) At least 10% of the overall electricity consumption per year (1 point).
- b) At least 20% of the overall electricity consumption per year (3 points).
- c) At least 50% of the overall electricity consumption per year (5 points)

As regards local biomass, while sustainability criteria for solid biomass are not yet in place, due account shall be taken of local biomass availability and other biomass uses in order to ensure an efficient use of the limited biomass available.

If the self-generation of renewable electricity leads to the issuing of Guarantees of Origin, the self-generation can only be taken into account if the Guarantees of Origin do not end up on the market, but are cancelled to cover the local consumption.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with documentation on the photovoltaic, hydroelectric, geothermal, biomass or wind power system and data on its actual output. The calculation of the % generated of the overall consumption of the previous year to the application can be used to demonstrate the capacity to fulfil this criterion.

Rationale of Proposed Criterion text

- BEMP is to “install on-site geothermal, solar or wind energy generation where appropriate”. The benchmark is: *“the equivalent of 50 % of the accommodation’s annual energy use is generated by on-site renewable sources”*.
- For the first proposal this criterion has been clarified to be better distinguished from current Criterion 1: Electricity from renewable energy sources. This criterion (unlike Criterion 1) refers specifically to on-site generation carried out by the tourist accommodation.
- In addition, it was suggested that the section referring to ‘Net amount to grid’ should be removed as this is not defined in the EMAS BEMP report and removes the focus from use of renewable energy by the tourist accommodation.
- The criterion was updated to allocate points where both 10% and 20% of electricity is generated by renewable energy sources, as suggested by stakeholder feedback. In addition, the use of on-site renewable energy generation has been clarified.
- Several stakeholders at the First Ad Hoc Working Group were in favour of making on site self-generation of electricity through renewable energy sources a mandatory criterion. However, the proposal recognises that access to on site self-generation is not widely available, especially in urban areas where many accommodation sites are located.
- A stakeholder suggested that a clause is included in the criterion that requires applicants, whose production leads to generation of Guarantees of Origin, that these Guarantees of Origin have to be cancelled on behalf of the local consumption to avoid that these GOs ending up on the market.
- Against the background it is proposed to keep the criterion optional. Hopefully, the mandatory criterion will encourage some 'demand pull' for the generation of electricity

from renewable sources and the optional criteria will reward those applicants that have already invested in onsite generation. Furthermore, the criteria title has been changed in order to clarify that the aim of the criteria is to encourage self-generated electricity from renewable energy, no matter if it is directly consumed or put into the grid that might be a usual practice in several countries. It is proposed that a requirement is included that specifies that applicants must cancel the GOs generated.

- In addition, it is suggested to align to the benchmark suggested in EMAS BEMP report and award extra points to those applicants reaching best level of environmental performance.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

- For the assessment and verification section, it is proposed that, at the time of application, the data gathered from the previous year for the calculation is valid, since this is a forecasting criterion.

3.7.13 Criterion 40: Heating energy from renewable energy sources (up to 3.5 points)

Proposal for criterion 40: Heating energy from renewable energy sources (up to 3.5 points)

- a) At least 70% of the total energy used to heat or cool either the rooms (1.5 points) and/or to heat sanitary water (1 point) shall come from renewable energy sources as defined in Article 2(a) of Directive 2009/28/EC
- b) 100% of the total energy used to heat or cool either the rooms (2 points) and/or to heat sanitary water (1.5 points) shall come from renewable energy sources as defined in Article 2(a) of Directive 2009/28/EC

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

Rationale of Proposed Criterion text

- BEMP is to encourage the use of renewable energy through either “on-site geothermal, solar or wind energy generation where appropriate”
- This is in line with the current EU Ecolabel criterion and no major changes have been introduced for the proposal.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- Minor changes have been introduced in TR4.0 to allow applicants to score depending on the use of the heat/cool and recognising the different levels of performance.

3.7.14 Criterion 41: Swimming pool heating (up to 1.5 points)

Proposal for criterion 41: Swimming pool heating (up to 1.5 points)

Proposal for criterion 41: Swimming pool heating (up to 1.5 points)

- a) At least 50% of the total energy used to heat swimming pool water shall come from renewable energy sources as defined in Article 2(a) of Directive 2009/28/EC (1 point)
- b) At least 95% of the total energy used to heat swimming pool water shall come from renewable energy sources as defined in Article 2(a) of Directive 2009/28/EC (1.5 point)

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

Rationale of Proposed Criterion text

- BEMP is to encourage the use of renewable energy.
- A stakeholder suggested lowering the 100% threshold to 95%. The stakeholder mentioned that the heat pumps used in combination with solar systems sometimes have technical problems. They mentioned that this issue may be relevant for many stakeholders using these systems.
- It is proposed to lower the threshold at 95% according to stakeholder request. This is not substantial change and may cover possible feasibility problems.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- No changes have been introduced since last version (TR3.0).

Rationale of proposed "Assessment and verification"

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

3.8 Optional criteria related to water

3.8.1 Criterion 42: Efficient water fittings: Bathroom taps and showers (up to 4 points)

Proposal for criterion 42: Efficient water fittings: Bathroom taps and showers (up to 4 points)

- a) The average water flow rate of the showers shall not exceed 7 litres/min and bathroom taps (except bathtubs) shall not exceed 6 litres/minute. (2 points)
- b) At least 50% of the bathroom taps and shower (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Commission Decision 2013/250/EU ⁽¹⁴⁾ or another ISO type I label. (2 points)

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

Proposal for criterion 42: Efficient water fittings: Bathroom taps and showers (up to 4 points)

Decision 2013/250/EU (14). Where other type I label products are used, applicant shall provide a copy of the ISO type I label certificate or packaging label.

Rationale of Proposed Criterion text

- EMAS BEMP report identifies water use in tourist accommodation as a significant environmental aspect. It is estimated that water can account for approximately 10% of utility bills in hotels, but this can vary considerably across different types of accommodation and is dependent on the facilities offered (for example a swimming pool or laundry facilities).
- BEMP for water flow is “to minimise water consumption through the installation of low-flow taps and showers” and proposes as a benchmark of excellence: Shower flow rate ≤ 7 L/min and bathroom tap flow rate ≤ 6 L/min.
- Initially it was proposed to set the threshold at 5 litres/minute; however several stakeholders suggested that could compromise customer experience and be difficult to achieve over many floors of a tourist accommodation or at a campsite.
- Against this background, it is suggested to compromise by adjusting the limit to 6 litres/minute, which is the limit requested in for EU Ecolabel sanitary tapware and is aligned to benchmark of excellence of EMAS BEMP report. Additionally, a requirement on labelled taps and shower heads has been proposed.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- In TR4.0, the requirement has been revised to fully align to the EMAS BEMP report benchmarks.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

- The assessment and verification text has been further specified and the use of the EU Ecolabel/other ISO Type I certification is suggested to be used as a means of verification.
- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates.

3.8.2 Criterion 43: Efficient water fittings: Toilets and urinals (up to 4.5 points)

Proposal for criterion 43: Efficient water fittings: Toilets and urinals (up to 4.5 points)

- a) All urinals shall use a waterless system. (1.5 point)
- b) At least 50% of urinals (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Commission Decision 2013/641/EU (15) or another ISO type I label. (1.5 point)
- c) At least 50% of toilets (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Commission Decision 2013/641/EU (15) or another ISO type I label. (1.5 point)

Proposal for criterion 43: Efficient water fittings: Toilets and urinals (up to 4.5 points)

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation. EU Ecolabel flushing toilets and urinals products and/or other ISO type I label having the above mentioned requirements will be deemed to comply. Where EU Ecolabel flushing toilets and urinals products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2013/641/EU (15). Where other ISO type I labels are used, applicant shall provide a copy of the type I label certificate or packaging label.

Rationale of Proposed Criterion text

- EMAS BEMP report identifies water use in tourist accommodation as a significant environmental aspect. It is estimated that water can account for approximately 10% of utility bills in hotels, but this can vary considerably across different types of accommodation and is dependent on the facilities offered (for example a swimming pool or laundry facilities) and advises the avoidance of continuous flushing of urinals.
- Best practice for WC flushing is to “minimise water consumption through the installation of low-flow taps and showers, shower-timer controls, and low- and dual-flush WCs”. Best practice for toilet flushing is to “minimise water consumption through the installation low- and dual-flush WCs” and the benchmark of excellence is average effective toilet flush ≤ 4.5 L and installation of waterless urinals.
- Current *criterion 54 WCs flushing* which limit the flush of toilets to 6L has been proposed to be included in mandatory criteria, however the limit has been adapted in order to recognise the mandatory character of the requirement. (See section 3.3.2)
- For optional criterion it is suggested to include a stricter requirement requesting labelled toilets and urinals however with the aim to recognise the lack of availability of these products on the market other ISO type I labels are accepted and as a minimum 50% of toilets/urinals is requested.
- The title has been reworded to reflect the change.
- All received comments and responses with regard to TR3.0 are gathered at the section 5.
- Minor modification has been introduced to align with existing optional criteria in waterless urinals.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

- The assessment and verification text has been further specified and the use of the EU Ecolabel/ISO type I certification is suggested to be used as a means of verification.
- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates.

3.8.3 Criterion 44: Dishwasher water consumption (2.5 points)

Proposal for criterion 44: Dishwasher water consumption (2.5 points)

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

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

Note: The criterion only applies to household dishwashers covered by the Commission Regulation (EU) No 1016/2010 ⁽²⁸⁾.

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

Rationale of Proposed Criterion text

- EMAS BEMP report promotes the selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption
- In the TR3.0, it was proposed to clarify the criterion by deleting reference to 'annual' in the calculation of water consumption and to align the requirement to the water consumption of best available technology on the market for household dishwashers at the time of entry into force of Commission Regulation (EU) No 1016/2010. Therefore, the revised proposal, it is proposed to align the water consumption thresholds to the benchmarks identified at the Ecodesign benchmark.
- In addition, as several criteria have been removed during this revision in order to simplify the criteria set, some points have been reallocated to other criteria in order to keep the scoring rules of the points system. It was therefore proposed that extra points were allocated to this criterion, since it is best practice identified in EMAS BEMP report and it applies to all household dishwashers in the accommodation that is considered to lead to a high potential savings.

⁽²⁸⁾Commission Regulation (EU) No 1016/2010 of 10 November 2010 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for household dishwashers (OJ L 293, 11.11.2010, p. 31).

- No modifications have been introduced since TR3.0.

Rationale of proposed "Assessment and verification"

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

3.8.4 Criterion 45: Washing machine water consumption (3 points)

Proposal for criterion 45: Washing machine water consumption (3 points)	
<p>The washing machines used within the tourist accommodation by guests and staff or those used by the tourist accommodation laundry service provider shall fulfil at least one of the following requirements:</p> <p>a) for household washing machines, their water consumption is lower or equal to the threshold as defined in the following table, measured according to EN 60456, using the standard washing cycle (60 °C cotton program):</p>	
Product sub-group	Water consumption: [litres/cycle]
Household washing machines with a rated capacity of 3 kg	39
Household washing machines with a rated capacity of 3,5 kg	39
Household washing machines with a rated capacity of 4,5 kg	40
Household washing machines with a rated capacity of 5 kg	39
Household washing machines with a rated capacity of 6 kg	37
Household washing machines with a rated capacity of 7 kg	43
Household washing machines with a rated capacity of 8 kg	56
;	
<p>b) for commercial or professional washing machines, they have an average laundry water consumption ≤ 7 L per kg of laundry washed.</p> <p><i>Note:</i> Point a) only applies to household washing machines covered by the Commission Regulation (EU) No 1015/2010.</p> <p><i>Assessment and verification:</i> The applicant shall provide technical specification from the professional technicians responsible for the manufacture, sale or maintenance of the washing machines. With the aim of showing compliance with criterion a) 220 total number of standard cleaning cycles per year shall be assumed in the case that only annual consumption is provided.</p>	

Rationale of Proposed Criterion text

- EMAS BEMP report promotes the selection of an appropriate size and type of efficient dishwasher/ washing machines with low water consumption and an average laundry water consumption ≤ 7 L per kg of laundry washed for commercial washing machines.
- In the TR3.0, it was proposed to align the water consumption thresholds to the Water consumption of best available technology on the market for household washing machines at the time of entry into force of Commission Regulation (EU) No 1015/2010.
- In addition a requirement aligned to EMAS BEMP report benchmarks on commercial washing machines has been introduced
- In addition, as several criteria have been removed during this revision in order to simplify the criteria set, some points have been reallocated to other criteria in order to keep the scoring rules of the points system. It is proposed that extra points are allocated to this criterion, as this is best practice identified in EMAS BEMP report it applies to all washing machines in the accommodation that is considered to lead to a high potential savings.
- No modifications have been introduced since TR3.0.

Rationale of proposed "Assessment and verification"

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

3.8.5 Criterion 46: Indications on water hardness (up to 1.5 points)

Proposal for criterion 46: Indications on water hardness (up to 1.5 points)

The applicant shall fulfil at least one of the following requirements:

- a) In proximity to sanitary areas/washing machines/dishwashers there shall be displayed explanations about local water hardness to allow better use of detergents by guests and staff (0.5 point)
- b) An automatic dosage system which optimises detergent use according to water hardness shall be used for washing machines/dishwashers used within the tourist accommodation by guests and staff (1.5 point)

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

Rationale of Proposed Criterion text

- EMAS BEMP report suggests that "in addition to training and signage, clear marking of fill levels on spray bottles can reduce the incidence of incorrect dilution. Dilution volumes should be adjusted for water hardness."
- The proposal is that the criterion is amended to clarify the wording and that the points allocated for providing information about local water hardness is lowered in order to recognise the lower level of investment compare to automatic dosage systems.

- No modifications have been introduced since TR3.0.

Rationale of proposed "Assessment and verification"

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

3.8.6 Criterion 47: Optimised pool management (up to 2.5 points)

Proposal for criterion 47: Optimised pool management (up to 2.5 points)
<p>a) Heated swimming pools and outside whirlpool shall be covered at night, and non-heated; filled swimming pools and outside whirlpool shall be covered when these are not used for more than a day to reduce evaporation (1 point).</p> <p>b) Swimming pools and outside whirlpool shall have an automatic system which optimises chlorine consumption through optimised dosing or use supplementary disinfection methods such as ozonation and UV treatment (0.5 point) or shall be of the natural type that incorporates natural plant-based filtration systems to achieve water purification to the required hygiene standard (1.5 points).</p> <p><i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation (e.g. photographs showing covers, automatic dosage systems or type of pool, documented procedure to use the automatic dosage systems).</i></p>

Rationale of Proposed Criterion text

- EMAS BEMP report for the operating of swimming pools does suggest:
 - The correct use of pool covers to reduce heat loss.
 - Minimisation of chlorine consumption through optimised dosing and use of supplementary disinfection methods such as ozonation and UV treatment.
 - In addition, natural pool installation is suggested: The on-site swimming pool(s) incorporate(s) natural plant-based filtration systems to achieve water purification to the required hygiene standard.
- This is in accordance with the current EU Ecolabel criterion however the criterion has been modified to better reflect the benchmarks of excellence suggested in EMAS BEMP report. The title has been amended to better reflect the aim of the criterion.
- In TR4.0 it is suggested to extend the scope of this criterion to outside whirlpools as a response of a stakeholder request. In addition, this is in line with EMAS BEMP report which address pools in general.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.8.7 Criterion 48: Rainwater and grey water recycling (up to 3 points)

Proposal for criterion 48: Rainwater and grey water recycling (up to 3 points)

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

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

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

Rationale of Proposed Criterion text

- BEMP for the use of rain and recycled water is to “install a grey water recovery system that recovers grey water for use in indoor processes (e.g. toilet flushing) following treatment or exterior processes (e.g. irrigation), or a rainwater collection system that uses rainwater for indoor purposes.”
- A stakeholder requested that more information is provided on what constitutes recycled water as this may vary outside the EU.
- The environmental program, Tripadvisor Greenleaders [Tripadvisor Greenleaders (2013)], awards points where alternative water is used in non-potable applications such as landscaping, flushing toilets, and fire suppression systems in the accommodation service.
- Alternative water sources are defined by Tripadvisor Greenleaders as the following:
 - *Reclaimed water, also known as grey water, is recycled waste water generated from laundry, showers, and lavatory sinks that is treated and reused. Greywater is captured separately from black water (water from toilets and kitchen sinks) and treated on-site instead of being sent to a municipal combined sewage treatment facility. Generally, on-site Grey water treatment is fairly minimal and does NOT result in potable (drinkable) water. To prevent consumption, treated grey water is often dyed and signage may be placed in restrooms.*
 - *Rainwater can be captured via rooftop and underground systems which channel the water into a cistern for later use.*
 - *Condensate is generated as a byproduct of HVAC systems when cooling air or water.*
- These sources help conserve water, lower energy usage from water treatment facilities, and reduce stress on sewage. It is proposed to align the proposed criteria to Tripadvisor Greenleaders to allow more comprehensive criteria which cover other types of alternative water source. The title and criteria have been modified to reflect the alignment

- No modifications have been introduced since TR3.0.

Rationale of proposed "Assessment and verification"

- Definitions of the alternative water sources will be included in the User Manual. In the assessment and verification section, appropriate further documentation has been specified by requesting photographs showing alternative water distribution systems.

3.8.8 Criterion 49: Efficient irrigation (1.5 points)

Proposal for criterion 49: Efficient irrigation (1.5 points)
<p>The applicant shall fulfil at least one of the following requirements:</p> <ul style="list-style-type: none"> a) The tourist accommodation shall have a documented procedure for watering outside areas/plants, including golf courts (if applicable), including details on how watering times have been optimised and water consumption minimised. This may, for example, include no watering of outside areas. (1.5 points), b) The tourist accommodation shall use an automatic system which optimises watering times and water consumption for outside areas/plants. (1.5 points) <p><i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation including details of the documented system/procedure for watering or photographs showing the automatic watering systems.</i></p>

Rationale of Proposed Criterion text

- The EMAS BEMP report does not specify that automatic watering systems are preferred (as does the EU Ecolabel criterion), but instead specifies that water consumption for irrigation should be minimised in general.
- A stakeholder suggested that changing the criterion to requiring a documented system/procedure for watering outside areas would constitute changing the criterion from a 'performance' criterion to a 'management' criterion which would make it difficult to verify. However, another stakeholder mentioned that trained staff could be even more efficient than automatic systems.
- It is suggested that the criterion allows the two systems, automatic and trained staff. It is also proposed that this criterion is rationalised to take into account the different systems. The criterion would then recognise the relative high investment required to introduce an automatic system. The title has been modified in order to reflect that automatic and efficient irrigation by staff are addressed.
- Minor modification has been introduced in TR4.0 with the aim to specify that golf courses shall be accounted for as outside area. High volume of water is used for golf courses irrigation. In addition the points have been finally balanced regarding that having an automatic system does not ensure that it is used efficiently; it may be more efficient to train staff.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.8.9 Criterion 50: Native or non-invasive alien species used in outdoor planting (up to 2 point)

Proposal for criterion 50: Native or non-invasive alien species used in outdoor planting (1.5 point)

During the validity period, the vegetation of outdoor areas, including any aquatic vegetation, shall be composed of native and/or non-invasive alien species and exclude invasive alien species of Union concern²⁹.

- a) absence of invasive alien species of Union concern (0,5 point) (other invasive alien species may be present)
- b) exclusively non-invasive alien species (1 point)
- c) native and/or non-invasive alien species (1.5 point)
- d) exclusively native species (2 point)

For the purposes of this EU Ecolabel, native species means plant species that occur naturally in the country.

For the purposes of this EU Ecolabel, non-invasive species means plant species that do not naturally occur in the country and for which there is no evidence that they reproduce, establish and spread easily or that they may have negative impacts on native biodiversity.

Outdoor planting shall exclude invasive alien species of Union concern within the meaning of Article 3(3) of Regulation (EU) No 1143/2014 of the European Parliament and of the Council³⁰.

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

Rationale of Proposed Criterion text

- BEMPs for tourist accommodation include "Planting of green areas with indigenous species to minimise irrigation requirements". However initially it was proposed to be removed on the basis of its low potential environmental benefit compare to other criteria.
- At the 2nd AHWG meeting most stakeholders strongly disagreed on the deletion of this criterion. They argued the crucial relevance of this criterion in relation to biodiversity and it was also highlighted that this criterion also aimed at irrigation saving in those regions under risk of drought.

²⁹ Invasive alien species of Union concern are listed under Regulation 1143/2014, see http://ec.europa.eu/environment/nature/invasivealien/index_en.htm

⁽³⁰⁾ Regulation (EU) No 1143/2014 of the European Parliament and of the Council of 22 October 2014 on the prevention and management of the introduction and spread of invasive alien species (OJ L 317, 4.11.2014, p. 35).

- Most comments pointed out that a suitable definition of 'indigenous' was needed to implement the criterion. In addition, several stakeholders mentioned the importance of including adapted species on the scope of this criterion.
- Minor modifications have been introduced in the criteria text in TR4.0 to address existing and future plantings and environmental benefits associated to native plants as requested by a stakeholder in the last consultation round (see section 5). In addition, terminology has been harmonised to EU policy on invasive alien species (IAS): (see: http://ec.europa.eu/environment/nature/invasivealien/index_en.htm)
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.9 Optional criteria related to waste and wastewater

3.9.1 Criterion 51: Paper products (up to 2 points)

Proposal for criterion 51: Paper products (up to 2 points)

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

- Toilet paper
- Tissue paper
- Office paper
- Printed paper
- Converted paper (e.g. envelopes)

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2014/256/EU of 2 May 2014 establishing the ecological criteria for the award of the EU Ecolabel for converted paper products⁽³¹⁾ and/or Commission Decision 2012/481/EU of 16 August 2012 establishing the ecological criteria for the award of the EU Ecolabel for printed paper⁽³²⁾ and/or Commission Decision 2011/332/EU of 7 June 2011 on establishing the ecological criteria for the award of the EU Ecolabel for copying and graphic paper⁽³³⁾ and/or Commission Decision 2009/568/EC of 9 July 2009 establishing the ecological criteria for the award of the Community Eco-label for tissue paper⁽³⁴⁾. Where other ISO type I label are used, applicant shall provide a copy of the type I label certificate or packaging label.

⁽³¹⁾ OJ L 135, 8.5.2014, p.24

⁽³²⁾ OJ L 223, 21.8.2012, p.55

⁽³³⁾ OJ L 149, 8.6.2011, p.12

⁽³⁴⁾ OJ L 197, 29.7.2009, p.87

Rationale of Proposed Criterion text

- EMAS BEMP report encourages minimisation of the use of resources, “especially paper and ink” and to “*select environmentally certified materials and services (e.g. printing services)*” where possible. Again, this is in line with the current EU Ecolabel criteria for paper products.
- Although this criterion does currently reflect best practice, it is suggested that the percentage of paper product required to obtain point is increased. There is now a very high market availability of these products and this should be reflected in the criteria update. Converted paper products are included, so envelopes are also within the scope of this criterion as suggested by stakeholder comments.
- For the same reason, it is proposed to reduce the awarded points according to the environmental benefit compared to other criteria, and the large availability of these products at competitive prices.
- No changes have been introduced since TR3.0 version.

Rationale of proposed "Assessment and verification"

- As suggested by the stakeholders, other ISO Type I labels are also valid for the compliance of this criterion.
- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates.

3.9.2 Criterion 52: Durable goods (up to 4 points)

Proposal for criterion 52: Durable goods (up to 4 points)

At least 40% (rounded to the next integer) of at least one of the following categories of durable goods (1 point for each category, to a maximum of 4 points):

- a) Bed-linen, towels and table clothes
- b) Computers
- c) Televisions
- d) Bed mattresses
- e) Furniture
- f) Vacuum cleaners
- g) Floor coverings
- h) Imaging equipment

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

Assessment and verification: The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2014/350/EU of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products ⁽³⁵⁾ and/or Commission Decision

⁽³⁵⁾ OJ L 174, 13.6.2014, p.45

Proposal for criterion 52: Durable goods (up to 4 points)

2009/300/EC of 12 March 2009 establishing the revised ecological criteria for the award of the Community Eco-label to televisions ⁽³⁶⁾ and/or Commission Decision 2014/391/EU of 23 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for bed mattresses ⁽³⁷⁾ and/or Commission Decision on establishing the ecological criteria for the award of the Community eco-label for wooden furniture ⁽³⁸⁾ and/or Commission Decision on establishing the ecological criteria for the award of the Community Ecolabel for wooden floor coverings⁽³⁹⁾ and/or Commission Decision 2009/607/EC of 9 July 2009 establishing the ecological criteria for the award of the Community eco-label to hard coverings ⁽⁴⁰⁾. Where other ISO type I label are used, applicant shall provide a copy of the type I label certificate or packaging label.

Rationale of Proposed Criterion text

- In general, EMAS BEMP report specifies that eco-labelled products (those certified to Type I schemes such as the EU Ecolabel) are preferable - environmental impacts have been considered and are minimised compared to other products on the market.
- This criterion can be updated to include any new EU Ecolabelled product groups which have become available since the previous revision of the TAS and CSS criteria.
- With the aim to increase the environmental benefit in the revised version while keeping this criterion doable, a compromise has been taken and 40% is proposed for this optional criterion. Some comments pointed out that the proposal of 50% might be unaffordable.
- No changes have been introduced since TR3.0 version.

Rationale of proposed "Assessment and verification"

- As suggested by the stakeholders, other ISO Type I labels are also valid for the compliance of this criterion.
- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates

3.9.3 Criterion 53: Beverages provision (2 points)

Proposal for criterion 53: Beverages provision (up to 2 points)

If beverages are offered (e.g. bar/restaurant service, shops and vending machines) under the ownership or the direct management of the tourist accommodation at least 50% (1point) or 70% (2points) of the beverages provision shall be on returnable/refillable containers.

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

⁽³⁶⁾ OJ L 82, 28.3.2009, p.3

⁽³⁷⁾ OJ L 184, 25.6.2014, p.18

⁽³⁸⁾ OJ L 320, 5.12.2009, p.23

⁽³⁹⁾ OJ L 8, 13.1.2010, p.32

⁽⁴⁰⁾ OJ L 208, 12.8.2009, p.21

Proposal for criterion 53: Beverages provision (up to 2 points)

documentation if relevant.

Rationale of Proposed Criterion text

- EMAS BEMP report promotes the importance re-using products, as outlined in the waste hierarchy:
 - a. **Reduce:** Create as little waste as possible by not producing it to begin with – implement green procurement, do not over-order, select products with little packaging or returnable packaging.
 - b. **Re-use:** Consider where certain items can be re-used, sold or donated to others that can use them.
 - c. **Sort:** Have a system in place for sorting everyday waste items such as bottles, cans, cardboard and paper for recycling. Consider what else might be recycled, taking into account local disposal possibilities.
 - d. **Recycle:** Send sorted waste for recycling.
- At the second proposal (TR2.0) it was proposed to merge under a single criterion the optional criterion that addresses disposable drink containers (O73: Disposable drink containers), with the criterion that encourages the tourist accommodation to offer beverages in returnable/refillable bottles (Criterion 86: Returnable or refillable bottles). The criterion has been renamed 'Beverages provision'.
- This criterion is awarding sites using returnable/refillable containers for beverage provision instead of disposable or recyclable plastic/cans (including vending machines). The wording has been amended to avoid the word disposable as suggested by stakeholders and a clarification about the scope of the criterion, which would apply to those beverages or services of the applicant's ownership or directly managed by the applicant.
- In TR4.0, in order to recognise the difficulties achieving this criterion, two levels of ambition have been introduced.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.9.4 Criterion 54: Detergents and toiletries procurement (up to 2 points)

Proposal for criterion 54: Detergents and toiletries procurement (up to 2 points)

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

- a) hand dishwashing detergents
- b) detergents for dishwashers
- c) laundry detergent
- d) all purpose cleaners
- e) sanitary detergents

Proposal for criterion 54: Detergents and toiletries procurement (up to 2 points)

- f) soaps and shampoos
- g) hair conditioner

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

Assessment and verification: The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2011/382/EU on establishing the ecological criteria for the award of the EU Ecolabel to hand dishwashing detergents ⁽⁴¹⁾ and/or Commission Decision 2011/263/EU of 28 April 2011 on establishing the ecological criteria for the award of the EU Ecolabel to detergents for dishwashers ⁽⁴²⁾ and/or Commission Decision 2011/264/EU of 28 April 2011 on establishing the ecological criteria for the award of the EU Ecolabel for laundry detergents ⁽⁴³⁾ and/or Commission Decision 2011/383/EU of 28 June 2011 on establishing the ecological criteria for the award of the EU Ecolabel to all-purpose cleaners and sanitary cleaners ⁽⁴⁴⁾ and/or Commission Decision 2014/893/EU of 9 December 2014 establishing the ecological criteria for the award of the EU Ecolabel for rinse-off cosmetic products⁽⁴⁵⁾. Where other ISO type I label are used, the applicant shall provide a copy of the type I label certificate or packaging label.

Rationale of Proposed Criterion text

- EMAS BEMP report suggests a benchmark of excellence for the use of detergents, which specifies that “at least 70% of the purchase volume of chemical cleaning products (excluding oven cleaners) for dish washing and cleaning are Ecolabelled”. The current EU Ecolabel criterion exceeds this benchmark and so does not need to be adjusted.
- The criterion is in line with the requirements of other schemes as Tripadvisor Greenleaders [Tripadvisor Greenleaders (2013)] which awards points to accommodation services that use certified cleaning products.
- Against this background, in TR3.0 it was proposed to retain the first proposed revised criterion. However the wording has been clarified using bullet points for each category as suggested by stakeholder feedback.
- No changes have been introduced since TR3.0 version.

Rationale of proposed "Assessment and verification"

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

⁽⁴¹⁾ OJ L 169, 29.6.2011, p.40

⁽⁴²⁾ OJ L 111, 30.4.2011, p.22

⁽⁴³⁾ OJ L 111, 30.4.2011, p.34

⁽⁴⁴⁾ OJ L 169, 29.6.2011, p.52

⁽⁴⁵⁾ OJ L 354, 11.12.2014, p.47

- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates.

3.9.5 Criterion 55: Minimisation of the use of cleaning products (1.5 point)

Proposal for criterion 55: Minimisation of the use of cleaning products (1.5 point)

The tourist accommodation shall have precise procedures for conducting cleaning product efficient cleaning method, such as use of micro-fibre products or other cleaning materials with similar effects and water cleaning activities or other cleaning activities with similar effects. To fulfil this criterion, all cleaning must be carried out by a cleaning product efficient cleaning method except where required by law or by hygiene or health and safety practices.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation if relevant (e.g. copy of procedures, technical details of products used).

Rationale of Proposed Criterion text

- There is no specific EMAS BEMP report guidance on mechanical cleaning but some comments on efficient cleaning methods:

“Best practice is also to train staff on the implementation of water- and chemical-efficient cleaning methods...”

- It is proposed that the requirements for this criterion are clarified – for an applicant to receive this point, all cleaning (unless required by law or contrary to proper hygiene practices) should be carried out as chemical-free. Although feedback suggested the use of natural product should also be allowed, this may cause problems in the verification stage in defining which products can be included under this definition.
- With regard to the proposal of deletion of several criteria under Detergents and disinfectants section, several stakeholders suggested to reintroduce some of them as are considered as easy points and give the chance and flexibility to score the minimum points needed to award the license.
- It was mentioned that change habits on disinfection has been a lot effort for license holders and that the impact is very important. To remove lot criteria under this section is considered a step back.
- It was pointed out by stakeholders that mechanical cleaning is better than using chemicals.
- Based on these recommendations, in TR3.0 the criterion on disinfectants was proposed to be part of the staff training criterion, while this criterion previously focused on mechanical cleaning was proposed to be formulated to cover any cleaning technique aimed at minimizing the use of chemicals.

- In TR4.0, minor amendments in the wording has been introduced as a response of a stakeholder request: "...Chemical use minimisation", "chemical-free" or "non-chemical" are rather unfortunate terms – micro-fibre products and other cleaning materials are also composed of chemical..."
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.9.6 Criterion 56: De-icing (1 point)

Proposal for criterion 56: De-icing (1 point)

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

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

Rationale of Proposed Criterion text

- BEMP primarily relates to minimising the use of chemicals on site, including those used for de-icing. However initially it was suggested to remove this criterion on the basis of its low potential environmental benefit compare to other criteria.
- As reply to the proposal to withdraw this criterion, many comments highlighted that it is a relevant criterion in cold climates, therefore it is suggested to be retained.
- Minor modification has been introduced in TR4.0 as a response to a stakeholder concern on the possibility that the applicant could score points even if the de-icing is carried out by an external agent (road maintenance provided by the local road authority).
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

- A detailed description and certificates if applicable are part of the assessment and verification.
- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates.

3.9.7 Criterion 57: Used textiles and furniture (up to 2 points)

Proposal for criterion 57: Used textiles and furniture (up to 2 points)

Proposal for criterion 57: Used textiles and furniture (up to 2 points)

Tourist accommodation shall have a procedure in place covering:

- a) All donation activities for all furniture and/or textiles that reach the end of their usable life within the tourist accommodation but are still usable. End users shall include charity, employees or other associations which collect and redistribute goods. (1 point)
- b) All reused/second-hand products procurement activities for furniture. Suppliers shall include second-hand markets or other associations/collectives which sell and/or redistribute used goods. (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 e.g. written procedure including end user contact details, receipts and records of goods previously reused or donated etc.

Rationale of Proposed Criterion text

- EMAS BEMP report promotes the importance of the waste hierarchy as follows:
 - Reduce:** Create as little waste as possible by not producing it to begin with – implement green procurement, do not over-order, select products with little packaging or returnable packaging.
 - Re-use:** Consider where certain items can be re-used, sold or donated to others that can use them.
 - Sort:** Have a system in place for sorting everyday waste items such as bottles, cans, cardboard and paper for recycling. Consider what else might be recycled, taking into account local disposal possibilities.
 - Recycle:** Send sorted waste for recycling.
- It was proposed in TR3.0 the criterion be clarified in order to specify that only products that are capable of reuse should be given to charity. In addition, the possibility to give the items to the employees has been included. Furthermore, it was suggested to remove the reference to electronic products as best practices concerning the end of life are to carry out controlled reuse and recycling activities, considering the toxic substances present in such products.
- In the last consultation, a stakeholder highlighted that in the current text, more value was given to those applicants who give articles instead than those who reuse them. Against this background, it is suggested in TR4.0 the criterion text be modified to recognise the potential environmental benefit associated to the reuse activities and to reflect waste hierarchy importance.
- No changes have been introduced since TR4.0 version.

Rationale of proposed "Assessment and verification"

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

3.9.8 Criterion 58: Composting (up to 2 points)

Proposal for criterion 58: Composting (up to 2 points)

The tourist accommodation shall separate at least one of following relevant waste

Proposal for criterion 58: Composting (up to 2 points)

category (1 point for each category, to a maximum of 2 points):

- a) yard waste
- b) food waste from the food services,
- c) biodegradable products (e.g. disposable items made of corn-based materials),
- d) biodegradable waste produced by guests at their room/accommodation,

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

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

Rationale of Proposed Criterion text

- EMAS BEMP report highlights the importance of properly managing food waste by first minimising avoidable waste. In addition, by ensuring “all organic waste is separated and sent for anaerobic digestion where available, or alternatively incineration with energy recovery or local/on-site composting.” Furthermore, the LCA review revealed that one of the authors reviewed suggested that the introduction of domestic solid waste composting would contribute to a reduction in the quantity of waste produced in this particular hotel. It is a simple activity and the necessary investment is low.
- The Tripadvisor Greenleaders scheme [Tripadvisor Greenleaders (2013)] awards points for each of the following materials which are composted:
 - Food waste which is compostable includes vegetable and fruit waste, anything made out of flour, grains, coffee grounds, and eggshells.
 - Yard waste includes leaves, grass clippings, and dead plants.
 - Biodegradable products include disposable food service items and packaging, such as corn-based materials. Always double check that something is compostable before attempting to compost it.
- It is proposed to keep the revised criteria. It is suggested that the criterion is aligned to Trip advisor Greenleaders and that biogas production is also included as recycling process, which also provides a source of energy as suggested by stakeholder’s comments. Information related to composting methods and relevant material waste could be included at the User Manual in order to reduce complexity.
- No modifications have been introduced since TR3.0.

Rationale of proposed "Assessment and verification"

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

3.9.9 Criterion 59: Waste water treatment (up to 3 points)

Proposal for criterion 59: Waste water treatment (3 points)

- a) If car washing facilities are offered within the tourist accommodation, it shall be allowed only in areas which are specially equipped to collect the water and

Proposal for criterion 59: Waste water treatment (3 points)

detergents used and channel them to the sewerage system. (1 point)

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

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

Rationale of Proposed Criterion text

- Current criterion O 66: Car washing only in specially outfitted areas, relates to waste water from car washing activities. EMAS BEMP report suggested that wastewater management is a relevant environmental aspect related to the accommodation and best practices to ensure proper wastewater treatment and facilitate this as best as possible.
- In addition, EMAS BEMP report suggests that where there is not access to centralized waste water treatment. In this later case, BEMP is to install an on-site waste water treatment system that treats waste water at least to secondary, and preferably to tertiary, level, and includes at least pretreatment to screen solids and settle particulate matter followed by efficient biological treatment (e.g. in a sequencing batch reactor) to remove a high proportion of COD, BOD, nitrogen and phosphorus from the final effluent. Sludge is treated and disposed of in an environmentally acceptable manner.
- Against this background, the proposed criterion covers therefore current criterion on wastewater management from car washing activities and benchmark suggested in EMAS BEMP report where no access to centralized waste water systems available, under a single optional criterion on wastewater treatment. The title has been reworded accordingly.
- No modifications have been introduced since TR3.0.

Rationale of proposed "Assessment and verification"

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

3.10 Optional criteria related to other criteria

3.10.1 Criterion 60: No smoking in rooms (1 point)

Proposal for criterion 60: No smoking in rooms (1 point)

No smoking shall be allowed in guests' rooms or rental accommodations.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion and documentary evidence such as pictures of the signs displayed inside the rooms or rental accommodations.

Rationale of Proposed Criterion text

- Taking into account that mandatory criterion bans smoking in all indoor common areas, the optional criterion is proposed to be modified to address the guest rooms.
- In the TR3.0, it was proposed to set two levels of compliance, granting the maximum score to the strictest one (100% no smoking rooms).
- In the last consultation round, a Competent Body suggested to remove optional criterion and make *no smoking*, mandatory (preferable), or, at least 90 % of rooms shall be non-smoking (mandatory) and one optional point if 100 % non-smoking. In TR4.0, this comment has been partially accepted and obligation on no smoking for at least 80% rooms/rental accommodations has been transferred to the mandatory criterion.
- No modifications have been introduced since TR4.0.

Rationale of proposed "Assessment and verification"

- The assessment and verification text has been aligned to the mandatory criterion.

3.10.2 Criterion 61: Social policy (up to 2 points)

Proposal for criterion 61: Social policy (up to 2 points)

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

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

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

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

Rationale of Proposed Criterion text

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

proposal which recommended the social criterion to be a step further from the minimum legal provisions.

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

Against this background, for the social requirements/criteria it was proposed the following approach in TR3.0:

Legal pre-requisites:

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

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

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

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

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

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

Optional criterion on social policy

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

- No modifications have been introduced since TR3.0.

Rationale of proposed "Assessment and verification"

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

3.10.3 Criterion 62: Maintenance vehicles (1 point)

Proposal for criterion 62: Maintenance vehicles (1 point)

No combustion motor vehicles shall be used for the maintenance of the tourist accommodation

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

Rationale of Proposed Criterion text

- BEMP is to regulate traffic effectively to ensure minimisation of emissions and to optimise air quality.
- For the second criteria proposal (TR2.0), it was suggested to merge O 77: Regulation of campsite traffic and O 78: Campsite generated traffic (See [annex I](#) for current criteria), and to make it applicable to all tourist accommodation services and not “campsites only”.
- In TR3.0, in order to recognise that the requirement on limiting the traffic to some specific hours (criterion 61.a) is relatively easy to achieve, the number of points has been reduced for this requirement (0.5 points). Instead, more points are awarded for applicants that do not use combustion vehicles (criterion 61.b). However, during last consultation it was highlighted by a stakeholder that limiting the traffic to some specific hours is definitively very easy requirement. Against this, in TR4.0 it is suggested to delete the requirement on the traffic regulation and to modify the title accordingly.
- No modifications have been introduced since TR4.0.

Rationale of proposed "Assessment and verification"

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

3.10.4 Criterion 63: Environmentally preferable means of transport offer (up to 2.5 points)

Proposal for criterion 63: Environmentally preferable means of transport offer (up to 2.5 points)

- a) The tourist accommodation shall provide at least one of following environmentally preferable means of transport offer to guests (1 point each, to a maximum of 2 points):
 - i. Electric vehicles for guests pick up service and/or for guest's leisure
 - ii. Plugs (charging stations) for electric vehicles
 - iii. At least 1 bike for every 5 pitches or rental accommodation units or rooms.
- b) The tourist accommodation shall have active partnerships with companies providing any of the following environmentally preferable means of transport detailed in requirement a). (0.5 point). "Active partnership" means an agreement between a tourist accommodation and a company hiring electric vehicles or bikes. Information on the active partnership shall be visible on site. Where the hire company is not based on the site of the tourist accommodation, some practical considerations shall be made (e.g. a bicycle hire company may deliver bikes to the tourist accommodation service).

Proposal for criterion 63: Environmentally preferable means of transport offer (up to 2.5 points)

Assessment and verification: The applicant shall provide an explanation of how the tourist accommodation fulfils this criterion together with appropriate supporting documentation and with any information to be provided to guests.

Rationale of Proposed Criterion text

- The promotion of more environmentally-friendly transport solutions is recommended by one of the LCA reviewed, as transportation is found to be an environmental hotspot when it is included within the LCA boundaries.
- The criterion proposal is aimed at providing the guests with more environmentally preferable means of transport, either owned by the applicant or by means of partnerships with service providers. This approach complements the mandatory criterion on information about public transport and other preferable means of transport. The availability of charging stations is also awarded since the lack of a suitable infrastructure might discourage the use of electrical vehicles.
- According to some comments, in TR3.0, the ratio "*bikes per guest*" was proposed to be modified to 1/5. It was also recommended that the bicycle hire company should be promoted by the applicant in order to make the guests aware of this service. It is also proposed to set some rules to have the bikes available at the TAS, where the company is located off site.
- In the last consultation, a stakeholder highlighted that the ratio based in guests instead of rooms would be too demanding. It has been accepted and the revised text (TR4.0) requests 1 bike for every 5 pitches and/or rental accommodation units and/or rooms which is still more ambitious than current criterion (3 bikes/50 rooms).
- No modifications have been introduced since TR3.0.

Rationale of proposed "Assessment and verification"

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

3.10.5 Criterion 64: Unsealed surfaces (1 point)

Proposal for criterion 64: Unsealed surfaces (1 point)

At least 90% of the open air area surface under management of the tourist accommodation is not covered with asphalt/cement or other sealing materials, which hinder proper drainage and airing of the soil.

Where rainwater and grey water is collected, the unused rainwater and grey water shall be treated and infiltrated on the open space parcel.

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

Rationale of Proposed Criterion text

- Current EMAS BEMP report references EU Ecolabel requirements as good practice in management of outside areas, including O 80: Unsealed surfaces.

- Unsealed surfaces allow an increase of water filtration and diminution of water pollution associated to runoff from sealed asphalt surfaces, leading to a positive impact on biodiversity and wastewater management.
- Minor modification has been introduced in TR4.0 to link to criteria 48. When rainwater is not reused it should be infiltrated in order not to contribute to run-off / overflows.
- No modifications have been introduced since TR4.0.

Rationale of proposed "Assessment and verification"

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

3.10.6 Criterion 65: Local and organic products (up to 3 points)

Proposal for criterion 65: Local and organic products (up to 4 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 point)
- The tourist accommodation actively chooses local suppliers of goods and services (1 point)
- At least 2 products (1 point) or 4 products (2 points) used in daily meal preparation and/or sold in the shop shall have been produced by organic farming methods, as laid down in Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products⁽⁴⁶⁾ (1 point)

For the purpose of this criterion local **means** within a 160 kilometres radius of the tourist accommodation.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. Where organic products are used, the applicant shall provide a copy of the product certificate or packaging label showing that it was awarded in accordance with the Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products ⁽⁴⁷⁾. In some countries, it is possible for restaurants and hotels to be awarded by some labelling schemes when they use only organic products. Where a tourist accommodation is awarded by these types of schemes (or similar) this information could be provided as evidence of compliance with this criterion.

Rationale of Proposed Criterion text

- BEMP for kitchens in tourist accommodation is to “assess food and drink supply chains to identify environmental hotspots and key control points, including choice editing of menus to avoid particularly damaging ingredients (e.g. some out-of-season fruit), and selection of environmentally-certified products.” In general, it is considered best practice to source all products locally and organic where possible.

⁽⁴⁶⁾ OJ L 189, 20.7.2007, p.1

⁽⁴⁷⁾ OJ L 189, 20.7.2007, p.1

- In addition many comparable labels for tourist accommodation include criteria on procuring local goods and services. Although the EU Ecolabel criterion does specific local food products, it was suggested for the second proposal (TR2.0) that this criterion could be broadened to include other local goods.
- Considering that current criteria 090.Local food products (up to 3 points) and 091. Organic food (up to 3 points) are closely related, it was decided to merge both criteria under a single criterion in TR3.0 with the aim to simplify the whole criteria set. This criterion will remain optional.
- Nevertheless, the definition of local might not be clear enough, therefore, it was proposed in TR3.0, to include a definition of 'local' as within a 160 kilometres radius of the tourist accommodation, aligned to the Sustainable Restoration Scheme. This figure is based on a survey carried out in the UK in 2008 (The Hartman Group, 2008)
- Minor amendment was introduced in the final text considering the request from a CB to increase the number of points of organic products requirement.

Rationale of proposed "Assessment and verification"

- In the case of organic products, the applicant will be requested to present a copy of the product certificate showing that it was awarded in accordance with the Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products. The certification according to national schemes for organic catering are also recognized as a proof of compliance.
- Minor modification has been introduced in TR4.0 to accept packaging label as a mean of proof with the aim to recognise the difficulties that applicants may face to have access to label certificates.

3.10.7 Criterion 66: Pesticide avoidance (2 points)

Proposal for criterion 66: Pesticide avoidance (2 points)
<p>Outside areas under management of the tourist accommodation shall be managed without any use of pesticides.</p> <p><i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation avoids the pests and manages the outside areas. This shall be checked during the on-site visit.</i></p>

Rationale of Proposed Criterion text

- Although organic gardening is not specified in EMAS BEMP report, best practise suggests minimising the use of pesticides and other chemicals throughout the tourist accommodation.
- At the TR3.0, the criterion text of current 070. *Organic gardening* (See [annex I](#) for current criteria) was proposed to be simplified in order to make it clearer and stricter by limiting it to the absolute banning of pesticide use in outside areas in line with EMAS BEMP report.

- It was specified that the scope of this criterion comprised the outside areas managed by the tourist accommodation.
- Minor modifications have been introduced in TR4.0 to set reliable criteria as suggested by a Competent Body.

Rationale of proposed "Assessment and verification"

- The applicant shall present a detailed explanation together appropriate supporting documentation by an expert.

3.10.8 Criterion 67: Additional environmental and social actions (up to 3 points)

Proposal for criterion 67: Additional environmental and social actions (up to 4 points)

The management of the tourist accommodation shall take actions, additional to those provided for by way of criteria in this Section or in Section A, to improve the environmental and/or social performance of the tourist accommodation.

a) Additional environmental actions (up to 0.5 points each, to a maximum of 2 points)

and/or

b) Additional social actions (up to 0.5 points each, to a maximum of 1 points):

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a full description (including documented environmental or and/or social benefits associated to the actions) of each additional action the applicant wishes to be taken into account.

Rationale of Proposed Criterion text

- According to the stakeholder's comments, this criterion offers flexibility for applicants to get additional points for best practices that are not collected in the criteria set. Some of these additional actions might be further taken into account to be part of the criteria set in future revisions.
- At the TR3.0, as a result from several stakeholders' requests, social actions were also proposed to be introduced in the revised criteria, which is in line with the new optional social criterion proposed in this revision.
- Regarding the risk of double-scoring, the stakeholders highlighted that the final decision on granting the points for this criterion is made by the auditor and the competent body, whose expertise and knowledge minimize this risk
- Minor modifications to better distinguish the two different types of actions has been introduced in TR4.0.

Rationale of proposed "Assessment and verification"

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

- In addition as requested by a Competent Body in the last consultation, it has been specified that documented benefits associated to the actions shall be provided for the assessment of this criterion.

4 Impact of changes to criteria compare to existing criteria

Criteria simplification:

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

The analysis was carried out for 623 Tourist accommodations (*107 Campsite services & 516 Tourist Accommodation services*) currently awarded with the EU Ecolabel. The complete analysis can be found in TR3.0. As a result, those criteria showing a low fulfilment level were definitively proposed for removal at the proposal (TR3). This exercise led to a deletion of 13 criteria.

In addition, requirements addressing the same hotspot have been merged where possible aiming to make simpler the whole criteria structure resulting in a total number of 67 criteria for the final proposal in contrast to the current set in force which consists of 97 criteria. (See Table 2 and Table 4).

Structure and scoring rules

An exercise of points' allocation has been carried out in order to keep the same structure and the scoring rules of the points system currently in force. The potential environmental benefit highlighted in LCA/EMAS BEMP report and the investment needed to implement the criteria as indicated by stakeholders, have been considered when allocating points. Additionally, criteria have been partially ordered to better reflect the environmental hotspots they address and as a result of stakeholders request on introducing criteria on management in first place.

Figure 6 and

Table 9 below compare the current and updated allocation of points per category, for tourist accommodation. This shows that although the criteria structure is updated, thanks to the proposed allocation of points, the overall impact of the simplification and ordering of criteria in points is limited.

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

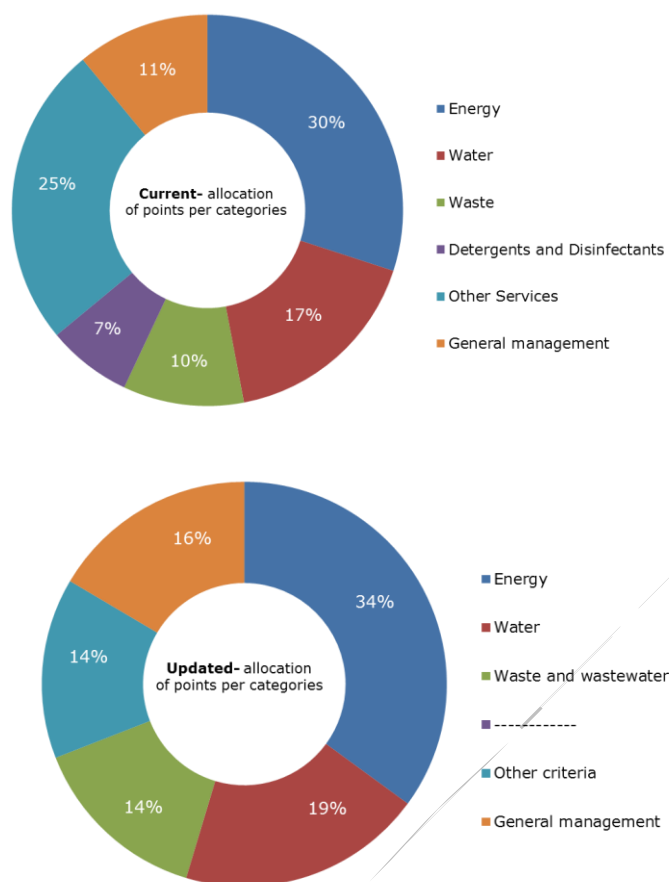


Table 9: Maximum number of points achievable for existing and final revised optional criteria

Criteria category	Tourist accommodation service (CSS)	Criteria category	Tourist accommodation product group
	existing - maximum points achievable		revised - maximum points achievable
Energy	36.5	Energy	45.5
Water	20	Water	24.5
Detergents and Disinfectants	12 (13)	-----	
Waste	9 (10)	Waste and wastewater	19.5
Other Services	30 (34)	Other Criteria	16.5
General Management	13.5	General Management	18
Overall available points	121(127)	Total score	124

The updated allocation of points does not impact significantly on the overall available points and therefore on the minimum percentage needed to award the label if current scoring rules are kept. **It is therefore proposed that the scoring rules remain the same.**

In TR30 it was suggested that at least one optional criterion shall be met in order to assure that applicants choose among all the five category sections covered in the criteria set. A text

was included in the Legal Preamble text with this regard. However a Competent Body has highlighted that it is very probable that this would happen without the need to specify in the text. This has also been shown in the indicative assessment below (Table 10) that shows that requirements under each section are accomplished for each of the selected scenarios. Therefore with the aim to simplify criteria text, this obligation has been deleted. The final preamble text remains as Commission Decision currently in force. (see the text below).

Preamble text extract. For more details on the wording consult the preamble published along with this TR4

Article 3

In order to be awarded the EU Ecolabel under Regulation (EC) No 66/2010, a tourist accommodation shall fulfil all of the following requirements as well as the related assessment requirements set out in the Annex to this Decision:

- (a) it shall comply with each of the criteria set out in Section A of the Annex to this Decision;
- (b) it shall comply with a sufficient number of the criteria set out in Section B of the Annex to this Decision in order to acquire the number of points required in accordance with Articles 4 and 5.

Article 4

1. For the purposes of Article 3(b), the tourist accommodation service shall acquire at least 20 points.
2. The minimum amount of points required in accordance with paragraph 1 shall be increased by the following:
 - (a) 3 points where food services are provided by the management or owner of the tourist accommodation service;
 - (b) 3 points where green areas are made available to guests by the management or owner of the tourist accommodation service;
 - (c) 3 points where leisure or fitness facilities are offered by the management or owner of the tourist accommodation service or 5 points if those leisure or fitness facilities consist in a wellness centre accessible to non-residents.

Article 5

1. For the purposes of Article 3(b), the campsite service shall acquire at least 20 points or, where collective services are provided, 24 points.
2. The minimum requirement laid down in paragraph 1 shall be increased by the following:
 - (a) 3 points where food services are provided by the management or owner of the campsite service;
 - (b) 3 points where green areas are made available to guests by the management or owner of the campsite service;
 - (c) 3 points where leisure or fitness facilities are offered by the management or owner of the campsite service or 5 points if those leisure or fitness facilities consist in a wellness centre accessible to non-residents.

Ambition level:

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

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

Criterion 1 - Basis of an Environmental Management System

Criterion 3 - Information to guests

Criterion 4 - General maintenance

Criterion 5 - Consumption monitoring

Criterion 6 - Energy efficient space heating and water heating appliances

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

Criterion 9 (New) - Thermoregulation

Criterion 11 - Outside heating and air conditioning appliances

Criterion 12 - Procurement of electricity from a renewable electricity supplier

Criterion 14 - Efficient water fittings: Bathroom taps and showers

Criterion 17 - Waste prevention: Food service waste reduction plan

Criterion 18 - Waste prevention: Disposable items

Criterion 20 - No smoking in common areas and rooms

Criterion 21 - Promotion of environmentally preferable means of transport

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

Sample of 100 TAS:

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

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

- ☒ they have between 21 and 34 points

Sample of 40 campsites:

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

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

Criterion 24 - EMAS registration or ISO certification of suppliers (up to 5 points)

Criterion 25 (New) - Ecolabelled services (up to 4 points)

Criterion 28 - Energy efficient space heating and water heating appliances (up to 3 points)

Criterion 29 - Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)

Criterion 30 - Air-based heat pumps up to 100 kW heat output (3 points)

Criterion 31 - Energy efficient household appliances (up to 4 points)

Criterion 33 - Thermoregulation and window insulation (up to 4 points)

Criterion 37 - Space Heater NOx emissions (1.5 points)

Criterion 38 - Procurement of electricity from a renewable electricity supplier (4 points)

Criterion 39 - On site self-generation of electricity through renewable energy sources (up to 5 points)

Criterion 40 - Efficient water fittings: Bathroom taps and showers (up to 4 points)

- Criterion 43 - Efficient water fittings: Toilets and urinals (up to 4.5 points)
- Criterion 44 - Dishwasher water consumption (2.5 points)
- Criterion 45 - Washing machine water consumption (3 points)
- Criterion 47 - Optimised pool management (up to 3 points)
- Criterion 52 - Durable goods (up to 3 points)
- Criterion 53 - Beverages provision (2 points)
- Criterion 59 - Waste water treatment (up to 3 points)
- Criterion 60 - No smoking in rooms (1point)
- Criterion 61(New) - Social policy (up to 2 points)
- Criterion 63 - Environmentally preferable means of transport offer (up to 2.5 points)
- Criterion 66 - Pesticide avoidance (2 points)

The overall update may result in some additional burden on the tourist accommodation in terms of achieving some of the mandatory criteria and scoring some points in the optional criteria. However, in most cases, the proposal is aligned to benchmarks, other environmental labels and/or reflects market availability of certain products. In addition, specific difficulties expressed by stakeholders have been carefully considered especially in mandatory section and flexibility has been introduced where deemed necessary to keep the criteria feasible.

Indicative assessment of minimum point's achievement:

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

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

Table 10 shows the indicative points achievable for a tourist accommodation without auxiliary services in both scenarios described above.

Table 10: Maximum points available for tourist accommodation without food services, outside areas and fitness/wellness centres for each scenario

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

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

Updated optional criterion	Scenario A: -No access to Ecolabelled products/services -Medium investment/interventions	Scenario B: -Access to Ecolabelled products/services -Low investments/interventions
(up to 2 points)		
Criterion 55 - Cleaning products use minimisation (1.5 point)	1	1
Criterion 56 - De-icing (1 point)	0	0
Criterion 57 - Used textiles and furniture (up to 2 points)	2	2
Criterion 58 - Composting (up to 2 points)	0	0
Criterion 59 - Waste water treatment (up to 3 points)	0	0
Other criteria		
Criterion 60 - No smoking in rooms (1 point)	1	1
Criterion 61- Social policy (up to 2 points)	2	1
Criterion 62 - Tourist accommodation maintenance generated traffic (1 point)	0	0
Criterion 63 - Environmentally preferable means of transport offer (up to 2.5 points)	1.5	0.5
Criterion 64 - Unsealed surfaces (1 point)	0	0
Criterion 65 - Local and organic products (up to 3 points)	1	1
Criterion 66 - Pesticide avoidance (2 points)	0	0
Criterion 67 - Additional environmental and social actions (up to 4 points)	2	2
Tourist accommodation TOTAL	39	25.4

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

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

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

Two licence holders provided information on the points they will score under the revised criteria. A camping service providing additional services (in this scenario more there are more eligible criteria) passed from current 71.5 points to 46.5 points under the revised version. This shows the effective raise of ambition of the criteria; however the points are still above the minimum. It is expected that applicants will be somehow willing to perform better in order to maintain the lost points. In more limited scenario, a small bed and breakfast, which normally faces more difficulties on achieving the minimum points, they have passed from current 28.5 points to 26 points. This shows that number of points is achievable.

Although there is a clear raise of general ambition level it can be concluded that the updated proposal is still achievable. However, as suggested by a Competent Body it is proposed a longer transition period between the current and revised Commission Decisions to be allowed for this product group aiming to assimilate progressively the changes introduced in the criteria set. Instead of 12 months as currently proposed for other product groups, it is suggested to have a transition period of 20 months.

As a result of the revision it is expected to keep most of the current licensees most of whom are expected to move towards a better environmental performance associated to the

proposed ambition level (based on EMAS BEMP report/LCA results), while attracting new applicants as a consequence of a clearer and focused criteria set.



5 Stakeholder comments on TR3.0

	Comments received in AHWG2/written form	JRC IPTS response
General comments		
Ambition level, Simplification and criteria structure	<i>A CB mentioned that on their point of view the general ambition level was not increased.</i>	<p>The level has been raised through the deletion of non-relevant criteria (applicants will need to choose criteria associated to higher environmental benefit) and the inclusion of tougher thresholds in several criteria. Although, the total points are kept it would be more difficult to score a point.</p> <p>An indicative assessment to evaluate if the stricter revised criteria set is still achievable has been included within this document. Practical cases of current licence holders revealed a definitive loss of points that might be crucial for those applicants that are on the lower limit. It is expected that in order to keep the award an extra effort will be needed in many cases. (see section 4)</p>
	<i>I must say I am afraid we will lose a great number of certified accommodations because the level is much higher and a lot of "easy" criteria to achieve have been removed. Only the big and rich companies will be able to afford the new EU ecolabel I am afraid.</i>	An indicative assessment to evaluate if the stricter revised criteria set is still achievable has been included within this document.(see section 4)
	<i>To my opinion... going from 71.5 points to 46.5 points make the new assement method be too stringent... but it's only my opinion... If you want to keep the actual number of licence holders, that would need to be more "flexible" specificaly on "little</i>	

<i>points" where there is a lot of lost points...</i>	
<p><i>It will be difficult for candidates to obtain the required number of points</i></p> <p><i>Criteria 22,24,34,51,55 : accommodations almost never apply these criteria (22 : no EMAS in France, 24 : no ecolabelled services in France, 34 : not spread on France territory, only in a few places, 51 : only a few in France, 55 : Brittany not concerned)</i></p> <p><i>Criteria 90, 37,38,39 : very expensive to implement.</i></p> <p><i>Criteria 40, 46 : achievable only if accommodations have a pool.</i></p>	
<p><i>We need to have criterion easily achievable by the TAS. We have to think about the current license holders that can abandon the Ecolabel, because it' too stringent and difficult to achieve.</i></p> <p><i>We are worried about the actual proposition of optional points, because a lot of easy points have been removed and some new ones are difficult to achieve.</i></p> <p><i>Criterion 57 – last version - deleted : a prompt regulation of the water temperature is a must in a hotel. Lots of clients' reclaims are due to this problem. The fact that it is also a ecolabel criterion emphasizes another interest which is the potential water economy. It is important to keep it.</i></p>	
<p><i>The proposal contains still 66 criteria, of which 21 are mandatory and 45 are optional. This is an improvement from the ≈100 criteria in the first draft, but still this is too much. I am sure there is room for simplification.</i></p> <p><i>As a suggestion, several criteria do not address main/significant environmental impacts, as required by the EU Ecolabel Regulation, and should be removed.</i></p>	<p>Rejected</p> <p>In general criteria are in line with environmental aspects identified in LCA review/ EMAS BEMP report.</p> <p>With the aim to not lose licences, an analysis have been carried out for 623 Tourist accommodations currently awarded with the EU Ecolabel to know the level of fulfilment among the criteria considered to be of low environmental impact. Criteria having a low fulfilment degree compare to other optional criteria have been definitively removed.</p>
<p><i>- The new order of criteria, starting with general management is GREAT, it's important to have a set of criteria starting with management before speaking about "ground" criteria</i></p>	
<p><i>The new order of criteria, starting with general management is better. It's important to have a set of criteria starting</i></p>	

	<i>with management before speaking about "ground" criteria.</i>	
General assessment and verification section, pre-requisites and social criterion	<i>not the "competent body" itself will carry out the on site visit but an independent auditor or verification body.</i>	Rejected Current wording refers to Competent Body. As far as we understand CBs currently perform the on-site visit either with internal or external auditors. We do not see the need of specifying that external auditor may be contracted by the Competent Body (see section 2).
	<i>This should read: ... shall be paid "at least" at a minimum legal wage,...</i>	Accepted (see section 2)
	<i>As discussed at the working group meetings for the Cleaning Services, some countries don't regulate the minimum wages by legislation but by collective agreements. Please, check the wording in the latest draft for Cleaning Services criteria and revise the wording here accordingly.</i>	Accepted (see section 2)
	<i>- On p.4 you write that an initial on-site visit is mandatory before awarding... I just think about little structures like B&B. An initial audit on-site seems to be very costful... could you for exemple imagine to develop a system like an initial documentary audit and then a mystery tour as peridical control. My thought are the following : if we want to developp the knowledge of the label, we need to have more licence-holders... if we keep having on-site expensive visits for little B&B we have a lake of development on this kind of structure. Moreover... the force of this little structures is that the label is only based on the trust of 1 people (the owner), there is no training (because no employee), there is a huge time-investment.. Maybe you can consider this fact and imagine a "light process" for TASS with less than 5 rooms and/or less thant 2 employees... ? It will be easy to perform because on criterion 1 you ask for an internal audit... the CB can focus on 1/ the document provided and 2/ the comments after the internal audit.. This point is, to my opinion a critical point for the commercial development of the label..</i>	Rejected Current text in force already requires an initial on site visit. Most of stakeholders and Competent Bodies agree on the importance of having at least a mandatory on-site visit. (see section 2)
	<i>Social criteria. Denmark can support the wording as proposed, however with at least one voluntary action referred to in Criterion 60. BUT the text shall be set as a requirement. It will not be verified in the application process if only listed in the preamble. In addition we suggest to add the following in addition to the drafted text on wages: "In the absence of national legislation in this area, the company shall have a collective agreement with a trade union for its staff".</i>	Partially accepted (see section 2) It is suggested that considering that the EU Ecolabel is a label of excellence, all requirement addressing legislation to be located on the preconditions. The text explicitly says The applicant shall declare

		<p>and demonstrate the service's compliance with the pre-requisites. As far as we know The text on collective agreements has been partially accepted and introduced aligned to the cleaning services. Reference to trade union has not been included in order to recognise the difficulties that SMEs might face to have a collective agreement with a trade union.</p>
	<p>- Still on p.4 on point n°2 please note that the written contract is not mandatory in France... for exemple, I'm an employee here at Blue Océan and I have no written contract :) In France for an "normal" contract (Unlimited engagement contract), you can just have an oral agreement... in case of problem, the judge will inspect the pay slips Maybe on that part you can just have a reference to a "contract" (witch can be oral or written)</p>	<p>Rejected We see difficulties on the verification of oral contracts. As far as we know, a written contract is not a difficult procedure. In most of the EU countries a written agreement signed by the two parties are legally binding.</p>
	<p>direct random staff interview during on-site visit may be done but it can't be an alternative to the documentary evidence.</p>	<p>Accepted (see section 2)</p>
<p>Other issues</p>	<p>Question: quels sont les labels écologiques reconnus dans le cadre de ce référentiel ? (tout mon linge de lit et de bain est certifié IMO mais cela n'avait pas été pris en compte lors de ma première labellisation) Il serait bien de fournir une liste des labels acceptés dans le cadre du référentiel.</p>	<p>Partially accepted To make a list would be problematic as there are a lot Type I label on the market for different products and in addition they might appear new ones with the time. However it is suggested to introduce a link in the User manual to the ecolabel index website. This could be used by applicants and CBs to know the different ISO Type I label (Type I is a multi-attribute label developed by a third party) available on the market (see:</p>

		http://www.ecolabelindex.com/)
	<i>We don't understand the meaning of the heading "waste and wastewater" in this position here.</i>	The wording is aligned to Sectoral Reference Document EMAS. Criteria under this section cover waste and waste water requirements.
	<i>I'm adding our comment to the proposed EU Ecolabel criteria for Tourist Accommodation services. We don't have any substantial comments to other criteria and in the overall we are satisfied with the proposal as it is because it still means progress compared to the the current criteria.</i>	Accepted
	<p>Definitions <i>The more significant terms/expressions used in this Annex are defined as follows:</i></p> <ul style="list-style-type: none"> • <i><u>Hot water boilers:</u></i> • <i><u>Local space heating appliance:</u></i> • <i><u>Locally sourced:</u> grown no further than 100 km from the accommodation premises</i> • <i><u>Renewable energy sources:</u> Renewable non-fossil sources, such as wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases as defined in Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources. For the purposes of this Decision biomasses o biogas used as renewable energy sources shall be produced no further than 70 km from the power plant in which they are used ("short supply chain").</i> • <i><u>Space heaters:</u></i> • <i><u>Space heating generating capacity:</u></i> • <i><u>Third party certification:</u></i> • <i><u>Water based space heater/heating appliance:</u></i> • <i><u>Water based space heating system:</u></i> • <i><u>Water heater/water heating appliance:</u></i> • <i><u>Water heaters/heating appliance:</u></i> • <i><u>Water heating system:</u></i> <p><i>Comment: for the definitions above reference has to be made to european norms (Regulations, Directives, ecc) in</i></p>	<p>Partially accepted</p> <p>This product group consists in a large amount of criteria and refers to a high number of regulation (especially for appliances) to include the definitions for all the appliances may have a marked impact on the length of the legal text. Instead only key definitions are included in the criteria text and reference to regulation is made where relevant. However, we suggest to follow the current approach for this product group and to include a list of definitions on the User manual as currently done.</p>

	<p><i>force</i></p> <p><i>On behalf of the Italian competent body I'd like to ask the opinion of the Commission on a matter about the scope of the EU Ecolabel Decision referring to the tourist accommodation services (TAS). A potential Italian applicant would like to certify a "cruise-ship service" according to the EU Ecolabel criteria for TAS. He believes that he would be entitled to apply for such certification since the scope of Decision 2009/578/EC states that "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". The Italian CB observes that the definition of the scope of this product group additionally states that this service must be: "offered as a main service" while a cruise-ship service seems to offer as a main service a travel/transportation service that, since the trip may be long, also offers some additional services like a sheltered overnight accommodation.</i></p> <p><i>The Italian CB also notices that the criteria for TAS have not been conceived with reference to "moving services" as cruise-ship or other transportation systems including overnight shelters (like e. g. wagon-lit, trailers, general ferries). As a consequence some criteria (mandatory and optional) of Decision 2009/578/EC wouldn't be applicable to these kind of services. Additionally in that Decision there is no criteria regarding the naval engine and maritime regulations and other specific aspects to navigation.</i></p> <p><i>On the other hand the Italian CB notices that the implementation of the EU Ecolabel to the cruise-ship services would lead to a reduction of their environmental impacts while spreading the knowledge of the EU Ecolabel among a large number of those people using these services.</i></p> <p><i>The Italian CB would like to know the opinion of the Commission about the possibility to consider as included in the scope of Decision 2009/578/EC and/or of its incoming revision:</i></p> <ul style="list-style-type: none"> <i>- cruise-ship services as a whole or</i> <i>- the only part of the cruise-ship service not including the supporting naval structure.</i> 	<p>Rejected</p> <p>As far as we know, the idea of having these types of services in the scope was never mentioned and discussed.</p> <p>With regard to the current definition it is clear that cruise-ship services are excluded as their main service is transportation and/or pleasure voyages. However to prevent these types of services applying for the EU Ecolabel, in the current version we could propose an additional sentence saying:</p> <p>"services offering transportation and/or as pleasure voyages as a main services (e.g. cruise-ship, wagon-lit, trailers, general ferries) are excluded".</p> <p>It should be noted that these type of services have not been included in the technical analysis as well as their impact has not been evaluated. Although some of the criteria might fit, there is no any evidence collected on benchmarks. In addition none of the other environmental labels on accommodation services include these type of services.</p> <p>With the absence of technical analysis for these types of services it is seen as inappropriate to widen the scope taking into consideration that there might be</p>
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		additional environmental impacts not covered by criteria. We suggest having a discussion on this inclusion for next revision if you believe this is relevant. (see section 1.2.1)
Act	<p><i>supermarkets? does that mean that also supermarkets have to fulfill the criteria and be included into the audit? If yes, please delete "supermarkets" from this list.</i></p> <p><i>What's the difference between "shall comprise" in the second paragraph and "may include" in the third?</i></p>	<p>Partially accepted</p> <p>The text has been moved to campsite definition as it is in the current text in force.</p> <p>Where the criteria apply or exclude this type of services (e.g shops, vending machines, etc...) it has been particularly specified in the text.</p> <p>For the general criteria that apply to the whole accommodation services (e.g management, consumption monitoring...) this type of auxiliary services might be included.</p> <p>(See preamble published alongside this document)</p>
	<p><i>- It'sa really good idea to have 18 months to set up the new criteria! 12 month would have been really short because the changes are huge and we need to think that we (licence holders) have business to run!</i></p>	
	<p><i>12 months would have been too short. We also have to set up the audit of all the licenses holders (357), and 18 months is more realistic.</i></p>	
	<p><i>It is only relevant if there are also criteria defined.</i></p> <p><i>Thus we suggest to formuate like this:</i></p> <p><i>"if tourist accommodation services and/or campsite services provide food services, fitness and leisure activities, green areas and/or conference facilities they have to follow the requirements for those sectors of the present decision"</i></p>	<p>Rejected</p> <p>In the definition it is suggested to not include reference to the criteria compliance. However, where the criteria apply this type of services it has been</p>

		particularly specified in the text.
	<i>Plenty of other high quality eco-labels already exist at national, regional and even local level in most of the Member States. To increase the scope and effectiveness of the EU Ecolabel and to avoid confusion for consumers we support the idea that the European Ecolabel scheme should also act as an „umbrella-certificate“ for those ISO Type 1 tourism labels. Certified accommodations from those national and regional labels, which fulfil the requirements of ISO Type 1 and the the criteria set out in Section A of the Annex of this regulation would be automatically recognised as EU ecolabel certified.</i>	Rejected Although there are several ISO Type 1 labels on the Tourism sector, the criteria might differ from one to other scheme. This proposal might lead to licence holders having very different environmental performance in terms of mandatory requirements.
	<i>This requirement (b) should be reviewed, as it makes the system more complicated without significant positive aspects. Also accommodation with few services might have problems to fulfill optional criteria in all sections.</i>	Accepted (See preamble published alongside this document)
	<i>Please define „wellness centre“ in comparison to normal „leisure/fitness activities“; accessible for non residents?</i>	Accepted (See preamble published alongside this document)
	<i>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.</i> <i>Comment: the paragraph above seems to repeat the content of art. 2 (campsite service definition). Therefore, it should be re-written in a more clear way or deleted.</i> <i>....food services include breakfast and/or meals (lunch and/or dinner); 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.</i> <i>Comment: for the sake of clarity it should be stated that food services include all meals, not only breakfast. Referring to leisure facilities it seems not necessary to limit the scope of this decision to those that are within the accommodation grounds; the phrase “which are open to guests” might be added.</i> <i>.. (b) it shall comply with at least one criterion for each of the subsections (general management, energy,</i>	Partially accepted (See preamble published alongside this document)

	<p>water, waste and wastewater and other criteria) in section B. ...</p> <p><i>Comment: more flexibility would help the applicant obtain the EU Ecolabel</i></p> <p><i>The points referred to in paragraph 3 shall be increased by any of the following, if provided under the same management or ownership of the tourist accommodation service:</i></p> <p><i>(a) 3 points for food services;</i></p> <p><i>(b) 3 points for green/outside areas available to guests;</i></p> <p><i>(c) 3 points for leisure/fitness activities or 5 points if the leisure/fitness activity consists in a wellness centre.</i></p> <p><i>(5) The points referred to in paragraph 5 shall be increased by any of the following, if provided under the same management or ownership of the campsite service:</i></p> <p><i>(a) 3 points for food services;</i></p> <p><i>(b) 3 points for green/outside areas available to guests, which are not part of the campsite structure;</i></p> <p><i>(c) 3 points for leisure/fitness activities or 5 points if the leisure/fitness activity consists in a wellness centre.</i></p> <p><i>Comment: in Art. 3 paragraph numbers must be checked and changed where necessary. Referencing to the ownership (par. 5) should be deleted since it is not relevant to the application for the EU Ecolabel</i></p>	
Criteria proposal V3 (TR3.0)		
<p>Criterion 1 - Basis of an Environmental Management System</p>	<p><i>We propose to eliminate this new criterion proposal and keep the criterion as the Decision Commission 2009: "Policy setting and environmental program".</i></p> <p><i>European Ecolabel should not be a competitor of the EMAS. These European voluntary environmental qualification tools: EMAS and EU Ecolabel, should be aligned, complementary and congruent, but from our point of view it has not sense to try to reproduce EMAS requirement into EU Ecolabel criteria. We are particularly against to require an internal audit and a short environmental report.</i></p> <p><i>Ecolabels identify the best environmental products and services of the market and license-holders have to justify, in the renovation, that these products and services keep being at the top, the philosophy of ecolabelling systems is</i></p>	<p>Rejected</p> <p>Inclusion of a mandatory environmental plan was considered being crucial by a vast majority of stakeholders in order to better guide the implementation and continuous improvement with regard to the rest of criteria.</p> <p>The two voluntary frameworks can thus</p>

<p><i>different of the management systems.</i></p> <p><i>- I regret a little the proximity of several criteria with EMAS System... Ecolabel is not EMAS and the knowledge of this label for the public is higher than EMAS... so maybe sometimes, having EMAS as a reference looks like</i></p> <ul style="list-style-type: none"> <i>- 1/ too stringent and</i> <i>- 2/ not so important regarding the environmental impact of the EMAS analysis and 3/not important at all speaking about marketing around the label</i> <p><i>Nevertheless, Ecolabel is different than EMAS and the knowledge of this label for the public is higher than EMAS. We also have to take into account that EMAS is too stringent for TAS and could scare them.</i></p> <p><i>There are many references to EMAS in the new version but nobody knows what EMAS is in France.</i></p> <p><i>Certified accommodations are mainly very small businesses (1 to 3 people working), they can't afford to dedicate one person on environmental issues.</i></p>	<p>be effectively used together and, moreover, be complementary: the EU Ecolabel as the tool to communicate to the market that a certain service or product achieves a very high environmental performance and EMAS as the process to improve environmental performance at the organisation level.</p> <p>The current wording of the criterion just constitutes the 'Plan' stage of the Plan-Do-Check-Act principles (the basis of the management systems).</p>
<p><i>Comment: as already noticed by the IT CB as well as by many other CBs, this criterion has to be limited to an environmental policy document that includes the main environmental aspects and goals the applicant will deal with while running the service. The version of the criterion proposed by the EC would result in an overlapping between EU Ecolabel and EMAS as well as in an unacceptable burden for the applicant.</i></p> <p><i>Note: a sample/format of such a policy document should be provided in the UM</i></p>	<p>Criterion does not requires EMAS registration, criterion as worded requires the basis of an environmental management system:</p> <ul style="list-style-type: none"> <i>-Targets shall be set according EU Ecolabel criteria (the mandatory part and the applicable optional criteria)</i> <i>-If additional targets are set, it is suggested to use preferentially EMAS indicators.</i> <p><i>(See section3.1.1)</i></p>
<p><i>Criterion 1- Basis of an Environmental Management System - Criterion is not clearly determined especially what specific and to what extent to be taken into account environmental performance indicators that are listed in the reference document for tourism in EMAS. If applicants should meet the specified requirements (documents) many of applicants would have to solve this issue through counseling organizations, which for them means an additional financial burden. Given the above, we inclined to previous formulation of criteria and scale of its implementation. We think that set requirements in this way may be discouraging for a potential applicant and may represent a big administrative burden also bearing in mind that they do not have experience in the field of environmental</i></p>	<p>Partially accepted</p> <p>The wording has been slightly modified to highlight and better define the aim of the criterion:</p> <ul style="list-style-type: none"> <i>-Targets shall be set according EU Ecolabel criteria (the mandatory part and the applicable optional criteria)</i>

	<p><i>management.</i></p>	<p>-If additional targets are set, it is suggested to use preferentially EMAS indicators. The updated wording is clearer and will give higher flexibility to applicants while keeping the main aspects of an environmental management system. (See section3.1.1)</p>
	<p><i>Criterion 1. The internal audit shall be every year. This is also in line with criterion 5 where data are collected on an annual basis. In the point d) the correct term should be “management review” and not “environmental report”.</i></p>	<p>Partially accepted The internal evaluation is proposed to be carried out yearly.</p> <p>In order to simplify the criterion, it is proposed to withdraw the requirement on the environmental report, while specifying that correction actions should be derived from the internal evaluation, if they are needed to attain the targets. The criterion is proposed to be verified by the internal evaluation report which includes the correction actions (if needed). This would make the criterion easier to implement by SMEs, where the organizational structures do not enable to split up the manager of the organization from the responsible of the environmental management system, and therefore, the environmental (or management review) report would just mean to duplicate the reporting with no additional information. (See section3.1.1)</p>

	<p><i>I don't like the idea of "Environmental Management System" : it reminds me old courses about ISO14001 and some headaches on reading this norm... Can we keep the idea of a POLICY instead of the EMAS ?</i></p> <p><i>Point A : if I have to identify environmental impacts... that means a specific and technical knowledge. I use to have a training about that in 2014 in Paris, I never found the time here at Blue Ocean to identify each impact... That a too long and hard work for little independant companies in the tourism sector ! I won't be able to complete a full analysis here... It's totally IMPOSSIBLE for me !</i></p> <p><i>Point B : on the same way, it's too hard for us to have a environmental program regarding the BEMP on EMAS... we said in AHWG#1 that the aim of this new version of the criteria was to simplify the reading-comprehension... Having a reference on EMAS is not acceptable</i></p> <p><i>==> On this first criterion... it's <u>ABSOLUTLY IMPOSSIBLE</u> to comply for me ! I have a 2M€ income company with 10 permanent employees and up to 45 in high season... my job is to run a campsite... no to spend days on environmental analysis... Just remind that EE is not the only competitor on the market of Environmental certification. Actualy we have several quits in France (Laure can tell you) and asking an analysis like that is TOO STRINGENT...</i></p> <p><i>To conclude, I think that the actual version, adding an internal audit every 2 years is the best option !</i></p>	<p>The current wording of the criterion just constitutes the "Plan' stage of the Plan-Do-Check-Act principles (the basis of the management systems).</p> <p>Criterion does not requires EMAS registration, criterion as worded requires the basis of an environmental management system: -Targets shall be set according EU Ecolabel criteria (the mandatory part and the applicable optional criteria) -If additional targets are set, it is suggested to use preferentially EMAS indicators. (See section3.1.1)</p>
<p>Criterion 2 - Staff training</p>	<p><i>Written procedures or manuals, could be complicated esp. for micro and small enterprises.</i></p>	<p>Rejected These type of documentation is needed not only to ensure that the training activities are carried out and its control, but also for its verification. (See section3.1.2)</p>
	<p><i>The tourist accommodation shall provide information and training to the staff (including subcontracted external staff), including written procedures or manuals, to ensure the application of environmental measures <u>respect of the EU Ecolabel mandatory and applicable optional criteria</u> and to raise awareness of environmentally responsible</i></p>	<p>Rejected The wording as currently proposed is felt to be clear. With regard to the optional criterion on</p>

	<p>behaviour in accordance with them mandatory and applicable optional criteria in this EU Ecolabel. In particular, the following aspects shall be included on the staff training:</p> <p>i. Environmental policy and action plan of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation.</p> <p>ii. Energy saving actions in relation to lights, air conditioning and heating systems when the staff leave the room and/or windows are opened.</p> <p>iii. Water saving actions in relation to leaks checking, watering, changes of sheets and towels frequency and backwashing pool procedure.</p> <p>iv. Chemical use minimisation actions in relation to chemical products for cleaning, dishwashing, sanitising, laundry and other special cleaners (e.g. swimming pool backwashing) which shall be used only where they are necessary and if information available, the consumption limits of the mentioned products shall be those indicated on the packaging or with the minimum dosage recommended by the producer. <u>Procedures for conducting chemical-free cleaning, such as use of micro-fibre products or other non-chemical cleaning materials or activities with similar effects should be available to staff.</u></p> <p><u>Comment: the provision about chemical-free cleaning procedures for staff has been moved from criterion 54</u></p> <p>v. Waste reduction and separation actions in relation to disposable items and disposal categories.</p> <p>vi. Environmentally preferable means of transport available to staff.</p> <p>b) Adequate training shall be provided to all new staff within four weeks of starting employment and an update on the above points for all other staff at least once a year <u>every two years.</u></p>	<p>chemical free cleaning methods, it is suggested to keep this requirement as optional and give the opportunity to score extra points to those applicants conducting this type of cleaning. Current wording is open, staff training on chemical use minimisation actions in relation to chemical products for cleaning covers mechanical cleaning of water cleaning if the optional criterion is applicable for a specific applicant. It is suggested to keep the update of the training yearly as current text in force. (See section3.1.2)</p>
	<p>BEUC and the EEB welcome the requirement stating that training to staff shall include “environmentally preferable means of transport <u>available to staff.</u>” In addition, staff members should also be able to inform and encourage guests to use public transport. Therefore, the criterion should also state “Environmentally preferable means of transport <u>available to guests</u>”.</p>	<p>Accepted It is suggested to introduce a more general text to link staff training to information to guest criterion. (See section3.1.2)</p>
	<p>requirement vi, Add: “.....and guests” (meaning staff shall know and be able to give information about locally available env. means of transport for guests)</p>	
	<p><i>In 2012 the National Council for Packaging assess that 80% of the environmental footprint of food is due to the manufacturing process and not the packaging. That is why we propose to developp the criterion on food waste. We keep in mind that at this stage of the revision it is difficult to propose big change. Our proposals are not expensive and would not take a lot of time to implement.</i></p>	<p>Accepted (See section3.1.2)</p>

	<p>Please find below two proposals which would make a positive change for TAS and consumers :</p> <p>Display a poster in the breakfast room which would give advices to reduce it. Some researchers have shown that display a poster could reduce the food waste</p>	
Criterion 3 - Information to guests	<p>b) Guests shall be given a questionnaire (via internet or at reception) asking about (1) their views on these general environmental aspects of the tourist accommodation and (2) general customer satisfaction with the facilities and services of the tourist accommodation. A clear procedure which records customer comments, complaints, replies given and corrective actions taken shall be in place.</p> <p>Instead of "(via Internet or at reception)" I would put: "(via Internet or at premises)" since printed questionnaires are given at reception only in campsites while they are left in accommodation units in hotels and apartments.</p> <p>Add also „via (smartphone) application" (paragraph b)</p>	<p>Accepted (See section3.1.3)</p>
	<p>a sample/format of the information document and of the questionnaire should be provided in the UM.</p>	<p>Rejected Each TA provider will have their own actions. These will reflect their unique circumstances. It will be difficult to have a unique information format or questionnaire.</p>
Criterion 4 - General maintenance	<p>Critère 4 : il n'est pas habituel que la plomberie et les robinets fassent l'objet d'un contrat de maintenance ; ils ne peuvent pas être mis sur le même plan qu'un chauffage ou une climatisation/Criterion 4: it is not usual for plumbing and faucets are subject to a maintenance contract; they can not be on the same plane as heating or air conditioning</p>	<p>Rejected Criterion as it is proposed does not prevent applicant to have more than one contract to carry out the maintenance. In addition, regular inspection and maintenance of water system "leak points" and appliances is a benchmark in SRD EMAS on tourism sector. Against this, the criterion continues to be proposed as suggested at TR3.0. However wording has been slightly modified to be further aligned with Tripadvisor Greenleades scheme [Tripadvisor Greenleaders (2013)] and to give a higher degree of flexibility</p>
	<p>I just wonder how I'll have to prove my "general maintenance" on taps, toilets & urinals, sinks, plumbing...". I fully agree with Olivia when she spoke about general maintenance for technical devices like appliances using refrigerants or water heating appliances... but for water devices... I'm circumspect... really</p>	

		to applicants, aiming to recognise that different types of energy/water equipment might be present at the different accommodation types. (See section3.1.4)
	<p>Criterion 4 - General maintenance of appliances/devices</p> <p>Preventative ...</p> <p><i>All maintenance activities have to be registered in a specific maintenance register.</i></p>	Partially accepted (See section3.1.4)
Criterion 5 – Consumption monitoring	<p>– <i>For that competent bodies that have a large number of tourist services license-holders it is a hard work to require this data and compile it, also if the compilation is every two years. On the other hand, this information is not relevant for competent bodies and they do not threat it, they only collect it.</i></p> <p><i>For all that, we propose to delete this criterion or rewrite the Assessment and verification as: “The applicant shall provide a declaration of compliance with the criterion, together with a description of the collecting and monitoring procedures. The tourist accommodation shall collect this data every year and has it available under request of the CB.”</i></p>	Accepted (See section3.1.5)
	<p><i>In 2012 the National Council for Packaging assess that 80% of the environmental footprint of food is due to the manufacturing process and not the packaging. That is why we propose to developp the criterion on food waste. We keep in mind that at this stage of the revision it is difficult to propose big change. Our proposals are not expensive and would not take a lot of time to implement.</i></p> <p><i>Please find below two proposals which would make a positive change for TAS and consumers :</i></p> <ul style="list-style-type: none"> • Weigh the food waste once a week or once a month. <i>The methodology and the indicator would be explain in the criteria. We believe that the waste food cost is about 10% or 15% of the purchase price. The following manual has been written for restaurants, the waste food is the main source of significant economic savings (more important than electricity and water) : http://www.umih.fr/fr/Salle-de-presse/press-review/La-lutte-contre-le-gaspillage-un-enjeu-conomique-majeur-pour-les-entreprises</i> 	Partially accepted (See section3.1.5)
	<p>– <i>As said on AHWG#1 you will have to explain me how I need to determine my number of m² for a campsite... I think the kWh/guest/night is relevant, the kWh/m² can be for an hotel... but for a campsite...). For exemple last year I bought some 4People mobilhome for 25m²/each... this year my provider sells me 27m²/each for 4 people... what's the impact?... I don't know</i></p>	Partially accepted There is flexibility of indicators (kWh/guest night and/or kWh/m ² ·year).

<p>=> <i>The relation to m² isn't relevant !</i> <i>another hand, to my opinion, if you want to have a global analisis at the european level of the consumption of chemical products you'll have to get it in Kg... it's very easy to change L in kg using the density... so you can have everything in Kg</i></p>	<p>Applicant might choose the one more suitable to measure its improvement. However as it is stated in current criteria in force indoor area for the m2 has been introduced. (See section3.1.5)</p>
<p><i>A Competent Body mentioned that data on consumption is collected yearly while the audit report is reported to CBs every two years and they asked for alignment. They suggested to the internal audit to be every 1 year could be a possibility.</i></p>	<p>Accepted (See section3.1.5)</p>
<p><i>A CB suggests to delete this criterion. This monitoring activity would result in an unacceptable burden for the applicant. On the other hand it is not clear by whom the collected data might be used.</i></p>	<p>Rejected Relevant BEMPs includes: "Undertake an energy audit and monitor energy consumption across key energy-consuming processes and areas (i.e. sub-metering) in order to identify efficient improvement options. In addition, EMAS BEMP report suggests that "appropriate environmental indicators are measured at the process level and associated with best practise techniques". Although CBs do not use data, the data collection and evaluation is one of the tools that applicants use in order to set consumption targets. Frequent collection for its internal management is very relevant then it is suggested to keep the frequency at suggested in TR3.0. Against this, no changes in the frequency of the collection of data have been introduced. However, in order to diminish the burden</p>

		<p>on data provision to Competent Bodies, it is suggested to require a short summary of the data collected which shall be provided together with internal evaluation report of criterion 1. This means that a short summary of the data collection is provided as soon as possible after the application and every two years in order to demonstrate compliance during the award period. (See section3.1.5)</p>
<p>Criterion 6 - Energy efficient space heating and water heating appliances</p>	<p><i>Criterion 6 Energy efficient space heating and waterheating appliances :point C : il me semble que les classes énergétiques ne s'appliquent pas aux équipements professionnels, et uniquement aux chauffe-eaux électriques, thermodynamiques ou solaires, les chauffe-eaux gaz ne sont pas concernés, mais celà n'apparaît pas clairement</i></p> <ul style="list-style-type: none"> ○ <i>point D : la Directive 2004/8/EC à laquelle fait référence ce point est abrogée depuis 3 ans déjà par la <u>Directive 2012/27/UE</u></i> ○ <i>point E :</i> <ul style="list-style-type: none"> ▪ <i>la référence suivante est erronée "Existing hot-water boilers fired with liquid or gaseous fuels as defined in the Council Directive 92/42/EEC shall comply with efficiency standards at least equivalent to three stars as stated in the Directive"</i> ▪ <i>Il faut savoir qu'initialement, cette Directive 92/42/CEE comportait une annexe II qui définissait des seuils de rendements 1/2/3/4 étoiles : cette annexe II a été abrogée en 2005 par la Directive 2005/32/CE (article 21)</i> <p>Water-based space heating appliances systems installed ...</p> <p>b) Local space heating appliances systems installed ...</p> <p>d) Existing cogeneration units shall comply with the definition of high efficiency in Directive 2004/8/EC of the European Parliament and of the Council of 11 February 2004 on the promotion of cogeneration based on a useful</p>	<p>Partially accepted</p> <p>A distinction for large appliances (> XXL) included.</p> <p>With regard to mentioned directive, as the requirement applies to existing appliances, the directives have been kept the same as current criterion in force. Although the star rating annex is not in force anymore, we can still refer to this annex for existing boilers. (See section3.2.1)</p> <p>Partially accepted</p> <p>The word <i>appliances</i> is felt to be more appropriate as it refers to the heater. Systems may cover radiators, heat exchangers, pipes and other parts for which the criteria are not applicable.</p>

<p><u>heat demand in the internal energy market.</u> <u>Comment: from the environmental point of view, cogeneration units seem to be in many cases preferable to other existing equipment. Thus, there is no need to define a performance threshold for them.</u> <u>d) hot-water boilers fired with liquid or gaseous fuels as defined in the Council Directive 92/42/EEC of 21 May 1992 on efficiency requirements for new hot-water boilers fired with liquid or gaseous fuels (8) installed within the duration of the EU Ecolabel licence shall comply with</u> e) Existing hot-water boilers fired with liquid or gaseous fuels as defined in the Council Directive 92/42/EEC of 21 May 1992 on efficiency requirements for new hot-water boilers fired with liquid or gaseous fuels (8) shall comply with efficiency standards at least equivalent to three stars as stated in the Directive. The efficiency of boilers excluded from Directive shall comply with the manufacturer's instructions and with national and local legislation on efficiency, but for such existing boilers (with the exception of biomass boilers) efficiency lower than 88% shall not be accepted. <u>Comment: a balance has to be made between duration and energy efficiency of boilers.</u> Assessment and verification: For requirements a, b) and c) and d) the license holder shall inform the Competent Body about the new installation within the duration of the EU Ecolabel licence of above mentioned appliances and provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the space and water heaters appliances indicating how the required efficiency is met. EU Ecolabel water-based heaters products will be deemed to comply with requirement a).ii. Other ISO type I label products having the above mentioned requirements will be deemed to comply. Where EU Ecolabel water-based heaters products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2014/314/EU(3). Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate <u>and indicate the ISO type I label requirements that are like the ones mentioned above.</u> For requirements d) and e) the applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the space and water heaters appliances indicating how the required efficiency is met.</p>	<p>With regards to cogeneration, its environmental performance depends on its efficiency. However the efficiency required is relatively easy to achieve for the cogeneration.</p> <p>A balance for existing boilers is difficult to be done at the mandatory part as there is a general concern among stakeholders about the cost of replacing all existing appliances. Furthermore there is an issue on the production of waste from equipment that is disposed of before reaching its end of life. Current wording in force is suggested to be kept for existing boilers and for new water heating appliances requirement c has to be fulfilled.</p> <p>With regard to the A&V section, In addition, the applicant is requested to indicate the ISO type I label requirements that that are like the ones mentioned in the criteria to facilitate verification when other type of labels.</p>
<p>As we told, we agree with the criteria for new water heaters but we propose to remove the criteria on existing hot-water boilers fired with liquid or gaseous fuels, criterion 6.e).</p> <p>Currently we do not have any tourist accommodation with hot-water boilers fired with liquid or gaseous fuels</p>	<p>Rejected The rating system based on stars was in force in Spain from 1997 to 2007 (Real Decreto 275/1995, Real Decreto</p>

	<p><i>because this requirement is too strict and it represents a huge investment for companies. It is not logical and has not sense from an environmental point of view to oblige companies to change the hot-water boiler if it is working well now.</i></p> <p><i>Currently we have 20 accommodation services and 1 campsite and all works with renewable energies.</i></p>	<p>1369/2007), and the Real Decreto 1027/2007 (RITE) forbids the installation of 2 stars boilers since January 2012. The current version of the criterion is in force since 2009 and the very same text is proposed for this criterion in this revision, in order to promote the phase out of low performance boilers, while acknowledging the efforts needed due to the long lifetime of boilers. (See section3.2.1)</p>
	<p><i>Requirements of this criterion are formulated very complicated, maybe try to reformualte it easier or to demand an investigation of the standard and refer to the action program if the requirements are not met.</i></p>	<p>Rejected The wording, it is needed to get the harmonization with the rest of product policies involved in this criterion. (See section3.2.1)</p>
<p>Criterion 7 - Energy efficient air conditioning and air-based heat pumps appliances</p>	<p><i>Criterion 7 - Energy Efficient air conditioning and air-based heat pumps appliances - How will we assess to meet this criterion for existing appliances? Criterion refers only to new installations.</i></p>	<p>Not applicable to existing ones (See section3.2.2)</p>
<p>Criterion 8 - Energy efficient lighting</p>	<p>BEUC and the EEB recommend raising the minimum rate of energy efficient light bulb from 40% to 60%.</p>	<p>Rejected With the aim to reduce the burden on verification first requirement was proposed to be in place on application instead of 1 year after the date of award. This also increases the level of ambition of the criterion and to increase the % would be too much a burden. This criterion has been highlighted by several</p>

		<p>licence holders to be quite difficult to achieve specially for large hotels. In addition a more ambitious criterion has been added in the optional section. (See section3.2.3)</p>
	<p><u>Criterion 8.</u> In the note physical characteristics shall be defined – if not in the document a reference shall be made to the UM for definition or examples.</p>	<p>Accepted <i>Physical characteristics</i> refers to those lamps having light bulbs which cannot be replaced by energy efficient light bulbs (reasons for the impossibility to replace lighting can be dimmer lighting, bulb diameter or lamp size) Clarification can be added in the User Manual. (See section3.2.3)</p>
	<p>THANK FOR NEW HOLDER to put back this time of 2 years !!! Speaking about energy efficiency if you let 2 years to new holders to reach the "normal" level, you can ask a little bit more that 80% ?... => 90% ??? This point is has an hight environmental impact... so maybe asking a little bit more with the 2 years can be a good idea !</p>	<p>Rejected This criterion is more flexible than current criterion in force. In addition, there is 18 months transition period for this commission decision that will help applicants to "reach the "normal" level". (See section3.2.3)</p>
	<p>Suggested wording: At the date of the EU Ecolabel licence award: i. At least 40% of all lighting in the tourist accommodation shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012 of 12 July 2012 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of electrical lamps and</p>	<p>Partially accepted The criterion at the mandatory section is proposed to be kept flexible as several stakeholders expressed difficulties on complying with this criterion and also concern in relation to the waste of bulbs.</p>

	<p>luminaires.</p> <p>ii. At least 50 <u>80</u>% of lighting that is situated where the lamps are likely to be turned on for more than five hours a day shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012(10).</p> <p>b) In maximum of 2 years from the date of the EU Ecolabel licence award:</p> <p>i. At least 80% of all lighting in the tourist accommodation shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012(10).</p> <p>ii. The 100% of lighting that is situated where the lamps are likely to be turned on for more than five hours a day shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012(10).</p> <p>b) <u>Lightings installed within the duration of the EU Ecolabel licence shall have at least Class A as defined in Commission Delegated Regulation (EU) No 874/2012 mentioned above.</u></p> <p>... First and second reports shall be provided at the application date and within a maximum of 2 years from the date of the award respectively. The license holder shall register the number of lamps and luminaires of Class A as defined in Commission Delegated Regulation (EU) No 874/2012(10) installed within the duration of the EU Ecolabel licence and shall make available the register to the Competent Body together with the supporting documents (purchase invoices).</p>	<p>However a more ambitious requirement has been introduced in the optional section. (see section 3.7.4)</p>
<p>Criterion 9 - Automatic switching off of appliances/devices</p>	<p><i>Critère 9 : Même si la mise en place d'un système automatique d'extinction des lumières n'est obligatoire que lors d'une rénovation, cela semble inutile et trop coûteux pour les petits établissements tels que les chambres d'hôtes (5 chambres maximum) : en général, le propriétaire travaille seul et vérifie les chambres et les lampes/ appareils électriques tous les jours après le départ des hôtes (c'est la même personne qui s'occupe aussi du ménage)</i></p> <p><i>Criterion 9 : Automatic switching off of appliances/devices</i></p> <p><i>In order to cover the different cases, it would be better to ask for "a centralized or an automatic system"</i></p> <p><i>Criterion 9 b) : this is an expensive system, it should not be mandatory.</i></p> <p><i>B) The requirement shall not be mandatory or only be valid if the technical possibility is given (e.g. sufficient wiring) and the installation does not lead to a non affordable burden (relevant esp. for small and micro enterprises). Additionally key cards are more unsafe than normal keys and hotels are starting to rebuilding it again to normal keys due to criminal attacks on the key card system.</i></p> <p><i>Criterion 9, Point b) "within the duration of the license" is not good enough. Automatic turn off shall be installed in all</i></p>	<p>Partially accepted</p> <p>It is finally proposed to exempt small accommodations of the compliance with this criterion based on the feedback with regard to the economic burden for small accommodations and that EMAS BEMP report highlights difficulties for this type of enterprises. The allowance also recognises that smaller enterprises have less impact compare to big accommodations. (See section 3.2.5)</p> <p>Accepted</p>

	<i>new rooms and when renovated, and not after.</i>	(See section3.2.5)
	<i>I read the criterion and I was thinking about the point "b" "automatic system"... It doesn't actually exist for campsites... I have centralized system on my new Mobil-homes (with a key) but the customer has to turn off the centralized key... it's not an automatic device like what you find on hotels with a card... Maybe you can have a reference to "centralized system which turn the lighting off"...</i>	Accepted (See section3.2.5)
	<i>Criterion 9 - Automatic switching off of appliances/devices HVAC and lighting</i>	Accepted (See section3.2.5)
Criterion 10 - Outside heating and air conditioning appliances	<i>We keep proposing to put this criterion optional because it represents a great handicap for many tourist companies in countries where these appliances for climatological reasons are much extended. We believe that mandatory criteria should be for the main environmental issues.</i>	Rejected Stakeholders were invited to choose either Option 1 (allow outside heating appliances which are powered by renewable energy) or Option 2 (ban all outside heating appliances). Most of the respondents that provided feedback favoured Option 2. The arguments in favour of Option 2 included: a) outdoor heating appliances are a waste of energy, b) that alternatives are available e.g. blankets and c) image incongruence: the use of outside heating would undermine the image of EU Ecolabel, and it would be hard to communicate to those guests who choose an Ecolabelled accommodation over non-labelled alternatives. (See section3.2.6)
	<i><u>Suggested wording: No outside heating and air conditioning appliances shall be used by the tourist accommodation services other than those completely powered by wind, solar, aérothermal, géothermal, hydrothermal and ocean energy.</u></i> <i><u>The applicant shall turn on these appliances only when effectively useful.</u></i> <i><u>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion and the supporting documents (the wind, solar, aérothermal, géothermal, hydrothermal or ocean energy provider and/or technical specifications from the manufacturer or the professional technicians responsible for installation, sale and/or maintenance of the outside heating and air conditioning appliances indicating how the criterion is respected. This will moreover be checked during the on-site visit.</u></i>	
	<i>The EEB and BEUC welcome the exclusion of outside heating in the criteria.</i>	
Criterion 11 -	<i>According to our expert for green electricity this allows "greenwashing" of electricity and shall not be allowed. Only</i>	Accepted (See section3.2.6) With regard to the unbundle purchase of

<p>Procurement of electricity from a renewable electricity supplier</p>	<p><i>certificates for green electricity from certain and named power plants shall be allowed.</i></p>	<p>GOs, the recently published Final Report “Reliable Disclosure Systems for Europe - Phase II” (RE-DISS II) emphasis that Member States should clarify the conditions under which the unbundle purchase is permitted: European countries should clarify whether and under which conditions the use of GOs by end consumers is allowed independently from the disclosure provided by their electricity suppliers. Such use of GOs should not be based on ex-domain cancellations performed in other countries. If consumers are allowed to use GOs independently, a correction should be implemented in the disclosure scheme which compensates for any “double disclosure” of energy consumed. While Germany does not allow the unbundle purchase, this option is very popular amongst LEED (Leadership in Energy & Environmental Design) certifiers and EU Ecolabel for Tourist Accommodation licence holders in France. (See http://www.green-access.com/). A high proportion of the current licence holders are using this route (unbundle purchase) to comply with current criterion. With regard to the NGO request on prioritizing the green tariffs, it is suggested to keep the same wording as it is suggested with the aim to keep it</p>
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		<p>simple and to give flexibility to licence holders. However in order to avoid the double counting of GOs risk associated to unbundle purchase, the conditions on AIB (Association of Issuing Bodies) accreditation of the GOs supplier and that the applicant has to prove that the amount of GOs acquired through unbundled purchased do match with the applicant's electricity consumption during an identical period of time have been introduced in the revised text. (See section3.2.7)</p>
	<p><i>Criterion 11 - Procurement of electricity from a renewable electricity supplier - We prefer to the original formulation of the criteria. Suggested formulation of criterion can cause obstacles to current and potential applicants.</i></p>	<p>Rejected Criterion text has been reworded with the help of experts in market electricity. As worded aims to recognise current situation while avoiding bad praxis, in particular in the unbundle purchase. (See section3.2.7)</p>
	<p><i>BEUC and the EEB strongly disagree with the criterion proposed on 'green electricity' in the current draft. The criterion is less ambitious than the one proposed in the version of the draft presented in May 2015 and does not sufficiently take into account significant developments in retail renewable electricity markets throughout the EU in the last years. The requirement does not provide a clear added value in relation to environmental benefits and is misleading for costumers that would expect the ecolabelled tourist accommodation accommodation uses 100% renewable electricity.</i></p> <p><i>Environmental and Consumer organisations would like to underline the relevance of this criterion as the development of renewable energies is key to fight climate change. Moreover, 'green electricity' markets have emerged during the last years and EU and national policy tools should converge to stimulate them even more through consumers and companies switching tariffs. In those Member States where suppliers currently sell 'green</i></p>	<p>Partially accepted Several CBs seriously suggested considering the mandatory 100 % in the next revision and keep 50 % for now. They claimed limited access to RES of the lincenceholders due to the higher prices of electricity from renewable sources. In addition they felt currently proposed criteria to set sufficient importance to the use of electricity from renewable sources</p>

<p><i>electricity' tariffs, the tourism sector can easily opt for such offers which are backed by Guarantees of Origin (GOs), the harmonised EU tracking tool for disclosure of the renewable share in the fuel mix.</i></p> <p><i>The EEB and BEUC strongly encourage the Commission and Member States to rethink the approach of this requirement. In particular the following aspects need to be addressed:</i></p> <ul style="list-style-type: none"> - <i>Increase the threshold for 'green electricity' from 50% to 100% in those countries where 'green electricity' tariffs are offered by at least three suppliers.</i> - <i>Allow the unbundled purchase of Guarantees of Origin only in those countries where the applicant cannot find more than three suppliers of a 'green' tariff backed by Guarantees of Origin, under the conditions that are detailed in our proposal. In that case, also 100% should be the target instead of the proposed 50%. Please see Annex I, where a text proposal is presented. Annex II, with a calculation for a range of small to huge hotels in France, shows that increasing the ambition level of the criterion is feasible and does not lead to significant financial or administrative burden to hotels.</i> <p><i>General remark on the role of GOs</i></p> <p><i>The use of GOs alone does not yet bring about any measurable environmental benefit since a GO is not a quality label but just a confirmation that one megawatt-hour of renewable electricity has been produced somewhere in a renewable power plant in Europe, nothing less and nothing more. Suppliers may still use this statistical value just to compile a 'green' tariff which has a 100% renewable façade built by GOs although they continue to produce and/or sell electricity generated in fossil fuel-fired power plants. Since in most Member States such misleading offers are not prevented by national legislation, the Ecolabel applicants ideally should opt for a green tariff from a supplier that ideally reinvests the revenues from this "green" tariff into additional renewable generation capacities.</i></p>	<p>as reflected in the proposed optional criterion, including a higher number of points offered. In addition, a CB compromised <u>to follow up the uptake of the optional criteria</u> with the aim to use the data as a basis for the proposal of 100% for next revision.</p> <p>Several licence holders claimed that although buying GOs appears to be a cheaper option in the countries where this practice is available; the increase from 50% to 100% may impose an extra economic burden that might be too much for applicants that are already investing money to comply with the whole criteria set. In addition, they mention that this criterion is already a reason of licence holders quitting the label or migrating to other certification schemes.</p> <p>Majority of EUEB members agreed this approach (50% mandatory/100% optional) in EUEB June 2015. A CB suggested monitoring the uptake of the optional 100% in order to collect data</p>
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<p>Switching to a 'green electricity' tariff covered by 100% renewable GOs</p> <p><i>(In countries with liberalised markets and 'green electricity' tariffs offered by at least three suppliers, for instance in France).</i></p>	<p>Unbundled purchase of renewable GOs</p> <p><i>(Only necessary in countries without liberalised markets and without 'green electricity' tariffs)</i></p>	<p>with the aim to set 100% mandatory in next revision.</p> <p>With regard to the unbundle purchase of GOs, the recently published Final Report "Reliable Disclosure Systems for Europe - Phase II" (RE-DISS II) emphasizes that Member States should clarify the conditions under which the unbundle purchase is permitted: European countries should clarify whether and under which conditions the use of GOs by end consumers is allowed independently from the disclosure provided by their electricity suppliers. Such use of GOs should not be based on ex-domain cancellations performed in other countries. If consumers are allowed to use GOs independently, a correction should be implemented in the disclosure scheme which compensates for any "double disclosure" of energy consumed. While Germany does not allow the unbundle purchase, this option is very popular amongst LEED (Leadership in Energy & Environmental Design) certifiers and EU Ecolabel for Tourist Accommodation licence holders in France. (See http://www.green-access.com/). A high proportion of the current licence holders are using this route (unbundle purchase) to comply with current criterion.</p>
<ul style="list-style-type: none"> ❖ <i>Requiring only 50% of green electricity is not ambitious enough and does not take into account the large number of 'green' offers that are provided at reasonable costs on many liberalised electricity markets in the majority of European countries. These 'green' offers mostly are tariffs backed by 100% GOs for renewable electricity.</i> ❖ <i>At present, there are <u>15 Member States</u> where suppliers sell 'green electricity' tariffs and the tourism sector can easily opt for such offers which are backed by GOs.</i> ❖ <i>By switching from the cheapest currently available non-renewable tariff to the cheapest 100% 'green' offer in France, hotels with <u>50.000 kWh of annual consumption</u> would pay <u>5 Euro more per year</u>. <u>Small hotels can even cut their electricity bill by around 20 Euro per year</u>. <u>Medium-sized hotels would pay approximately 4% more compared to the cheapest non-renewable tariff.</u></i> 	<ul style="list-style-type: none"> ❖ <i>Unbundled purchase of GOs independent of any purchase of electricity is much cheaper than purchasing a 'green' tariff from a supplier, so the 50% level is far too low.</i> ❖ <i>Even large hotels (200 rooms) that consume up to 50,000 kWh of electricity per year would have to pay a premium of <u>less than 2 Euro per year</u> (without eventual transaction costs) to increase the share of electricity covered by renewable GOs from 50% to 100%.</i> 	

<p>❖ For some countries (AT, DK, HR, LV, PT, SE), renewables already account for around 50% or more of the national average electricity production. This means that a number of suppliers in these countries are likely to already provide default electricity tariffs with a share of renewable energy sources in their fuel mix that is higher than 50%, and thus the 50% requirement would be meaningless in these cases.</p>		<p>In addition, although the tariffs offer is growing across EU as suggested by NGOs, the uptake across the accommodation sector might be still very low and would not represent 10-20% of the market on the tourism sector. SRD EMAS that was voted at the end 2015 document first benchmark on green electricity suggests the 50% RES due to the lack of information on RES share on the Tourism sector.</p> <p>Against this background, in TR4.0 it is suggested to keep the 50% and to require the 100% only in cases where the RES-E offer is competitive (at least 5 suppliers access) based on:</p> <ul style="list-style-type: none"> • several stakeholders from industry and Competent Bodies expressed that in certain countries there might have difficulties to access to competitive prices of green tariffs (if available) and/or to
<p>Annex I – Text proposal for criterion 11</p> <p>Criterion 11 – Procurement of electricity from a renewable electricity supplier</p> <p>(1) In case the tourist facilities are located in an EU or non-EU Member State having a liberalised electricity market with at least three suppliers providing so-called “green” electricity offers⁴⁸, i.e. tariffs that disclose a fuel mix containing 100% renewable energy sources⁴⁹, the tourist accommodation shall purchase 100% of its electricity consumed exclusively under such an electricity contract.</p> <p><i>This requirement is fulfilled either in case the overall fuel mix marketed by the supplier is disclosed as being 100% renewable or in case the product fuel mix of the purchased tariff is disclosed as being 100% renewable.</i></p>		

⁴⁸ Amongst the EU Member States, electricity suppliers offer at least one “green” tariff disclosing 100% renewable energy sources in its fuel mix in the following 15 national markets: Austria, Belgium, Denmark, Estonia, Finland, France, Germany, Italy, Luxembourg, the Netherlands, Portugal, Slovenia, Spain, Sweden, United Kingdom, see: Agency for the Cooperation of Energy Regulators (ACER)/Council of European Energy Regulators (CEER): Annual Report on the Results of Monitoring the Internal Electricity and Natural Gas Markets in 2013, October 2014, p. 42-45. “Green” tariffs are also available in the non-EU Member States Norway and Switzerland

⁴⁹ The annual mandatory fuel mix disclosure statement of the electricity supplier discloses a fuel mix with a share of 100% renewable energy sources. The renewable share is tracked and verified with the help of Guarantees of Origin (GOs) in compliance with the legal obligations on consumers’ right to be informed about the fuel mix, established in the Internal Electricity Market Directive 2009/72/EC, art. 3(9), and the Renewable Energy Directive 2009/28/EC, deliberations (52-54). Renewable energy sources are defined in the Renewable Energy Directive 2009/28/EC, art. 2.

<p>(2) The non abovementioned Member States are exempted from this requirement and are allowed to statistically convert the fuel mix of their electricity tariff to a share of 100% renewable energy sources through the unbundled purchase of Guarantees of Origin which are traded in line with the Principles and Rules of Operation of the European Energy Certificate System (EECS). However, this exemption applies only if the following conditions are met:</p> <ul style="list-style-type: none"> (a) If it is proven that there are not more than three renewable electricity tariffs backed by Guarantees of Origin (GO) available on the national electricity market; (b) If a request has been made to the local default electricity supplier and at least three other potential national suppliers for an electricity tariff that discloses a fuel mix of 100% renewable energy sources; (c) If the national regulations of both the exporting and the importing country provide domain protocols that were accredited by the Association of Issuing Bodies (AIB) under the Principles and Rules of Operation of the EECS in order to avoid double counting in case the customer opts for an unbundled purchase of GOs. <p>Assessment and verification:</p> <p>(1) <u>The applicant shall supply the annual fuel mix disclosure statement from and the contract with the electricity suppliers, indicating the nature of the renewable energy source(s), the countries of origin of the GOs and the percentage of electricity supplied that is from a renewable source.</u></p> <p>(2) <u>The applicant shall supply the declarations from the electricity suppliers to fulfil criterion 2.b and the contract(s) with the Guarantees of Origin supplier(s) indicating the nature of the renewable energy source(s), the countries of origin of the GOs and the percentage of electricity supplied that is from a renewable source.</u></p> <p><i>In case the applicant has opted for an unbundled purchase of GOs, a proof of the cancellation of the GOs shall be provided to the national Competent Body awarding the EU Ecolabel licenses. The applicant has to prove that the amount of GOs acquired through unbundled purchased do match with the applicant's electricity consumption during an identical period of time.</i></p> <p>Annex II. Estimations on additional costs for switching to a “green electricity” tariff and unbundled purchase of Guarantees of Origin (GOs) in France</p>	<p>allow the unbundled purchase.</p> <ul style="list-style-type: none"> • the 100% RES might be too much for majority of applicants that are already investing money to comply with the whole criteria set and there is high potential of losing current licence holders. • lack of the evidence on the uptake % RES share across the accommodation sector and alignment to first EMAS Sectoral Reference Document on Tourist accommodation benchmark. Alignment to EMAS has been relevant during the EU Ecolabel revision. To go beyond an EMAS benchmark in mandatory criteria could be too prescriptive. <p>With regard to the NGO request on prioritizing the green tariffs, it is suggested to keep the same approach as it was suggested in TR3.0 with the aim to keep it simple and to give flexibility to licence holders. However in order to avoid the double counting of GOs risk associated to unbundled purchase, the conditions on AIB (Association of Issuing Bodies) accreditation of the GOs supplier and that the applicant has to prove that the amount of GOs acquired through unbundled purchased do match with the</p>
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Option 1. Switching to a 'green electricity' tariff covered by 100% renewable GOs (in countries with liberalised markets and 'green electricity' tariffs offered by at least three suppliers like France)

✎ By switching from the cheapest non-renewable tariff to the cheapest 100% 'green' offer in France, hotels with 50,000 kWh of annual consumption would pay 5 Euro more per year. Small hotels can even cut their electricity bill by around 20 Euro per year. Medium-sized hotels would pay approximately 4% more compared to the cheapest non-renewable tariff.

✎ Up to a grid connection capacity of 36 kV, the number of 100% 'green' offers is always 10, thus there is a broad enough choice of 'green' tariffs even for energy-intensive huge hotels in France.

Research results of 100% 'green' offers covering the average annual electricity consumption of a hotel in 75011 Paris, 12 kV, tariffication base, without VAT, on the official online price comparison tool of the French regulator CRE.

	large hotel (>150 rooms)		medium-sized hotels (50-150 rooms)		small hotels (4-50 rooms)	
Number of rooms	200		100		10	
Electricity consumption (kWh/m ² /a)**	165	250	70	120	60	100
Average annual electricity consumption (kWh)	33000	50000	7000	12000	600	1000
Number of 100% 'green' offers covered by 100% RES GOs (*)	10	10	10	10	10	10
Number of 50% 'green' offers	0	0	0	0	0	0
Cheapest 100% 'green' offer (in Euros)	3917	5835	982	1546	231	279
Most expensive 100% 'green' offer (in Euros)	4852	7230	1216	1915	321	377
Cheapest non-renewable tariff	3913	5830	947	1487	253	299

applicant's electricity consumption during an identical period of time have been introduced in the revised text. In addition, in the optional criterion (see section 3.7.11), maximum of points are awarded only if green tariff with independent ecolabel is chosen among the available options.

In addition in order to further incentivise the optional 100% RES as much as possible:

-It is suggested to increase the scored points. (already done in TR3.0) (see section 3.7.11)

-It is suggested to modify the text in Criterion 22: Information appearing on the EU Ecolabel (see section 3.5.3) in order to recognise the different levels of promotion of renewable energies; more precise figures on the performance with regard to RES are suggested to be claimed. In addition, this could incentivize the use of higher % of RES, since applicants will have the possibility to communicate it. (See section 3.2.7)

Additional costs when switching from the cheapest non-renewable tariff to the cheapest 100% 'green' offer (in Euros)	4	5	35	59	-22	-20
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(*) Source: source: <http://comparateur-offres.energie-info.fr>

Option 2. Unbundled purchase of renewable GOs (only necessary in countries without liberalised markets and without 'green electricity' tariffs)

✎ Even large hotels (200 rooms) that consume up to 50,000 kWh of electricity per year would have to pay a premium of **less than 2 Euro per year** to increase the share of electricity covered by renewable GOs from 50% to 100%.

Results based on the lowest stock market price of one Guarantee of Origin (GO) for RES electricity per megawatt-hour of 0.07 Euro (*) without VAT and without additional transaction costs.

	large hotel (>150 rooms)		medium-sized hotels (50- 150 rooms)		small hotels (4-50 rooms)	
Number of rooms	200		100		10	
Electricity consumption (kWh/m ² /a)(**)	165	250	70	120	60	100
Average annual electricity consumption (kWh)	33000	50000	7000	12000	600	1000
Annual cost (Euro) for covering the hotel's electricity consumption with 100% RES GOs (in Euros) without transaction costs (traders etc.)	2.31	3.50	0.49	0.84	0.04	0.07
	1.16	1.75	0.25	0.42	0.02	0.04

Additional cost compared to covering the hotel's electricity consumption with 50% RES GOs (in Euros) without transaction costs (traders etc.)						
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(*) Source: European Energy Exchange (EEX): GO Nordic Hydro prices between 2013 and 2015, <http://www.eex.com/en/market-data/power/derivatives-market/guarantees-of-origin#!/2015/04/30>, 21 April 2015.
 (**) Source: Bohdanowicz et al.: Energy-efficiency and conservation in hotels – towards sustainable tourism, <http://www.greenthehotels.com/eng/BohdanowiczChurieKallhaugeMartinacHawaii2001.pdf>

- I appreciate the work you and your team did. But I also want to play 'my role', and especially after the 'enthusiasm' about the Paris Agreement, I want to plead once more for 100% renewable electricity contracts. The world is changing quickly around us. Solar and wind energy are booming, more and more large corporates publicly commit to 100% renewable electricity (And they calculate that percentage in the way as recommended by the Greenhouse Gas Protocol: based on reliable tracking instruments.) . See e.g. www.there100.org
- If large companies can do it, it is must also be possible for eco-labeled hotels: 100% renewable should be the starting point, not the 'extra'. None of the counter-arguments at the public hearing in May were convincing. Some were even utterly wrong.
- If some of your colleagues would like more background information about the technical details of green electricity contracts: we made a course about it for the network of Green Building Councils. The English version is online (<http://www.usgbc.org/education/sessions/green-power-how-buy-renewable-electricity-leed-and-carbon-accounting-9270893>). The German version has been submitted, but is apparently still under final review. And we are preparing a French and Russian translation.
 For extracts of the course, see also: https://www.youtube.com/watch?v=tXltgmoao_4 and <https://www.youtube.com/watch?v=h157XW250hg>
- About 'other markets, where green electricity contracts are currently not available': things are moving everywhere! (I am optimistic, as always...). E.g. we have been contacted by Russian authorities, to get more information about 100% renewable electricity contracts. So even there, the issue seems to be alive.

<p>- The RE100 group is right now considering rules and guidance for 'Leadership in Green electricity'. What does a company have to do, to go beyond 100% green. The final paper will be for later this year, but I have the impression that they will take chapter 11 of the Greenhouse Gas Protocol Scope 2 Guidance as a starting point.</p> <p>E.g.</p> <ol style="list-style-type: none"> 1) Is your company contracting directly with new low-carbon energy projects? (p.91) 2) Do you work with electricity suppliers for new projects? (p.91) 3) Have you established "eligibility criteria" for corporate energy procurement, relating to specific energy generation features or policy interactions that align with new low-carbon energy projects? (p.91) 4) Do you participate in voluntary certificate programs or supplier labels structuring their product so that a dedicated portion of the revenue from the program is applied as "incremental funding" for new projects, e.g. ecolabels such as EKOenergy (p.92) ? 5) Are you doing anything else to drive new low-carbon energy projects? 	
<p>A CB suggested following wording: The tourist accommodation shall contract at least 50100% of its electricity from renewable energy sources, as defined in Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources. Biomasses or biogas used as renewable energy sources shall be produced no further than 70 km from the power plant in which they are used (short supply chain). For this purpose:</p> <p>a) The tourist accommodation shall contract an individual purchase electricity tariff containing at least 50100% of the electricity from renewable energy sources. This requirement is fulfilled either in case the overall fuel mix marketed by the supplier is disclosed as being at least 50100% renewable or in case the product fuel mix of the purchased tariff electricity is disclosed as being at least 50100% renewable.</p> <p>b) Alternatively the minimum 50% renewable energy can also be acquired through the unbundled purchase of Guarantees of Origin which are traded in line with the Principles and Rules of Operation of the European Energy Certificate System (EECS). For this alternative, the following condition shall be met:</p> <p><u>Tourist accommodations that have no access to a supplier that offers the 100% electricity generated from the renewable energy sources defined above shall procure from the available supplier offering the highest share from renewable energy sources.</u></p>	

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

Note: This criterion does not apply if there are not suppliers offering the electricity ~~tariff~~ described above nor guarantees of origin where the accommodation is located. In these cases the electricity procured that doesn't come from renewable energy sources shall not be produced from coal nor from heavy oils having a sulphur content higher than 0.1%.

Binding contract restrictions (such as the provision of penalties in case of the change of power supplier) are considered as 'no access' to a market that offers electricity generated from renewable energy sources. In this case as soon as that contract expires, the applicant shall choose a new contract for the supply of electricity that fulfills the criterion and shall inform the CB.

Comment: the proposed 50% of electricity from renewable energy sources (that is in force since 2009) represents a level of ambition too low that has to be raised. A higher threshold wouldn't make it difficult to respect the criterion because the limit due to the availability of such electricity also applies.

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

~~According to Directive 2009/28/EC(11), 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. (Comment: previous section has been moved to definition section)~~

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

If relevant the applicant has to provide documents attesting binding restrictions in the contract in force.

Third party certification must be provided attesting that biomasses or biogases have been produced no further than 70 km from the power plant they feed.

Reactions to NGO side comments/proposal from several CBs and stakeholders

- We support the current wording of the proposal. Although we agree with raising the ambition level in general, this criterion is a "hot issue" for our licence holders because of the higher prices of electricity from renewable sources. We suggest seriously considering the mandatory 100 % in the next revision and keep 50 % for now. We think that for the currently proposed criteria set the importance of the use of electricity from renewable sources is well and sufficiently reflected in the proposed optional criterion 37, including a higher number of points (4p) offered.*
- Nowadays in Brittany, we have 62 certified accommodations, only 3 or 4 have a 100% renewable energy contract. It is very difficult when you present the ecolabel to explain that the label has a cost and moreover when they realized they also have to pay more for electricity. Energy is one of the highest expenses for tourist accommodations. Besides, in Brittany, we have a lot of accommodations using electricity for heating. So, it is expensive for them to pay 100% green electricity. I worked with tens of tourist accommodations now after 3 years doing my job. In my view, this is the most difficult criterion and sometimes, meetings with professionals stop after the presentation of the criterion because they want to do things properly but they have to pay more to obtain the ecolabel and more again for green electricity. They don't understand, they think it is not fair. They want to work better but to achieve this goal they have to pay more. So this criterion increased to 100% will be an encouragement for them to do nothing. It will be easier and cheaper for them.
In Brittany, if such a criterion appear in the new version, we would lose a lot of certified companies, around 70% I would say.
It may be a European strategy to make the certification harder but in my view, there is no point in making things so complicated that there is only a few certified accommodations at the end. Today, certified accommodations are already too few.*
- I use 210 000 Kwh/year and if I want 50%, the price is 3€/MWh of Green Energy (please find the documents attached)... so for 50% : $105 \times 3 = 315$. The price is not the main issue... the issue is the image of Green electricity as I mentioned on my previous mail... for CBs like AFNOR or for me when I explain the label **every** professional I speak with (every is in red because there is no exception!) find this criterion*

Partially accepted (See section 3.2.7)

absolutely idiot and not-environmentally friendly... Actually it's a capitalistic criterion witch make us pay the electricity more expensive when we keep using the same energy. Imagine at home if I ask you to buy you fuel (for the car) more expensive "because it's green"... You won't do it because EVERYBODY (you included) knows that it's impossible to have green fuel... or if you have green fuel, it's bio-fuel... and it's cheaper... As you are not crazy at home... you ask professionals to be crazy ? to pay more for something that DOES'NT EXIST ??

Should we make customers pay more for an EE holder hotel or campsite? of course not !!!

As said by myself and Julia (CCI Bretagne) at AHWG#1 this criterion is absolutely scientifically wrong so we are FULLY AGAINST this criterion! That's the result of a lobbying action witch has found solutions to make us pay more for the same product...So having 50% is a "good image" and the majority of my colleague is ready to hear it... But 100% you ask us to pay more for something a "normal person" would'nt do at home... We are not crazy.

On a second hand, I'm actually the President of the Ecolabel Club of Aquitania (France) and I spoke with Philippe Mangin (President of Ecolabel Club Poitou Charentes) : we actually, as Presidents, represent more than 30% of licence holders in all europe.

As Presidents we can say that we are ABSOLUTELY AGAINST the raising (60%, 70%... o more) and that this raising will make us loosing between 5 and 15 holders...

=> There is NO COMMUNICATION an NO KNOWLEDGE on this label?... why paying more for the same thing

- *to purchase 100% green energy will not be accepted and very unpopular for TAS. We already have informed our license holders that this point will not change, because most of them hesitate to renew their ECOLABEL.*

Some groups have already renegotiated their green contracts to purchase 50% for their sites.

For TAS, this criterion is only a merchant point. Buying green electricity is not an investment that improves their environmental impacts.

This criterion will mainly penalize French license holders. We have lots of complaints about this point and we already know that most of TAS will stop the ECOLABEL.

To leave the choice within the optional criterion is better. The idea to give more points to the optional criterion is really interesting.

	<p><i>It's better to think in energy savings rather than asking for buying more green electricity. We will follow this optional criterion in order to analyze the progress of its use, and obtain data. Furthermore, this market will evolve in time and the offer will grow.</i></p> <p><i>Criterion 11 : this should remain 50%. 100% would be too elitist.</i></p> <ul style="list-style-type: none"> <i>Regarding the ongoing work on this criteria and the fears exposed by Laure, the change proposed is too important. As explained by Laure, it is preferable to keep it in the optional criterion for the moment. A first step would consist of limiting energy consumption and a second one of purchasing green electricity (accross optional criterion and may be a mandatory 100% green electricity criterion in the next revision) In the current criteria the principle of reducing consumption is adopted for the 16th citerion accross food waste. Therefore we would have a consistent approach (saving consumption before looking for green alternatives).</i> <p><i>We agree to keep the 50%, to purchase 100% green energy will not be accepted and very unpopular for TAS. We already have informed our license holders that this point will not change, because most of them hesitate to renew their ECOLABEL. Some groups have already renegotiated their green contracts to purchase 50% for their sites.</i></p> <p><i>For TAS, this criterion is only a merchant point. Buying green electricity is not an investment that improves their environmental impacts.</i></p> <p><i>This criterion will mainly penalize French license holders. We have lots of complaints about this point and we already know that most of TAS will stop the ECOLABEL. To leave the choice within the optional criterion is better. The idea to give more points to the optional criterion is really interesting. It's better to think in energy savings rather than asking for buying more green electricity. We will follow this optional criterion in order to analyze the progress of its use, and obtain data. Furthermore, this market will evolve in time and the offer will grow.</i></p>	
<p>Criterion 12 - Coal and heavy oils</p>	<p><i>Critère 12 Coal and heavy oils : le terme "heavy oils" me semble vraiment inapproprié, car les fuels lourds ne peuvent pas être utilisés pas des services d'hébergement pour le chauffage ou la production d'eau chaude , en effet, ce produit pétrolier très visqueux est uniquement utilisé en fonderie ou éventuellement dans une centrale thermique... il me semble que poru rendre ce critère plus crédible, les termes adaptés seraient : en anglais et "fuel oil" ou "heating oil"</i></p>	<p>Accepted (See section3.2.8)</p>

	<p><i>en français "mazout" ou "fuel"/ Criterion 12 Coal and heavy oils: The term "heavy oils" really seems inappropriate because heavy fuel oils cannot be used not hosting services for heating or hot water, in fact, this oil product high viscosity is only used in foundries or éventuellement in a power plant ... I think poru make it more credible criterion, the appropriate words would be: in English and "fuel oil" or "heating oil" in French "oil" or "fuel"</i></p>	
	<p><i>No heavy oils having sulphur content higher than 0.1% and no coal shall be used as an energy source <u>in the accommodation grounds</u>.</i> <i>Note: This criterion only applies to tourist accommodations that have an independent heating/cooling system.</i></p>	<p>Rejected Current wording is felt to be clear. (See section3.2.8)</p>
<p>Criterion 13 – Efficient water fittings: Bathroom taps and showers</p>	<p><i>Suite à de récentes rencontres et échanges avec les équipes en charge du développement durable de l'hospitalité de luxe au sein du groupe LVMH et des Relais-Châteaux, il y a une volonté marquée de s'inscrire dans l'excellence environnementale (voir le nouveau Manifeste des Relais Châteaux porté par Roellinger http://static.relaischateaux.com/data/editorial/home/manifeste/confidentiel_relais-chateaux_manifeste.pdf) . En même temps, il y a le souhait que cela n'aïlle pas à l'encontre du confort perçu par les clients, comme par exemple les douches et l'expérience sensorielle qu'elles peuvent offrir.</i></p> <p><i>Dans le cadre de la révision des critères de l'Ecolabel européen en phase finale pour publication fin 2016 et usage jusqu'en 2022 a minima, il me semble important de s'assurer que ceux-ci prennent en compte les spécificités de ces hébergements.</i></p> <p><i>Par exemple, les critères comme celui de la gestion de l'eau passent actuellement par un débit maximum des robinets de douche. Est-ce qu'une approche alternative avec de nouvelles technologies de retraitement des eaux ne pourrait pas être envisagée tout en conservant un objectif de consommation d'eau potable finale par chambre ?</i></p> <p><i>L'Ecolabel Européen Hébergement touristique gagnerait beaucoup en terme d'image s'il était porté par de prestigieux établissements.</i> <i>Marcon en la matière est vraiment pionnier http://www.regismarcon.fr/ ainsi que le Negresco http://www.metronews.fr/nice-cannes/ecolabel-europeen-negresco-le-palace-qui-joue-sa-carte-ecolo/mnkp1zKrMvkuaZIOY/</i> <i>Cela serait intéressant de les consulter sur le sujet.</i></p>	<p>Partially accepted In order to reach a compromise a relaxed value is proposed 8.5l/m but still more ambitious than current criterion in place to allow an improvement. It is expected an smooth transition from current criterion to the updated one due to a slight increase of ambition and that a longer transition period is suggested to be allowed for this product group. In addition exclusion of bathtubs and other new showers are excluded regarding the mandatory character of this criterion. (See section3.3.1)</p>

	<p>What is meant with „bathroom taps“ and „average water flow“? If the average flow in one „certain standard“ bathroom (e.g. of the tap from the washbasin and a shower) shall not exceed 8l/min than it could be o.k. as the „standard“ shower then is allowed to have 10 or 12 l if the tap has 6 or 4 l.</p> <p>Nevertheless we are still favouring to keep the former limits or at least to allow a transition period for already certified accommodation. A stricter limit might require additional investment with low impact and could upset licencees.</p> <p>Also a water flow less than 10l in a shower is limiting the comfort of showering and might lead to dissatisfaction and complaints by guests.</p> <p>Additionally taps from bathtubs shall be excluded as a limited water flow leads to unnecessary long filling times. And finally specialised fittings (getting more and more popular) like rainshowers or massage-showers shall be excluded as well as sauna taps for cold water.</p> <p>We keep our opinion that would be dangerous to reduce the limit of water flow of showers to 8 litres/minute because most of the shower heads of the market have higher water flows. Taking into account, that it is a mandatory criterion, we propose to maintain the current limit of 9 litres/minutes for showers.</p> <p>OK for me, we already discussed about this limit at 8L... it seems to be reachable...</p>	
	<p>Suggested wording: 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; <u>Measurement of the water flow may be done (e.g. use by means of flowmeter or small bucket and a watch). EU Ecolabel sanitary tapware products and/or other ISO type I label products having the above mentioned requirements will be deemed to comply. Where EU Ecolabel sanitary tapware products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2013/250/EU of 21 May 2013 establishing the ecological criteria for the award of the EU Ecolabel for sanitary tapware (12). Where other ISO type I label products are used, applicant shall provide a copy of the ISO type I label certificate and indicate the ISO type I label requirements that that are like the ones mentioned above.</u></p>	<p>Partially accepted</p> <p>The applicant is requested to indicate the ISO type I label requirements that that are like the ones mentioned in the criteria to facilitate verification when other type of labels are used. (See section 3.3.1)</p>
<p>Criterion 14 - Efficient water fittings: urinals</p>	<p>Better ...have an „average flush“ ... as if systems are installed that allow two different flushs this might be sufficient-.</p> <p>Additionally sometimes more water is required to avoid plugging of sewer pipes.</p> <p>I don't have any "standard" because in fact, it depends on with flush brand you select..</p> <p>Many of ones you will find on stores are 3/6/9L flush : you can just fix the flush you want for the 'little' and 'full'</p>	<p>Partially accepted</p> <p>With regard to the difficulties to comply with mandatory criteria on toilets flux it is proposed to delete the mandatory</p>

<p><i>flush : in an hotel or campsite, 3 is too low, 6 could be a great average on the first view... but discussing that at lunch time with my colleagues, one told me that he had to use >8L because the pipes under the toilets are smaller than at home and some times in case of a lot of material to evacuate... 6L is to low for a campsite, so with this kind of flush... it needs more..</i></p> <p><i>My question will be : how do you make the measure...</i></p> <p><i>To my opinion again... this criterion was a good idea on the optionals... but isn't on the mandatory because :</i></p> <ul style="list-style-type: none"> - <i>Too difficult to control for CBs (you need to have bottles with water and see when the flush stop... when you can open the tank...)</i> - <i>Too risky for campsites... because if you put 7L on a mandatory criterion and if I can't reach this (I can't control the pipes already implanted on my floor...) I can't be awarded... I don't like it ;)</i> <p><i>Personally it's hard to fix 7L on flushes... and it's hard also (because it can be expensive...) to have the double flush mandatory (I'd have around 200 to change)...</i></p> <p><i>I personally tried to fix at 7L... sometimes when it's impossible to fix this limit... I put some stones on the tank (yes yes... stones...) but it seems to be a little bit... uncomfortable</i></p> <p><i>7L for a full flush is UNREACHABLE in a campsite. As I said at AHWG#1, try at home with your family... Sorry to be direct... but I did at home (we are only 2 adults) and during this 1-week test, we needed to flush twice at 2 moments...</i></p> <p><i>If you need to flush twice at home... imagine the result on an hotel or a campsite => people will complain, we will have to fix it... and the only way to fix it is to put the flush volume higher...</i></p>	<p>critterion on existing toilets and require the benchmark from EMAS BEMP report for new toilet installations. This is still more ambitious than current criteria which only address to urinals. (See section3.3.2)</p>
<p><i>Criterion 14 a) : it could be difficult to achieve in a hotel or campsite where water tanks are integrated in the wall.</i></p> <p><i>We have some license holders comments about this criterion. For them, 7L is too stringent. They ask for more flexibility, because they will have to invest too much to change the actual systems/devices.</i></p>	
<p><i>Without prejudice of the local or national regulation on toilets and urinals flushing:</i></p> <p><i>a) 100% of the toilets purchased within the duration period of EU Ecolabel at the accommodation (rounded to the next integer) shall have a full flush ≤ 7 litres</i></p> <p><i>⇒ b) At least 70% of the toilets at the accommodation (rounded to the next integer) shall have a full flush ≤ 7 litres</i></p> <p><i>⇒ c) Continuous flushing is not permitted in any urinal at the accommodation.</i></p>	

	<p><i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion together with appropriate supporting documentation. EU Ecolabel flushing toilets and urinals products and/or another ISO type I label toilets and urinals having the above mentioned requirements will be deemed to comply. Where EU Ecolabel toilets and urinals products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2013/641/EU of 7 November 2013 establishing the ecological criteria for the award of the EU Ecolabel for flushing toilets and urinals (13).Where other ISO type I label <u>products</u> are used, applicant shall provide a copy of the type I label certificate <u>and indicate the ISO type I label requirements that are like the ones mentioned above.</u></i></p>	
Criterion 15 – Reduction in laundry achieved through reuse of towels and bedclothes	<p><i>BEUC and the EEB welcome this requirement. However, it is necessary to add also this policy into the relevant staff trainings so that the measure is properly implemented. It would ensure that the room service personnel behave properly according to the policy of the accommodation regarding laundry washing.</i></p>	This is already covered in criterion 2 on staff training. (See section3.1.2)
	<p><i>Suggested wording: change sheets and towels by default at the frequency established by its environmental action <u>programme policy</u></i></p>	This type of actions is normally addressed in the action plan.
Criterion 16 – Waste prevention: Food service waste reduction plan	<p><i>Critère 16 : Waste prevention: Food service waste reduction plan</i></p> <ul style="list-style-type: none"> ○ <i>point A : est-ce que l'interdiction des mono-doses s'appliquera aussi aux plateaux de courtoisie dans les chambres ? dans ce cas, nous allons perdre de nombreux hôtels écolabélisés ;</i> ○ <i>je suggère de rajouter explicitement une exception pour les chambre, sous condition qu'il s'agisse de produits équitables ou bio : qu'en pensez-vous ?</i> 	Accepted Single-dose sugar/coffe inside rooms under the condition that the products used for this purpose is fair trade or organic certificated. (See section3.4.1)
	<p><i>We maintain that the main arguments justifying the use of single-dose packages for non-perishable food (Criterion 16 a) are hygiene / (food) safety and resource savings (less content loss).</i></p>	Partially accepted
	<p><i>The exclusion of single dose packages for these kinds of non-perishable food stuffs is not practicable! Especially tea bags are usually offered and used in all kinds of tourist establishments in single dose packages (one tea bag per cup). Also sugar offered in paper packaging is not a big environmental problem (eg in comparision with bottled water). The (paper) envelopes of tea or sugar etc. are often used to communicate the special product offered (e.g. fair trade tea or sugar).</i></p>	Single-dose sugar/coffee inside rooms under the condition that the products used for this purpose is fair trade or organic certificated and that the used capsules are given back to producers.

	<p><i>Also more and more accommodation are offering in room services (eg. with water boilers in the room) and a ban of these products will exclude all these accommodations from applying for the Ecolabel!</i></p> <p><i>Also instant coffe shall not be excluded but it could be considered to exclude coffee/tee etc. in aluminium capsules!</i></p> <p><i>Criterion 16: in France, it is hard to find tea without envelopes. It would a very difficult criterion to achieve.</i></p> <p><i>Tea loose is not adapted to TAS. The offer of tea bags without plastic or paper envelopes doesn't exist for professional.</i></p> <p><i>a) With the aimshall be used for food services <u>unless for the room service.</u></i></p> <p><i>b) With the tourist accommodation shall follow a documented procedure linked to the action program <u>environmental policy</u> (criterion 1) which specifies how the food waste/packaging waste balance is optimised based on the number of guests. <u>Single dose packages for perishable food stuffs shall be allowed only for periods in which the number of quests doesn't exceed 50% of the maximum occupancy monthly rate.</u></i></p> <p><i>Exempt from this criterion are shops and vending machines under management of the tourist accommodation.</i></p> <p><i><u>Comment: for the room service and other similar services it is not reasonable to exclude the use of single dose packages for non-perishable food stuffs. Furthermore the exemption of vending machines would result in a contradictory message to guests.</u></i></p> <p><i>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. <u>Data on occupancy shall be provided.</u> This will be moreover checked during the on-site visit.</i></p>	<p>(See section3.4.1)</p> <p>With regard to the difficulties for some accommodations to find tea without plastic/paper envelope, an exception has been introduced. (See section3.4.1)</p>
<p>Criterion 17 - Waste prevention: Disposable items</p>	<p><i>Critère 17 Waste prevention: Disposable items</i></p> <ul style="list-style-type: none"> ○ <i>point B : les produits biodégradables ne son plus autorisés ? encore une fois, nous allons perdre des hôtels certifiés</i> 	<p>Biodegradability or compostability, according to EN 13432, is not a guarantee of superior environmental performance. It only guarantees that the material, if discarded in the right waste fraction, collected and adequately</p>

	<p><i>b) Disposable food service items (crockery, cutlery, and water jugs) shall not be available to guests in rooms and restaurant/bar service, unless <u>made of recycled raw materials and biodegradable and compostable according to EN 13432</u> the applicant has an agreement with a recycler for such items.</i></p> <p><i>c) Disposable towels and bedding items shall not be available to guests in rooms unless <u>they are made of recycled raw materials and biodegradable and compostable according to EN 13432</u> the applicant has an agreement with a recycler for such items.</i></p>	<p>managed,. Other durable materials are in fact the real ecological alternative. More information can be found on: A current study commissioned by the German Federal Environment Agency "Analysis of the environmental impact of biodegradable plastic packaging" evaluated a total of 85 life cycle assessments, studies and professional articles with a view to all of the environmental pros and cons of every type of packaging (UBA 2012)⁵⁰. Then under this criterion, the use of biodegradable or compostable materials is allowed, however a proof of its recycling has to be provided through the agreement with the recycling service supplier. If the recycling is not assured, the only ecological option is use of durable materials. (See section3.4.2)</p>
	<p><i>The EEB and BEUC very much welcome the request that disposable food service, towels and bedding items shall not be available to guests in rooms. However, this criterion is watered down by the amendment made to the last draft which exempt the applicant from its application if it "has an agreement with a recycler for such items".</i></p> <p><i>Given that recycling is not waste prevention, in case this amendment is maintained, the title of the criterion should</i></p>	<p>Rejected</p> <p>It is waste prevention as the aim is to restrict the use of disposable items; however as in every criterion there are certain exceptions to recognise current practices. However a proper management</p>

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Cf.

<http://www.umweltbundesamt.de/en/press/pressinformation/bioplastics-not-superior;>
<http://www.umweltbundesamt.de/sites/default/files/medien/461/publikationen/4446.pdf>

study:

	<p><i>be "Disposable items" instead of "Waste prevention".</i></p>	<p>has to be proof in order to allow disposable products. In addition the exception in paragraph c has been deleted. (See section3.4.2)</p>
	<p><i>Criterion 17 c): only 2 certified campsites found alternatives to disposable beddings items and they are expensive. This criterion would be very difficult to implement and there are no recycler in Brittany for these kind of items.</i></p>	<p>Accepted</p> <p>In paragraph c bed items has been replaced by bed sheets and specific exclusion of draw sheets has been introduced, this will allow the use of other bedding items that might be necessary (e.g. draw sheets bed mattresses protectors) for which non disposable items may not be easily available or are needed to comply to with the hygiene hotel policy. In contrast, the exception to use it in case of a recycler agreement has been deleted for towels and bed sheets as for these specific items, the non disposable form are widely available. (See section3.4.2)</p>
	<p><i>Criterion 17 : Waste prevention : Disposable items</i></p> <p><i>Could you just clarify if a group policy (as ADAGIO or Best Western) is considered as an independent quality rating scheme?</i></p> <p><i>It's difficult for campsites to find alternatives to disposable bedding items and they are expensive. This criterion would be very difficult to implement and there are no recyclers in all regions of France for these kind of items.</i></p>	
Criterion 18 - Waste sorting and sending for recycling	<p><i>Are toiletries „hazardous waste“?? better: „...with particular care regarding toiletries and hazardous waste e.g...“</i></p>	<p>Accepted (See section3.4.3)</p>
	<p><u>Criterion 18 - Waste sorting and sending for recycling and re-use of textiles and furniture</u></p> <p><i>a) Without prejudice of the local or national regulation on waste separation, adequate ...each floor and/or <u>in a central point of the tourist accommodation, if applicable.</u></i></p> <p><i>b) Waste shall be separated ...</i></p> <p><i>c) <u>Tourist accommodation shall have a donation procedure in place for all furniture and textiles that reach the end</u></i></p>	<p>Rejected</p> <p>Regarding that this suggestion will suppose an increase of the ambition level and that the revision process is at a late stage it is felt to be risky to introduce the suggested change since there will not be more open consultation to stakeholders on the latest changes.</p>

	<p><i>of their usable life within the tourist accommodation but are still usable by other users. End users shall include charity, employees and/or other associations which collect and redistribute goods.</i></p> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a tourist accommodation plan including waste basket positions an indication of the different categories of waste accepted by the local authorities, and/or relevant contracts with recycling services. This will be moreover checked during the on-site visit. The applicant shall provide a detailed explanation of how the tourist accommodation fulfils sub-criterion c), together with appropriate supporting documentation e.g. written procedure including end user contact details, receipts and records of goods previously donated etc.</i></p> <p><i>Comment: the content of criterion n. 56 has been included in this criterion.</i></p>	
Criterion 19 - No smoking in common areas	<p><i>Where it is not already forbidden by law, nNo smoking shall...</i></p>	<p>Rejected It is not felt necessary to specify this.</p>
Criterion 20 - Promotion of environmental y preferable means of transport	<p><i>Critère 20 : les établissements en pleine campagne doivent être exemptées de ce critère car ils ne sont pas accessibles autrement qu'en voiture et les clients viennent de toutes les régions/pays.</i></p>	<p>Rejected If really there are no other transports available, they are <i>de facto</i> exempted. We do not see the need to exempt them <i>a priori</i>. (See section3.5.2)</p>
Criterion 21 - Information appearing on the EU Ecolabel	<p><i>Could you write a second part of this criterion that would make mandatory to suscribe to ECAT? Other point, could you add on the box "This TAS is actively..... and it's actively controled by a third part company") - that would make difference with greenkéy for exemple</i></p>	<p>Rejected With regard to the ECAT registration, legal services advise it the following: <i>It is not possible to create an obligation through the decision if there is no legal basis for this in the Regulation.</i> With regard to the text box on the logo, the text is harmonized with other product groups and no reference is made to the third party verification in the other</p>

		product groups in addition this harmonised text is based on the EU Ecolabel Regulation, Annex II.
Criterion 22 - EMAS registration, ISO certification of the tourist accommodation (up to 5 points)	<i>Here I would add „certified according to ISO 50001 (2 points)“ it is Energy management system certification scheme</i>	Rejected EMAS BEMP report proposes environmental management plan. There are already several criteria on energy then it is seen as a value to have a more broad management plan on the optional criterion. With regard to the major environmental benefits associated to the EMAS compared to ISO 14001 see criterion rationale. Title and points allocation are considered appropriate as currently proposed. (See section3.6.1)
	<i>EMAS and ISO 14.000 should be equal throughout the criteria document, and a max point of 4 point in each criteria 22 and 23.</i>	
	Criterion 22 – Certified environmental management system EMAS registration, ISO certification of the tourist accommodation (up to 5 points) The tourist accommodation shall be registered under the Community eco-management and audit scheme (EMAS) (5 points) or certified according to ISO 14001 standard (3 2 points).	
Criterion 23 - EMAS registration or ISO certification of suppliers (up to 5 points)	<i>Here I would add „certified according to ISO 50001 (2 points)“ it is Energy management system certification scheme</i>	Rejected EMAS BEMP report proposes environmental management plan. There are already several criteria on energy then it is seen as a value to have a more broad management plan on the optional criterion. With regard to the major environmental benefits associated to the EMAS compared to ISO 14001 see criterion rationale. Title and points allocation are considered appropriate as currently proposed. (See section3.6.2)
	<i>EMAS and ISO 14.000 should be equal throughout the criteria document, and a max point of 4 point in each criteria 22 and 23.</i>	
	<i>why having 5 pts for EMAS and 3 for ISO on criterion 22 and here 5 for EMAS and 2 for ISO ?)</i>	
Criterion 23 - EMAS registration or ISO certification Certified environmental management system of suppliers (up to 5 points) At least two <u>one</u> of the main suppliers or service providers of the tourist accommodation shall be registered with EMAS (5 points) or <u>at least two of the suppliers or service providers of the tourist accommodation shall be certified according to ISO 14001 (2 points).</u>		

	<p><i>Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification by at least two of his main suppliers.</i></p>	
<p>Criterion 24 - Ecolabelled services (up to 4 points)</p>	<p><i>What do you mean by "outsourced cleaning" ??? what is this ? is it related to cleaning-people like housekeepers ? I don't understand... there is no european decision related to that...</i></p> <p><i>What about when we do our own cleaning and laundry ? Can we earn points ?</i></p> <p><i>=> What about mandatory criteria for subcontractors ? This point is an important environmental impact...</i></p> <p><i>In fact in the tourism sector, we don't have EE criteria for leisure services and having points for subcontractors was a great opportunity to build strong links with partners... and to improve the global environmental efficiency... regarding that those subcontractors are located on the same territory !</i></p> <p><i>Criterion 23 : Ecolabelled services (up to 4 points)</i></p> <p><i>We don't have any laundry and/or cleaning suppliers with ISO type I certification in France.</i></p>	<p>Rejected</p> <p>The current criterion on subcontractors has low impact due to the fact that the set of mandatory criteria is addressed to tourist accommodation services and therefore difficult to be applicable to other type of subcontracted services. Then the criterion would result in small environmental benefit. In addition there is already criterion on EMAS/ISO registration of suppliers.</p> <p>The new proposed criterion is clearer and better defined and in line with EMAS BEMP report benchmarks.</p> <p>However recognising that these type of services might not be available everywhere it suggested to be kept optional. (See section3.6.3)</p>
	<p><i>A CB suggested to score only 2 points under this criterion.</i></p>	
<p>Criterion 25 - Environmental and social communication and education (up to 3 points)</p>	<p><i><u>Criterion 25.</u> In criteria where there are more than one option and/or is being used. This is confusing we suggest to delete these, not only in this criterion but in all. Simply listing a, b and c is more clear when the maximum point is mentioned in the headline.</i></p>	<p>Accepted (See section3.6.4)</p>
	<p><i>Criterion 25 should be mandatory, or it should remain the same at least.</i></p>	
	<p><i>The tourist accommodation shall provide environmental communication and education notices on local biodiversity, landscape and nature conservation measures to guests <u>and when applicable guest entertainment includes elements of environmental education (e.g. books, animations, events)</u> (1 point)</i></p>	

	<p>and/or b) The tourist accommodation shall provide information to guests on local touristic points of interest, local guides, local restaurants, markets, craft centres to guests (1 point) and/or c) Guest entertainment includes elements of environmental education (e.g. books, animations, events) (1 point) Comment: point b) refers to activities that tourist accommodations would fulfill in any case. Point c) refers to activities that are almost impossible to assess.</p>	mandatory criterion on information to guest (See section 3.1.3) as it is not a big burden and has a potential impact on local environment. Rest of the criterion is kept in mandatory and is practically same text than the current in force. (See section3.6.4)
Criterion 26 – Consumption monitoring: Energy and water sub-metering (up to 2 points)	Assessment and verification: <u>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) a map showing the places where meters are placed.</u>	Accepted (See section 3.6.5)
Criterion 27 - Energy efficient space heating and water heating appliances (up to 3 points)	<p>I don't understand how you can get optional point to respect a mandatory criterion (cf. point A or C)</p>	The optional criterion is therefore aimed at awarding points to those tourism accommodations that have an efficient heating appliance installed at the moment of the application, while the mandatory would apply to the new appliance installed during the period of validity of the license. The objective of this proposal is to encourage the replacement of old appliances, since their lifetime might span 30 years and therefore the mandatory criterion might never be applied. (See section3.7.1)
	<i>The tourist accommodation shall have at least:</i>	Partially accepted (See section3.7.1)

	<p>a) A <u>The water-based space heating appliances/system</u> meeting criterion 6 (a) (1 point)</p> <p>and/or</p> <p>b) <u>All the local space heating appliances</u> having at least the energy class A as defined in Commission Delegated Regulation (EU) 2015/1186 of 24 of April 2015 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of local space heaters (14) (1 point)</p> <p>and/or</p> <p>c) A <u>The water heating appliances/system</u> meeting criterion 6 (c) (1 point)</p> <p><u>Comment: the changes above are aimed at clarifying which and how many system/systems/appliances have to meet the requirements of criterion 6.</u></p> <p><u>Assessment and verification: The applicant shall provide technical specifications from the manufacturer or and the professional technicians responsible for installation, sale and/or maintenance of the space and water heaters appliances indicating how the required efficiency in ±6 a), and/or ±6 b) and/or ±6 c) is met. EU Ecolabel water-based heaters products will be deemed to comply with requirement ±6 a).ii. Other ISO type I label products having the requirements mentioned in ±6 a), and/or ±6 b) and/or ±6 c) will be deemed to comply. Where EU Ecolabel water-based heaters products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2014/314/EU(3). Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate <u>and indicate the ISO type I label requirements that are like the ones mentioned above.</u></u></p>	
<p>Criterion 28 - Energy efficient air conditioning and air-based heat pumps appliances (up to 3.5 points)</p>	<p>Criterion 28 - Energy efficient <u>household</u> air conditioning and air-based heat pumps appliances (up to 3.5 points)</p> <p>The tourist accommodation shall have at least:</p> <p>a) 50% of household air conditioners or air-based heat pumps in the tourist accommodation (rounded to the next integer) have energy efficiency 15% higher than the threshold set in criterion 7 (1.5 point)</p> <p>And/or</p>	<p>Rejected</p> <p>Title and points allocation are considered appropriate as currently proposed.</p>

	<p>b) 50% of household air conditioners or air-based heat pumps in the tourist accommodation (rounded to the next integer) have energy efficiency 30% higher than the threshold set in criterion 7 (23 points)</p> <p><i>Assessment and verification: The applicant shall provide technical specifications from the manufacturer or and the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system indicating how the required efficiency is met.</i></p>	
<p>Criterion 29 – Air-based heat pumps up to 100 kW heat output (3 points)</p>	<p><i>The tourist accommodation shall have at least an air-based heat pump meeting criterion 7 (if applicable, see note in criterion 7) and awarded with the EU Ecolabel in accordance with Commission Decision 2007/742/EU of 9 November 2007 establishing the ecological criteria for the award of the Community eco-label to electrically driven, gas driven or gas absorption heat pumps (15) or other ISO Type I label.</i></p> <p><i>Here I would put „or“, instead of „and“.</i></p> <p><i>Criterion 29. Heat pump. Optional points. Three points for a 2007 criteria based heat pump seems high. Insert at least a criterion demanding a higher energy efficient heat pump.</i></p>	<p>It is also necessary to harmonize the energy efficiency criterion to the current Energy labelling on air conditioners (Commission Delegated Regulation (EU) No 626/2011), whose scope overlaps EU Rejected Ecolabel's in the air to air heat pumps up to 12 kW electrically driven. This would avoid the use of outdated energy classes and any loophole within the energy efficiency criteria set of the TAS product group. Regarding the heat pumps > 12 kW, the energy efficiencies of the EU Ecolabel Decision would apply, since it is not feasible to revise those thresholds within the revision process of Tourism accommodation criteria. Title and points allocation are considered appropriate as currently proposed. (See section3.7.3)</p>
	<p>Criterion 29 – Air-based household heat pumps up to 100 kW heat output (up to 3 5 points)</p> <p>The tourist accommodation shall have at least</p> <p>a) an air-based heat pump meeting criterion 7 (if applicable, see note in criterion 7) and awarded with the EU Ecolabel in accordance with Commission Decision 2007/742/EU of 9 November 2007 establishing the ecological criteria for the award of the Community eco-label to electrically driven, gas driven or gas absorption heat pumps (15) or other ISO Type I label (2 points).</p> <p><u>And/or</u></p> <p>b) <u>a household air-based heat pumps awarded with the EU Ecolabel in accordance with Commission Decision 2007/742/EU of 9 November 2007 establishing the ecological criteria for the award of the Community eco-label to electrically driven, gas driven or gas absorption heat pumps (3 points) or other ISO Type I label (1 points).</u></p> <p><i>Assessment and verification: The applicant shall provide technical specifications from the manufacturer or and the professional technicians responsible for installation, sale and/or maintenance of the air conditioning system indicating how the required efficiency is met (if applicable).</i></p>	
<p>Criterion 30 –</p>	<p><i>WHAT ABOUT LIGHTBULBS ????????? I asked you for 3 times... the impact of lightbulbs is HUGE and MANY MORE</i></p>	<p>Accepted</p>

Energy efficient household appliances (up to 4 points)	<p><i>IMPORTANT THAN THE VACCUM you added (sorry for caps... but the investment on A+ or A++ bulbs can be huge with a critical environmental impact... so I'm sure we <u>must</u> allow points for TAS who has 50% or 90% of A+ or A++ bulbs !!!!</i></p>	<p>Requirement on most efficient lighting has been added to allow a further improvement to the mandatory criteria. The title has been modified accordingly. (See section 3.7.4)</p>
Criterion 31 - Heat recovery (up to 3 points)	<p>tourist accommodation shall have a heat recovery system (for one (1.5 point) or two (3 points) of the following categories: heating/cooling systems, refrigeration systems, ventilators, washing machines, dishwashers, swimming pool(s), and sanitary waste water) <u>that recovers at least 30% of energy used.</u> <i>Comment: to be credible and effective the criterion has to define a quantitative threshold for heat recovery.</i></p>	<p>Rejected There is no BEMP on this. No threshold can be set without evidence on the best practices on % of recovered energy.</p>
Criterion 32 - Thermoregulation (up to 3 points)	<p><i>The temperature in every common area (for example restaurants, lounge areas, and conference rooms) shall be individually regulated within the following designated range (1 point): Here I would add "+/- 2°C, on customers' request".</i> <i>The temperature in every guest rooms shall be regulated by guests in order to meet their needs. The temperature shall allow individual regulation within the following designated range (2 points): Here I would add "+/- 2°C". I must say that 22°C is too cold for most customers</i></p> <p><i>Criterion 32. Replace option with regards to thermoregulation in common area to be <u>mandatory</u>. "Release" the point to thermoregulation in rooms.</i></p> <p><i>Spa areas shall be excluded!(on common areas)</i></p> <p><i>I think 22°C in the south west of Spain (Sevilla) is not reasonable in summer... it's too low !!!!!</i></p> <p><i>Anoter CB suggested following wording for mandatory section:</i></p> <p><u>Criterion 7bis - Thermoregulation</u></p> <p><i><u>Systems which automatically regulate temperature in rooms and in every common area shall be installed in new or renovated tourist accommodations within the duration of the EU Ecolabel licence.</u></i></p> <p><i><u>The temperature in every common area (for example restaurants, lounge areas, and conference rooms) shall be automatically regulated within the following designated range:</u></i> <i><u>i. common area temperature set point, while in cooling mode, is set at or above 22°C for the duration of the</u></i></p>	<p>Partially accepted In TR4.0, the criterion has been split in two parts. The requirements addressing temperature control in common areas has been transferred to mandatory criteria. However in order to recognise its obligatory character and that several stakeholders consider 22 degrees to be strict, "+/- 2°C, on customers' request" has been added for the mandatory criteria. The requirement for guest rooms temperature control remains as optional and the points allocated for this part have been increased in order to recognise the difficulties to meet this criterion. (See section 3.2.4 and 3.7.6)</p>

	<p><u>summer.</u> <u>ii. common area temperature set point, while in heating mode, is set at or below 22°C for the duration of the winter.</u></p> <p><u>The thermoregulation system in every guest rooms shall allow regulation by guests in order to meet their needs. The thermoregulation system shall allow individual regulation within the following designated range:</u> <u>i. Room temperature set point, while in cooling mode, is set at or above 22°C for the duration of the summer.</u> <u>ii. Room temperature set point, while in heating mode, is set at or below 22°C for the duration of the winter.</u></p> <p><u>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with all relevant documentation on the thermoregulatory systems.</u></p> <p>And to maintain in optional section</p> <p><u>Heating/air conditioning systems shall be equipped with an automatic management and monitoring system.</u></p> <p>The temperature in every common area (for example restaurants, lounge areas, and conference rooms) shall be individually <u>automatically</u> regulated....</p>	
<p>Criterion 33 - Automatic switch off appliances/devices (up to 4.5)</p>	<p>(a) For better understanding please add: ...an automatic switch off "of installed HAVC systems" when windows are opened...</p> <p>a) 90% of the guest rooms in the tourist accommodation (rounded to the next integer) shall be equipped with an automatic switch off <u>of heating/cooling appliances</u> when windows are opened and when guests leave the room (1.5 points)</p> <p>b) 90% of the guest rooms in the tourist accommodation (rounded to the next integer) shall be equipped with an automatic system which turns the lights off when guests leave the room (1.5 points)</p> <p>c) 90% of the outside lighting (rounded to the next integer) not needed for security/<u>advertising</u> reasons shall be turned off automatically after a defined time, or be activated through a proximity sensor (1.5 points)</p>	<p>Partially accepted (See section 3.7.7)</p>
<p>Criterion 34 - District heating/cooling</p>	<p><i>is there a lot of licence holder who fill this criterion? maybe it could be removed?</i></p> <p>Criterion 34 - District heating/cooling and Cooling from cogeneration (up to 4 points)</p>	<p>Rejected This type of heating and cooling systems is highly efficient and it is worthwhile to</p>

<p>and cooling from cogeneration (up to 4 points)</p>	<p>a) The heating and/or cooling of the tourist accommodation shall be provided by efficient district heating or cooling system. For the purposes of the EU Ecolabel this is defined as follows: a district heating or cooling system using at least 50 % renewable energy, 50 % waste heat, 75 % cogenerated heat or 50 % of a combination of such energy and heat, as defined by Directive 2012/27/EU(2) (2 points)</p> <p>And/or</p> <p>b) Cooling of the tourist accommodation shall be provided by a high efficiency cogeneration unit according to Directive 2012/27/EU (2) (2 points).</p> <p><i>Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with <u>technical specifications from the professional technicians responsible for the design of the system and for the installation and/or maintenance of the cogeneration unit</u> documentation on the district heating system and/or the cooling system by means of cogeneration.</i></p> <p><i><u>Comment: district heating systems serve many local users (families, other commercial activities, etc.) not only the applicant who can't be given the credit of the district heating system realization.</u></i></p>	<p>promote their use. (See section 3.7.8)</p>
<p>Criterion 35 - Electric hand driers with proximity sensor (1 point)</p>	<p>Criterion 35 - Electric hand driers and hair driers with proximity sensor (1 point)</p> <p>All electric hand driers shall be fitted with proximity sensors, and all electric hair driers shall be fitted with "push button" or have been awarded an ISO Type I eco-label.</p> <p><i>Assessment and verification: The applicant shall provide appropriate supporting documentation of how the tourist accommodation fulfils this criterion. Where ISO type I label products are used, applicant shall provide a copy of the type I label certificate <u>and indicate the ISO type I label requirements that are like the ones mentioned above.</u></i></p>	<p>Rejected</p> <p>Stakeholder feedback suggests that hairdryers are commonly fitted with 'push buttons'. A requirement on hairdryers will be very easy to achieve.</p>
<p>Criterion 36 - Space Heater NOx emissions (1.5 points)</p>	<p>Without prejudice of the local or national regulation on exhaust gas emissions for all space heaters in the tourist accommodation the nitrogen oxide</p> <p><i>Where other ISO type I label products are used, applicant shall provide a copy of the type I label certificate <u>and</u></i></p>	<p>Partially accepted</p> <p>This is an optional criterion. We do not see the need to introduce without prejudice of the local or national</p>

	<p><u>indicate the ISO type I label requirements that are like the ones mentioned above.</u></p>	<p>regulation... as there is no obligation on fulfilling this criterion. The applicant is requested to indicate the ISO type I label requirements that that are like the ones mentioned in the criteria to facilitate verification when other type of labels are used. (See section 3.7.10)</p>
<p>Criterion 37 - Procurement of electricity from a renewable electricity supplier (4 points)</p>	<p><u>a) Current proposal: The tourist accommodation shall contract an individual electricity tariff containing at 100% of the electricity from renewable energy sources as defined in Directive 2009/28/EC (11) and third party certified by an environmental electricity label.</u></p> <p><i>BEUC and the EEB share concerns that this proposal allows for ambiguity with regard to the tariff product's fuel mix and the supplier's fuel mix and would like to refer to paragraph (1) of the proposal presented in Annex I to improve the requirement.</i></p> <p><i>In addition, the requirement may be difficult to implement in all Member States thus making it impossible for the applicant to engage in this option. Private quality labels do not exist in all 'green electricity' markets. Moreover, some Member States have made private quality labels superfluous because of ambitious national regulation.</i></p> <p><i>As alternative wording we suggest "...and, if no national regulation on environmental benefits of such tariffs exists, and if an independent environmental quality label for 100% renewable electricity tariffs is available in the country, the tariff preferably should be certified by such a label to substantiate its additional environmental benefit.</i></p> <p><u>b) Current draft proposal: Alternatively the 100% renewable energy, third party certified by an environmental electricity label, can also be acquired by the separate purchase of Guarantees of Origin, as defined in the Directive 2009/28/EC (12)"</u></p> <p><i>Following the same rationale as for criterion 11, unbundled purchase of Guarantees of Origin should not be proposed as an alternative but be only allowed exceptionally for countries without access to 'green electricity' tariffs.</i></p>	<p>Partially accepted</p> <p>The criteria text has been further defined by specifying that the quality label's standard is verified by an independent organization (third party) to ensure transparency and reliability and by including as a minimum the condition that the certified electricity originates from new renewable plant capacity installed within the past two years or promotes the investment in new renewable power capacities. In addition a link to the ecolabelindex is suggested to be introduced in the user manual as a guide to applicants and CBs for complying with this criterion. Ecolabelindex website offers updated information on the available labels, the type of verification and the web links of such labels.</p> <p>With regard to the request on giving prioritisation to green tariffs, the wording has been kept flexible recognising the</p>

	<p>General remarks on the role of ‘green electricity’ quality labels</p> <p><i>Although, the intention to improve the ambition of both part a) and part b) of criterion 37, through the addition of third party certified environmental labels is acknowledged, there are different aspects that compromise the applicability and implementation of this requirement:</i></p> <ul style="list-style-type: none"> - <i>In some countries, like the UK or Denmark, instead of promoting the use of these labels, the national energy market regulators have implemented advanced rules on ‘green electricity’ tariffs with embedded quality requirements.</i> - <i>It is not clear what is meant with ‘third party certified by an environmental electricity label’. There is currently a broad range of third party certified environmental electricity labels in the EU. To ensure transparency and strictness of this criterion, there is a need for further analysis and setting of specific requirements that can enable the comparison between labels and the elaboration of a reference list of those labels that could be used in the EU Ecolabel.</i> - <i>If environmental quality labels will be recommended by the EU Ecolabel, it should be assessed under which conditions such labels are regarded transparent and trustworthy in respect to additional environmental benefits. In a project run within the Federation of German Consumer Organisations VZBV, some ‘green electricity’ quality labels were identified that were neither sufficiently independent nor did they clearly substantiate an environmental benefit.⁵¹</i> - <i>Given the huge divergence with regard to the advancement of national ‘green electricity’ markets in different Member States, it will generally be challenging to compare different national labels.</i> - <i>Third party environmental labels, so-called quality labels, apply to ‘green’ tariffs offered by suppliers to retail market customers. In our understanding, the objective of an independent quality label is that the certified supplier substantiates the environmental benefit generated by a consumers’ choice for the ‘green’ tariff. This is how trustworthy environmental quality labels, partly established by environmental NGOs and consumer organisations, actually work in some of the Member States. In case a hotel buys GOs unbundled from a trader, there is nobody to be monitored for generating an environmental benefit. The money spent</i> 	<p>different options, however conditions for the unbundle purchase has been introduced aligned to mandatory criterion and points have been allocated to recognise the different performance levels. Maximum of points are awarded only if green tariff with independent ecolabel is chosen among the available options. (Sees section 3.7.11)</p>
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⁵¹ VZ Niedersachsen: Überblick: Die wichtigsten Ökostrom-Labels, <https://www.marktwaechter-energie.de/untersuchungen/ueberblick-oekostrom-labels/>, 12 January 2016.

<p><i>on the GO goes to the renewable power plant operator who owned the GO and to the trader.</i></p>	
<p>A stakeholder asked to reintroduce an updated version of the table published in Technical report 2.0 on electricity ecolabels available in Europe.</p> <ul style="list-style-type: none"> - The Italian label doesn't exist any more. (100%energia verde). This can be deleted. - EKOenergy is new on the market, and works in all European countries. www.ekoenergy.org (you can download the logo from: http://www.ekoenergy.org/extras/logo/, e.g. this one: http://www.ekoenergy.org/wp-content/uploads/2013/08/ekoenergy_logo_English.jpg) - Bra Miljöval means: Good Environmental Choice, (Not "Good green buy"). The website is: http://www.naturskyddsforeningen.se/bra-miljoval/el - I don't know what happened to the name of 'Grüner Strom' in your list, but it looks very strange: "TTUheV G Srüunde)r Strom Label e.V.". The right name is "Grüner Strom Label", as you can see on their website. http://www.gruenerstromlabel.de/ - The name of 'Naturemade' is missing in your list. You have just added the link to their website. - The order of the labels is strange. I don't see any logic. Would you not order them alphabetically? - I don't think it is necessary to use an article in front of the name. (Thus without 'the'). E.g. Milieukeur. Not "The Milieukeur label" - Tüv-Süd and Tüv-Nord are 2 completely different things. They just happen to have a similar name. You should put them in different rows. - For Tüv-Süd: It is not necessary to write the name in full. The name is just 'Tüv-Süd' (name of the certifier). The labels are called Tüv-Süd EE01 and Tüv-Süd EE02 <p>See http://www.tuev-sued.de/plants-buildings-technical-facilities/fields-of-engineering/environmental-</p>	<p>Partially accepted</p> <p>A general link to ecolabelindex is introduced. (Sees section 3.7.11)</p>

	<p>engineering/energy-certification/ecopower-certification</p> <p>- I would not list Tüv-Nord (in other words, I would delete them). As far as I know, they don't have their own independent list of criteria. They just check if the claims of the seller are true. This claim can be anything. / There is another company doing similar things: Tüv Rheinland</p> <p>- We somehow have to add a reference to say that there may be other national ecolabels. Just to avoid that we missed one (E.g. at the time you made the former list, there was also a label in the UK, but that has stopped its activities in 2015)</p> <p>- I think you are on 'safe ground' with this list, as it is more or less the same as those listed in the ecolabelindex. See: http://www.ecolabelindex.com/ecolabels/?search=electricity&as_values_061=</p>	
	<p>Great idea to have a lot of points here. In addition to what I told on criterion 11... it's important to promote green energy and giving 4 pts here is really a great way to do so !</p>	
<p>Criterion 38 - On site self-generation of electricity through renewable energy sources (up to 5 points)</p>	<p>Great idea to have a lot of points here.</p> <p>The tourist accommodation shall have on site electricity generation from renewable energy sources as defined in Directive 2009/28/EC (11), which may include: photovoltaic (solar panel) or local hydroelectric system, geothermal, biomass or wind power electricity generation, that generates:</p> <p>a) At least ±20% of the overall electricity consumption per year (±2 points). Or b) At least 230% of the overall electricity consumption per year (3 points). Or c) At least 50% of the overall electricity consumption per year (5 points).</p> <p><u>Biomasses or biogas used as renewable energy sources shall be produced no further than 70 km from the power plant in which they are used (short supply chain).</u></p>	<p>Rejected</p> <p>Stakeholders 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.</p> <p>With regard to source distance. We do not see the need on specifying a distance as the short supply chain is assured as the criterion applies to on-site generation.</p>
<p>Criterion 39 -</p>	<p>Critère 39 : la question a été posée lors du dernier Colloque Ecolabel à Bordeaux de savoir si le bois était enfin</p>	<p>According to Directive 2009/28/EC ⁽¹³⁾,</p>

<p>Heating energy from renewable energy sources (up to 2 points)</p>	<p><i>considéré comme énergie renouvelable ; la réponse était positive alors qu'il est indiqué dans ce critère que ce n'est pas le cas.... (uniquement panneaux solaires, éoliennes, etc... quand on sait que la construction des ces matériels peuvent être extrêmement polluants, cela paraît injuste d'écartier le bois comme source d'énergie renouvelable (le CO2 produit lors de la combustion l'aurait été de toutes façons lors de la dégradation des arbres))/ Criterion 39: the question was raised at the last symposium in Bordeaux Ecolabel whether the wood was finally considered renewable energy; the answer was then noted in this test that is not the case (Only solar panels, wind turbines, etc ... given that the construction of these materials can be highly polluting, it seems unjust to exclude wood as a renewable energy source (the CO2 produced during combustion would have been of anyway during the degradation of the trees))</i></p>	<p>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. (See section3.7.13)</p>
	<p>Maybe you can split a little bit more the points :</p> <p>a- At least 70% of the total energy used to heat or cool the rooms (0.75pt) or to heat sanitary water (0.75pt)</p> <p>or</p> <p>b- 100% of the total energy used to heat or cool the rooms (1pt) or to heat sanitary water (1pt)</p>	<p>Rejected One of the purposes of this revision is to increase the level of ambition of current criteria. (See section3.7.13)</p>
	<p>Criterion 39 – On site self-generation of heating/cooling energy from renewable energy sources (up to 25 points)</p> <p><u><i>This criterion doesn't apply to heating/cooling systems supplied by electricity.</i></u></p> <p>a) At least 7050% of the total energy used to heat or <u>and</u> cool either the rooms or <u>and</u> to heat sanitary water shall come from renewable energy sources as defined in Directive 2009/28/EC(11) (12.5 2.5 points)</p> <p>Or</p> <p>b) 100% of the total energy used to heat or <u>and</u> cool either the rooms or to heat sanitary water shall come from renewable energy sources as defined in Directive 2009/28/EC(11) (25 5 points)</p> <p><u><i>Comment: the only possibility to produce thermal energy from renewable energy sources is through on site generation (excluding thermal generation by electricity from renewable energy sources as well as district heating and cooling). Energy required to heat sanitary water is likely to be much less than that required to heat or cool the rooms. Therefore it wouldn't make sense to refer the percentage threshold indifferently to one or to other. Applying the percentage threshold to the total amount of energy required by the tourist accommodation leads to an increase</i></u></p>	<p>Partially accepted (See section3.7.13)</p>

	<p><u>of the points that can be awarded.</u></p> <p><i>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 7050% or 100% of this energy comes from renewable energy sources.</i></p>	
<p>Criterion 40 - Swimming pool heating (up to 1.5 points)</p>	<p>b) At least 95% of the total energy used to heat swimming pool water shall come from renewable energy sources as defined in Directive 2009/28/EC(11) (1.5 point) Here I would add: „Or tourist accommodation do not heat swimming pool water, i.e. pool water is heated naturally by sun“ since the environmental impact is even better.</p>	<p>Rejected Geographically dependent. In those cold places where swimming pool need to be warm to meet clients expectations it will be awarded the use of RES. (See section3.7.14)</p>
	<p>Criterion 40 - <u>On site self-generation of swimming pool heating (up to 1.52points)</u></p> <p><u>This criterion doesn't apply to heating systems supplied by electricity.</u></p> <p>a) At least 50% of the total energy used to heat swimming pool water shall come from renewable energy sources as defined in Directive 2009/28/EC(11) (1 point) Or b) At least 95% of the total energy used to heat swimming pool water shall come from renewable energy sources as defined in Directive 2009/28/EC(11) (1.52 point) <u>Comment: the only possibility to produce thermal energy from renewable energy sources is through on site generation (excluding thermal generation by electricity from renewable energy sources as well as district heating/cooling).</u></p>	<p>Rejected This criterion promotes the use of renewable energies. The criterion in not limited to on site as there might be also renewable energy sources coming from district heating with biomass for instance.</p>
<p>Criterion 41 - Efficient water fittings: Bathroom taps</p>	<p>6l/min is very low, better keep with former limits. see comment on mandatory criterion</p>	<p>Partially accepted The requirement has been revised to fully align to the EMAS BEMP report benchmarks. (See section3.8.1)</p>

<p>and showers (up to 4 points)</p>	<p>a) The average water flow rate of the bathroom taps and showers shall not exceed 6 litres/minute. (2 points) And/or</p> <p>b) At least 50% of the bathroom taps and shower (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Commission Decision 2013/250/EU (12) or another ISO type I label (23 points)</p> <p>c) <u>At least 50% of the bathroom taps and shower (rounded to the next integer) shall have been awarded another ISO type I label (1 points)</u></p> <p><i>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. Measurement of the water flow has to be done (e.g. use by means of flowmeter or small bucket and a watch). EU Ecolabel sanitary tapware products and/or other ISO type I label products having the above mentioned requirements will be deemed to comply. Where EU Ecolabel sanitary tapware products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2013/250/EU (12). Where other type I label products are used, applicant shall provide a copy of the ISO type I label certificate.</i></p>	<p>Rejected</p> <p>During the revision process a majority of stakeholders highlighted that the purpose of ecolabelling is to support sustainable consumption as such and not a tool to promote other EU ecolabel products.. Therefore they were in favour to not limit the possibilities only to products with EU Ecolabel.</p> <p>Against this since TR3.0 for all criteria where EU Ecolabel is requested or is considered to be a means of proof, the alternative to use other ISO Type I labels has been included.</p>
<p>Criterion 42 - Efficient water fittings: Toilets and urinals (up to 4.5 points)</p>	<p><i>Problème d'ordre général par rapport aux nouveaux critères : il faut apporter des preuves concernant de nouveaux produits ou installations ; lorsque la rénovation n'est pas très ancienne, certains matériels peuvent rentrer dans les critères demandés mais les preuves (doc techniques, ou autres...) n'ont pas forcément été conservées en l'absence de nécessité : exemple des toilettes ecolabel dans le critère 42/ General problem in relation to the new criteria: it must provide evidence about new products or facilities; when the renovation is not very old, some materials can enter the required criteria but the evidence (technical doc, or other ...) have not necessarily been preserved in the absence of necessity example of ecolabel criteria in the toilet 42</i></p>	<p>Documentary and technical evidence is needed to show compliance. (See section3.8.2)</p>
	<p>a) At least 50% of urinals (rounded to the next integer) shall use a waterless system. (1.5 point) And/or</p> <p>b) At least 50% of urinals (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Commission Decision 2013/641/EU (13) or another ISO type I label. (1.52 point) And/or</p>	<p>Rejected</p> <p>During the revision process a majority of stakeholders highlighted that the purpose of ecolabelling is to support sustainable consumption as such and not a tool to promote other EU ecolabel products..</p>

	<p><i>c) At least 50% of toilets (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Commission Decision 2013/641/EU (13) or another ISO type I label. (1.52 point)</i> <i>And/or</i> <i>d) At least 50% of urinals (rounded to the next integer) shall have been awarded another ISO type I label. (1 point)</i> <i>And/or</i> <i>e) At least 50% of toilets (rounded to the next integer) shall have been awarded another ISO type I label. (1 point)</i></p> <p><i>Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation. EU Ecolabel flushing toilets and urinals products and/or other ISO type I label having the above mentioned requirements will be deemed to comply. Where EU Ecolabel flushing toilets and urinals products are used, the applicant shall provide a copy of the EU Ecolabel certificate showing that it was awarded in accordance with the Commission Decision 2013/641/EU (13). Where other ISO type I labels are used, applicant shall provide a copy of the type I label certificate.</i></p>	<p>Therefore they were in favour to not limit the possibilities only to products with EU Ecolabel. Against this since TR3.0 for all criteria where EU Ecolabel is requested or is considered to be a means of proof, the alternative to use other ISO Type I labels has been included.</p>
<p>Criterion 43 - Dishwasher water consumption (2.5 points)</p>	<p><i>Could we imagine having a criterion referring to an "average"... I have around 150 dishwashers at blue Ocean... I know that the majority are below the proposal... but some are higher... Like we did for the taps... the average would be a good point...</i></p>	<p>Rejected</p> <p>The thresholds are fully aligned to the benchmarks identified at the time Commission Regulation with regard to ecodesign requirements for household appliances. (See section 3.8.3)</p>
<p>Criterion 44 - Washing machine water consumption (3 points)</p>	<p><i>Critère 44 : le lave-linge de 15kg n'apparaît pas dans la liste (or, s'il est A+++ , il est pourtant plus économique en énergie puisqu'il tourne moins souvent) / Criterion 44: the washing machine 15 kg does not appear in the list (or, if A+++ , yet it is more energy efficient because it runs less often)</i></p> <p><i>What is a "commercial" whasing machine... I actualy have a 22kg washing machine here... is it a "commercial machine" to your eyes ? if yes => OK</i></p>	<p>Rejected</p> <p>The thresholds are fully aligned to the benchmarks identified at the time Commission Regulation (EU) No 1015/2010 with regard to ecodesign</p>

	<p><i>Same as 43... can you refer to an "average" ?</i></p>	<p>requirements for household appliances and to the EMAS BEMP report benchmark for commercial appliances. (See section3.8.4)</p> <p>Compared to household washing, the main aspect considered in the design of professional appliances is to provide satisfactory levels of performance quickly and continuously to meet exigencies of commercial users. Professional appliances have to comply with the machinery directive: they either need higher voltage or different safety requirements. According to the Machinery Directive, manufacturers have to determine the 'intended use' (domestic or commercial / industrial use) and state this in the <u>product information or the so called Declaration of Conformity</u>. "Household appliances intended for domestic use", on the other hand, must fulfil the safety objectives of the Low Voltage Directive 2006/95/EC. The technical data could be then used by applicants and Competent Bodies to identify the type of appliance and the</p>
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		requirement that applies.
Criterion 46 Optimised pool management (up to 3 points)	<i>add also outside whirlpools</i>	Accepted It is suggested to extend the scope of this criterion to outside whirlpools. In addition, this is in line with EMAS BEMP report which addresses pools in general. (See section3.8.6)
	<i>b) Swimming pools shall have an automatic system which optimises chlorine consumption through optimised dosing or use of supplementary disinfection methods such as e. g. ozonation and UV treatment or sodium chloride based treatments (0.5 point)</i>	Rejected Current wording is aligned to the EMAS Sectoral Reference Document.
Criterion 47 - Rainwater and grey water recycling (up to 3 points)	Here I would add “recycled water from waste water treatment facility (2 points)”	Rejected The criterion is aligned to <i>Trpadvisor greenleadres</i> . In addition, recycled water is already addressed in paragraph a. Reclaimed water. See following definition (to be included in user manual): <i>Reclaimed water, also known as grey water, is recycled waste water generated from laundry, showers, and lavatory sinks that is treated and reused...</i> (See section3.8.7)
Criterion 49 - Indigenous species used in outdoor planting (1	<i>BEUC and the EEB accept the definition proposed by the JRC. However, we recommend the JRC to make the following changes:</i> <ul style="list-style-type: none"> - <i>Replace “all existing planting by “all existing plants”</i> - <i>Introduce the concept of future plantings and include the notion of indigenous plants</i> 	Accepted Minor modifications have been introduced in the criteria text to address future plantings and environmental benefits associated to native plants. Terminology

<p>point)</p>	<p><i>In case the verification is done by an expert, an additional point could be attributed if the plants are 'real' indigenous species and not just 'adapted species'. Within the framework of an environmental label it is relevant to take account of visual impressions and environmental education of costumers.</i></p> <p><i>EU has a policy on invasive alien species (IAS): http://ec.europa.eu/environment/nature/invasivealien/index_en.htm</i></p> <p><i>We would propose to replace the word "indigenous species" by "native species". Non-indigenous is correct, but better to use the same vocabulary as we usually do.</i></p> <p><i>We would propose to replace the word "adapted species" by "non-invasive alien species". Alien species are commonly planted in gardens, and only some of them have the potential to become invasive and threaten biodiversity.</i></p> <p><i>We would propose to include the absence of IAS of Union concern as an additional bonus.</i></p> <p><i>Under the IAS-policy, the worst IAS are listed as IAS of Union concern. Those species are banned from the EU. The first list is expected to be adopted soon.</i></p> <p><i>The list includes terrestrial plants, like Eastern baccharis and Persian hogweed, and aquatic plants, like water hyacinth and floating pennywort. The best approach seems to be to refer to our webpage (see above), as the list will be updated frequently.</i></p> <p><i>Listed species should not be for sale, so they would automatically not be planted.</i></p> <p><i>However, some of those species were already present in gardens before listing.</i></p> <p><i>We suggest to reformulatethe text, as it was not clear whether it referred to planting activities or to plants present in the outdoor areas.</i></p>	<p>has been harmonized to EU policy on invasive species (See section3.8.9)</p>
	<p><i>After a long long long discussion with the BEUC (I can send you the emails) with my colleague Gabrielle, we do think that INDEGENOUS is not the right word... "Adapted" is beter (please change the title)</i></p>	<p>Rejected</p> <p>Wording is aligned to EMAS BEMP report. BEMPs for tourist accommodation include "Planting of green areas with indigenous species to minimise irrigation requirements". (See section3.8.9)</p>
<p>Criterion 50 –</p>	<p><i>Toilet paper is in the scope of the criteria for Tissue Paper both in EU Ecolabel and Nordic Swan scheme. If it is</i></p>	<p>Although both products are in the same</p>

<p>Paper Products (up to 2 points)</p>	<p>written like this, the 90% used ecolabelled toilet paper may be calculated twice.</p>	<p>Product group, tissue and toilet paper are different products. For this case the applicant will need to show the packaging label (where the kind of product is specified) together with the relevant invoices. In addition it could be checked during the onsite visit. (See section 3.9.1)</p>
	<p>90% of the following categories of paper products of at least one of the following categories, used shall have been awarded the EU Ecolabel or other ISO Type I eco-labels (0.5 point each of the following categories, to a maximum of up to 3 points):</p> <p>a) Toilet paper (1.5 points) b) Tissue paper (1.5 points) c) Office paper (0.5 points) d) Printed paper (0.5 points) e) Converted paper (e.g. envelopes) (0.5 points)</p> <p>90% of paper products of at least one of the following categories, shall have been awarded other ISO Type I eco-labels (up to 1 points):</p> <p>a) Toilet paper (0.5 points) b) Tissue paper (0.5 points) c) Office paper (0.5 points) d) Printed paper (0.5 points) e) Converted paper (e.g. envelopes) (0.5 points)</p> <p>Comment: too low of a score will not be effective in promoting EU Ecolabel products.</p>	<p>Rejected</p> <p>During the revision process a majority of stakeholders highlighted that the purpose of ecolabelling is to support sustainable consumption as such and not a tool to promote other EU ecolabel products.. Therefore they were in favour to not limit the possibilities only to products with EU Ecolabel.</p> <p>Against this since TR3.0 for all criteria where EU Ecolabel is requested or is considered to be a means of proof, the alternative to use other ISO Type I labels has been included.</p>
<p>Criterion 51 - Durable goods (up to 3 points)</p>	<p><i>I'm still expectig the "at least 40% of night spend out-of site for professional purposes are bought in EE Ecolabel or other ISO-type 1 TAS"... you don't have to allow more point on this category... just add a line "for the image"</i></p>	<p>Rejected</p> <p>The requested requirement is not suggested to be added.</p> <p><i>night spend out-of site for professional purposes</i> is not a durable good. In addition with the aim to have more</p>

	<p>Criterion 51 - Durable goods (up to 34 points)</p> <p>At least 40% (rounded to the next integer) of at least one of the following categories of durable goods (1 point for each category, to a maximum of 36 points):</p> <ul style="list-style-type: none"> a) Bed-linen, towels and table clothes (2) b) Computers (0,5) c) Televisions (0,5) d) Bed mattresses (2) e) Furniture (2) f) Vacuum cleaners (0,5) g) Floor coverings (2) h) Imaging equipment (0,5) <p>present in the tourist accommodation shall have been awarded the EU Ecolabel or other ISO Type I eco-labels.</p> <p>At least 40% (rounded to the next integer) of at least one of the following categories of durable goods (±0,5 point for each category, to a maximum of 3 points):</p> <ul style="list-style-type: none"> a) <u>Bed-linen, towels and table clothes</u> b) <u>Computers</u> c) <u>Televisions</u> d) <u>Bed mattresses</u> e) <u>Furniture</u> f) <u>Vacuum cleaners</u> g) <u>Floor coverings</u> h) <u>Imaging equipment</u> <p>present in the tourist accommodation shall have been awarded the EU Ecolabel or another ISO Type I eco-labels.</p> <p><u>Comment: too low of a score will not be effective in promoting EU Ecolabel products.</u></p>	<p>simple criteria set, the aim is to focus on LCA/ EMAS BEMP report hotspots.</p> <p>Rejected</p> <p>During the revision process a majority of stakeholders highlighted that the purpose of ecolabelling is to support sustainable consumption as such and not a tool to promote other EU ecolabel products.. Therefore they were in favour to not limit the possibilities only to products with EU Ecolabel.</p> <p>Against this since TR3.0 for all criteria where EU Ecolabel is requested or is considered to be a means of proof, the alternative to use other ISO Type I labels has been included.</p>
<p>Criterion 52 -</p>	<p>We maintain that the criterion on returnable or refillable bottles (Criterion 52) is too generic. This was echoed by hotel owners. This criterion should only be there when an improved environmental impact (including transport of</p>	<p>Rejected</p> <p>EMAS BEMP report promotes the</p>

<p>Beverages provision (2 points)</p>	<p><i>empty refillable bottles) has been shown on a case-by-case basis.</i></p> <p><i>i'm not very comfortable with this criterion (the actual one seems to be better...) because not so many provider have returnable/refillable containers... for exemple here if you speak about sodas, only Coca Cola offers refillable bottles... Do you think that Coca Cola is environmentalaly friendly... I'm not sure.....</i></p> <p><i>We already discussed on that point : it's impossible to forbid cans on shops for campsites... I guest you will have nobody fullfilling this criterion... so if nobody fullfill, it's useless... or wrongly worded</i></p> <p><i>"Only returnable/refillable containers shall be used" : the criterion is too stringent and non-reachable. It would be interesting to put a percentage, because the offer of this type of products is low.</i></p>	<p>importance re-using products, as outlined in the waste hierarchy. (See section3.9.3)</p> <p>Partially accepted</p> <p>Although the criterion is ambitious, current criteria are also ambitious: O 73: Disposable drink containers (2 points) Disposable drink containers shall not be offered in the areas under the ownership or the direct management of the tourist accommodation.</p> <p>O 86: Returnable or refillable bottles (up to 3 points) The tourist accommodation shall offer beverages in returnable/refillable bottles: soft drinks (1 point), beer (1 point), water (1 point).</p> <p>In addition this is an optional criterion recognising best practices. However in order to recognise the difficulties achieving this criterion, two level of difficulty have been introduced. (See section3.9.3)</p>
<p>Criterion 53 - Detergents and toiletries procurement (up to 2 points)</p>	<p>Criterion 53 - Detergents and toiletries procurement (up to 2 points)</p> <p><i>At least 80% purchased volume or weight of at least one of the following detergent and toiletry categories (0.5 points each category, to a maximum of 2 points):</i></p> <ul style="list-style-type: none"> <i>a) hand dishwashing detergents</i> <i>b) detergents for dishwashers</i> 	<p>Rejected</p> <p>During the revision process a majority of stakeholders highlighted that the purpose of ecolabelling is to support sustainable consumption as such and not a tool to promote other EU ecolabel products.. Therefore they were in favour to not limit</p>

	<p><i>c) laundry detergent</i> <i>d) all purpose cleaners</i> <i>e) sanitary detergents</i> <i>f) soaps and shampoos</i> <i>g) hair conditioner</i></p> <p><i>used by the tourist accommodation shall have been awarded the EU Ecolabel or other ISO Type I eco-labels.</i></p> <p><i><u>At least 80% purchased volume or weight of at least one of the following detergent and toiletry categories (0.5 points each category, to a maximum of 1 points):</u></i></p> <p><i><u>a) hand dishwashing detergents</u></i> <i><u>b) detergents for dishwashers</u></i> <i><u>c) laundry detergent</u></i> <i><u>d) all purpose cleaners</u></i> <i><u>e) sanitary detergents</u></i> <i><u>f) soaps and shampoos</u></i> <i><u>g) hair conditioner</u></i></p> <p><i><u>used by the tourist accommodation shall have been awarded ISO Type I eco-labels other than EU Ecolabel.</u></i></p>	<p>the possibilities only to products with EU Ecolabel.</p> <p>Against this since TR3.0 for all criteria where EU Ecolabel is requested or is considered to be a means of proof, the alternative to use other ISO Type I labels has been included.</p>
<p>Criterion 54 - Chemical use minimisation (1.5 point)</p>	<p><i>In Criterion 54, “Chemical use minimisation”, “chemical-free” or “non-chemical” are rather unfortunate terms – micro-fibre products and other cleaning materials are also composed of chemicals. “Mechanical cleaning” would be a better title.</i></p> <p><i>As rationale, the pedagogic character of an EU Ecolabelled hotel / camping site was given in the AHWG. Cefic understands this rationale, but thinks that turning them into a criterion is not the right way, because the LCA, as mentioned correctly by the Commission, has not highlighted chemicals as an important environmental impact. The proposal of AT to have a cleaning plan may be a way out (see Criterion 2 – Staff training, point iv).</i></p>	<p>Partially accepted</p> <p>Wording has been modified for this criterion.</p> <p>To cover a larger range of the environmental aspects related to the Tourist Accommodation services it was considered relevant to use, besides LCA methodologies, other sources as the Best Environmental Management Practices report.</p> <p><i>“Best practice is also to train staff on the implementation of water- and chemical-</i></p>

		<i>efficient cleaning methods...</i> (See section3.9.5)
Criterion 55 - De-icing (1 point)	<i>on criterion 55 (de icing) could you answer the question if the TAS is closed during winter... and it nobody deice (the order is given to employees who work on the tas to be very careful either with snow or ice...)</i>	Partially accepted Minor modification has been introduced in TR4.0 as a response to the concern on the possibility that in the case that any de-icing was done the applicant could score points. With regard to ISO Type I labels (e.g Nordic Swan , see: http://www.nordic-ecolabel.org/criteria/product-groups/) (See section3.9.6)
	<i>Criterion 55 – De-icing: Normally, sodium chloride is best from its material efficiency (dichlorides coming second). Theoretically, you could even use sugar, but it has a very bad material efficiency. Also the temperature plays a role. Are you aware of any de-icers that have been awarded an ISO Type I eco-label?</i>	
	<i>Comment: this criterion should be deleted because in most cases de-icing is performed by local authorities. Furthermore its contribution to the environmental impact reduction appears to be irrelevant.</i>	
Criterion 56 - Used textiles and furniture (2 points)	<i>Critère 56 : Comme dans l'ancien référentiel, on valorise ceux qui <u>donnent</u> les meubles et textiles pour recycler mais pas ceux qui <u>réutilisent</u> : c'est incohérent !! Lorsque 80% des meubles d'une chambre d'hôtes n'ont pas nécessité de ressources (naturelles, chimiques etc..) car ils sont issus de brocantes, vente aux enchères etc.. , cela devrait être pris en compte./ Criterion 56: As in the previous standards, we value those who give the furniture and textiles for recycling but not those who recycle: it is incoherent !! When 80% of the furniture of a guest room did not require resources (natural, chemical etc ..) because they come from flea markets, auctions etc .., this should be taken into account.</i>	Accepted (See section3.9.7)
Criterion 57 - Composting (up to 2 points)	<i>d) waste produced by guests at their room/accommodation, Since title of the criteria is "composting", I think word "biodegradable" is missing.</i>	Accepted (See section3.9.9)
	<i>d) <u>food</u> waste produced by guests at their room/accommodation,</i>	
Criterion 58 - Waste water treatment (up to 3 points)	<i>Critère 58, point B : je suis très étonnée de trouver l'obligation de traiter les eaux usées dans les critères optionnels. A mon sens, il n'est pas envisageable d'accorder l'Ecolabel européen à un hôtel qui déverse ses eaux non épurées dans la nature ! Ce critère devrait être obligatoire./ Criterion 58, point B: I'm very surprised to find the obligation to treat wastewater in the optional criteria. In my view, it is not possible to grant the EU Ecolabel to a hotel that dumps its untreated water in nature! This criterion should be mandatory.</i>	Rejected This criterion refers to benchmark for sites where there is not access to centralized waste water treatment for this reason is optional. However this criterion does not prevent applicant to
	<i>Comment: this criterion should be deleted because its contribution to the environmental impact reduction appears to</i>	

	<i>be irrelevant and it doesn't deserve any point.</i>	comply with the legislation on wastewater treatment. (See following text in prerequisites section: 1. <i>The physical structure respects Community, national and local laws and regulations regarding energy efficiency and thermal insulation, water sources, water treatment and disposal (including chemical toilets), waste collection and disposal, maintenance and servicing of equipment, safety and health dispositions and any relevant laws or regulations of the area related to landscape and biodiversity conservation</i>). (See section3.9.9)
Criterion 59 - No smoking in rooms (up to 1.5 points)	<i>Criterion 59. Remove optional criterion and make No smoking, <u>mandatory (preferable)</u>, or, at least 90 % of rooms shall be non-smoking (mandatory) and one optional point if 100 % non-smoking.</i>	Partially accepted In TR4.0, this comment has been partially accepted and obligation on no smoking for at least 80% rooms/rental accommodations has been transferred to the mandatory criterion. (See section3.5.1and 3.10.1)
Criterion 60- Social policy (up to 2 points)	<i>Comment: this criterion should be deleted because its contribution to the environmental impact reduction appears to be irrelevant and it doesn't deserve any point. Furthermore it appears almost impossible to verify</i>	Rejected Although the EU Ecolabel is predominantly concerned with environmental issues, the EU Ecolabel Regulation 66/2010 which governs the scheme does allow social aspects to be considered, where they are relevant. Therefore it is proposed to include the employment requirements addressed in other environmental schemes for tourism

		which cover minimum national legislation and further. Stakeholders overwhelmingly supported the inclusion of this criterion. There are two levels of assurance in the verification process proposed for this criterion. The first level is mandatory and consists of a declaration including social policy dated and signed by staff. The second level comprises the possibility of the CB requesting additional documents and/or interviews to staff during the on-site visit, if it is considered necessary.
Criterion 61 - Tourist accommodation traffic management (up to 1.5 points)	<i>I'm a little bit tired to say say say and say again that this criterion will be fulfilled on every campsite because driving is forbidden at night... what doesn't mean that the campsite is environmentally friendly... the first part of the criterion needs to be more stringent !</i>	Partially accepted It is suggested to delete the requirement on the traffic regulation and to modify the title accordingly. (See section 3.10.3)
	<i>Comment: the first sub-criterion should be deleted because its contribution to the environmental impact reduction appears to be irrelevant and it doesn't deserve any point.</i>	
Criterion 62 - Environmentally preferable means of transport offer (up to 2.5 points)	<i>very demanding! will not be reached by a lot of businesses, better 1 bike for every 5 (or 10) rooms / units.</i>	Accepted Ratio bike/guest has been modified to bike/room. (See section 3.10.4)
	<p>Criterion 62 - Environmentally preferable means of transport offer (up to 2.54 points)</p> <p><i>a) The tourist accommodation shall provide at least one of following environmentally preferable means of transport offer to guests (1 point each, to a maximum of 2 points):</i></p> <p><i>i. Electric vehicles for guests pick up service and/or for guest's leisure (2 points)</i></p> <p><i>ii. Plugs (charging stations) for electric vehicles (2 points)</i></p>	Rejected Current wording and allocation of points provide certain flexibility to applicants to choose among the different possible actions.

	<p><i>iii. At least 1 bike for every 5 guests (with a minimum of 3 bicycles) (1 point).</i></p> <p><i>And/or</i></p> <p><i>b) The tourist accommodation shall have active partnerships with companies providing any of the following environmentally preferable means of transport detailed in requirement a) at a “walking distance” from the accommodation premises. (0.5 point).</i></p> <p><i>Assessment and verification: The applicant shall provide an explanation of how the tourist accommodation fulfils this criterion together with appropriate supporting documentation and with any information to be provided to guests.</i></p> <p><i>‘Active partnerships’ between tourist accommodation and e.g. 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. putting in evidence its promotional information. At a “walking distance” means that e.g. where the hire company is not based on the site of the tourist accommodation, some practical considerations should be made (e.g. the bicycle hire company may deliver bikes to the tourist accommodation service otherwise some practical considerations should be made).</i></p> <p><i>Comment: the score system should mainly booster the most environmentally significant actions.</i></p>	
<p>Criterion 64 - Local and organic products (up to 3 points)</p>	<p><i>BEUC and the EEB welcome requirements to promote organic food as well as local and seasonal products.</i></p> <p>A CB suggest that this criterion is moved to mamdatory section because of its really significant impact on the environment</p>	<p>Accepted (See section3.10.6)</p> <p>Rejected Regarding that this suggestion will suppose an increase of the ambition level and that the revision process is at a late stage it is felt to be risky to introduce the suggested change since there will not be more open consultation to stakeholders on the latest changes.</p>
<p>Criterion 65 - Pesticide avoidance (2 points)</p>	<p>Comment: the criterion should be deleted because it appears almost impossible to be verified in a reliable way.</p>	<p>Rejected Best practise suggests minimising the use of pesticides and other chemicals throughout the tourist accommodation.</p>

		A&V has been amended to require expert documentation. (see section 3.10.7)
Criterion 66 - Additional environmental and social actions (up to 4 points)	<p>Criterion 66. Keep points, but remove social action. It seems not clear what is meant. Moreover, the effect of additional environmental action should be documented.</p>	<p>Partially accepted</p> <p>It has been specified that benefits derived from the actions shall be documented by the applicant.</p> <p>With regard to the social actions, it is proposed to keep them as it has been requested by several stakeholders during this revision with the aim to adapt to a wider sustainability concept which includes social aspects. (See section3.10.8)</p>
	<p><i>SUPER TO SPLIT in 2 parts !!! keep it !!!! :)</i></p>	
	<p><i>Criterion 66 : should be separated in two different criteria.</i></p> <p><i>Could you separate in two parts this criterion. One dedicated to environmental actions and the other dedicated to social actions.</i></p> <p><i>The idea is to introduce a social criterion and/or some optional social criteria. And at least to have one optional criterion "Additional social actions" that could promote social actions conducted by TAS. Some of these actions may be retained for future social criteria or environmental criteria at the next revision.</i></p>	<p>Partially accepted</p> <p>A better differentiation has been introduced in the criterion by separating each type of actions into paragraphs. (See section3.10.8)</p>
	<p><i>Comment: the criterion should be deleted because its contribution to the environmental impact reduction is irrelevant and doesn't deserve any point.</i></p>	<p>Rejected</p> <p>It has been specified that benefits derived from the actions shall be documented by the applicant. (See section3.10.8)</p>

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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 Parctice

BEMPs	Best Environmental Management Practices
CB	Competent Body
CDP	chemical toilet disposal point
CSR	corporate social responsibility
CSS	camp site services
EDEN	European Destinations of Excellence
EEl	Energy Efficiency Index
EEIG EU	Hotel Standard Quality Seal
EMAS	Environmental Management and Audit Scheme
EMAS BEMP report	Best Environmental Management Practice in the tourism sector' [JRC IPTS, (2013)]
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
GO	Guarantee of Origin
GSTC	Global sustainable tourism council
GTBS	Green Tourism Business Scheme
GWD	Groundwater Directive (2006/118/EC)
HCMl	Hotel Carbon Measurement Initiative
HDD/CDD	Heating degree day/Cooling degree day
HES	Hotel Energy Solutions
HOTREC	Hotels, Restaurants and Cafes (the European Umbrella organisations for national associations representing hotels, restaurants, cafes and similar organisations)
HVAC	Heating, ventilation and air conditioning
IHG	InterContinental Hotels Group
ILO	International Labour Organisation
ISO	International Organization for Standardization
ITP	International Tourism Partnership
LCA	life cycle assessment

LED	light-emitting diode (lamp)
NACE	Nomenclature of Economic Activities
NECSTouR	Network of European regions committed to the issue of sustainable and competitive tourism
NOx	Nitrogen Oxides
RES	Renewable Energy Sources
SBS	Structural Business Statistics
TAS	tourist accommodation services
UHT	Ultra-heat treated (milk)
UNEP	United Nations Environment Programme
UNWTO	UN World Tourism Organization
WEEE	Waste Electrical and Electronic Equipment
WTTC	World Travel and Tourism Council

Annex I Existing EU Ecolabel criteria Tourist Accommodation/Campsite

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

M 1: Electricity from renewable sources

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

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

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

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

M 2: Coal and heavy oils

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

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

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

M 3: Efficiency and heat generation

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

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

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

M 4: Air conditioning

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

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

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

M 5: Energy efficiency of buildings

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

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

M6: Window insulation

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

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

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

M 7: Switching off heating or air conditioning

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

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

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

M 8: Switching off lights

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

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

M 9: Energy efficient light bulbs

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

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

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

M 10: Outside heating appliances

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

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

M 11: Water flow from taps and showers

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

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

M 12: Waste bins in toilets

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

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

M 13: Urinal flushing

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

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

M 14: Changing towels and sheets

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

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

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

M 15: Correct waste water disposal

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

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

M 16: Chemical toilet disposal point (CDP) (campsites only)

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

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

M 17: Disinfectants

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

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

M 18: Waste separation by guests

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

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

M 19: Waste separation

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

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

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

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

M 20: Disposable products

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

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

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation explaining how the criterion is fulfilled (including any legislation requiring use of

disposable products), and consistent documentation regarding the refillable products and/or on the information conveyed to the guests, concerning the encouragement to use non-disposable products (if applicable).

M 21: Breakfast packaging

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

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

M 22: No smoking in common areas

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

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

M 23: Public transportation

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

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

M 24: Maintenance and servicing of boilers and air conditioning systems

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

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

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

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

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

M 25: Policy setting and environmental programme

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

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

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

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

M 26: Staff training

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

Concerning energy saving:

— Staff shall be trained on how to save energy.

Concerning water saving:

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

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

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

Concerning chemical substances:

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

Concerning waste:

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

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

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

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

M 27: Information to guests

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

Specific actions for the different areas shall be:

Concerning energy:

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

Concerning water and waste water:

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

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

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

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

Concerning waste:

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

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

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

M 28: Energy and water consumption data

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

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

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

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

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

M 29: Other data collection

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

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

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

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

M 30: Information appearing on the eco-label

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

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

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

O 31: Generation of electricity through renewable energy sources

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

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

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

O 32: Energy from renewable energy sources

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

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

O 33: Boiler energy efficiency

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

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

O 34: Boiler NOx emissions

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

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

O 35: District heating

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

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

And in addition:

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

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

O 36: Combined heat and power — cogeneration

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

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

O 37: Heat pump

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

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

O 38: Heat recovery

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

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

O 39: Thermoregulation

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

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

O 40: Energy performance audits for buildings

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

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

O 41: Air conditioning

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

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

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

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

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

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

O 43: Bioclimatic architecture (3 points)

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

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

O 44: Energy efficient refrigerators, ovens, dishwashers, washing machines, dryers/tumblers and office equipment (maximum of 3 points)

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

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

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

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

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

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

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

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

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

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

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

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

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

O 45: Electric hand and hair driers with proximity sensor (up to 2 points)

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

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

O 46: Refrigerator positioning (1 point)

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

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

O 47: Automatic switching off lights in tourist accommodation (1.5 points)

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

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

O 48: Sauna timer control (1 point)

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

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

O 49: Swimming pool heating with renewable energy sources (up to 1.5 points)

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

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

O 50: Automatic switching off outside lights (1.5 points)

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

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

O 51: Use of rainwater (2 points) and recycled water (2 points)

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

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

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

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

O 54: WC flushing (1.5 points)

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

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

O 55: Dishwasher water consumption (1 point)

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

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

where:

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

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

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

O 56: Washing machine water consumption (1 point)

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

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

O 57: Tap water temperature and flow (1 point)

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

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

O 58: Shower timers (1.5 points)

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

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

O 59: Swimming pool cover (1 point)

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

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

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

Where de-icing of roads is necessary, mechanical means or sand/gravel shall be used in order to make roads on the tourist accommodation ground safe in case of ice/snow (1.5 points).

If chemical de-icing is used, substances which do not contain more than 1% chloride ion (Cl⁻) (1 point) or de icers that have been awarded the Community eco-label or other national or regional ISO Type I eco-labels (1.5 points) shall be used.

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

O 61: Indications on water hardness (up to 2 points)

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

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

O 62: Water saving urinals (1.5 points)

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

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

O 63: Indigenous species used for new outdoor planting (1 point)

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

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

O 64: Detergents (up to 3 points)

At least 80% by weight of hand dishwashing detergents and/or detergents for dishwashers and/or laundry detergent and/or all purpose cleaners and/or sanitary detergents and/or soaps and shampoos used by the tourist accommodation shall have been awarded the Community eco-label or other national or regional ISO Type I eco-labels (1 point for each of these categories of detergents up to a maximum of 3 points).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

O 65: Indoor and outdoor paints and varnishes (up to 2 points)

At least 50% of the indoor and/or outdoor painting of the tourist accommodation shall be done with indoor and/or outdoor paints and varnishes awarded the Community eco-label or other national or regional ISO Type I eco-labels (1 point for indoor, 1 for outdoor paints and varnishes).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

O 66: Car washing only in specially outfitted areas (1 point)

Car washing shall not be allowed, or shall be allowed only in areas which are specially equipped to collect the water and detergents used and channel them to the sewerage system.

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

O 67: Support to alternatives to artificial barbecue lighter (1 point)

Excluding artificial barbecue lighting products, alternative products such as rape seed oil, hemp products, shall be sold in shops.

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

O 68: Dosage of disinfectants (1 point) or natural/ecological swimming pools (1 point)

The swimming pool shall have an automatic dosage system that uses the minimum amount of disinfectant for the appropriate hygienic result (1 point).

Or

The swimming pool shall be of the ecological/natural type with only natural elements guaranteeing for the hygiene and safety of the bathers (1 point).

Assessment and verification: The applicant shall provide a technical documentation concerning the automatic dosage system or the type of ecological/natural swimming pool and its maintenance.

O 69: Mechanical cleaning (1 point)

The tourist accommodation shall have precise procedures for conducting chemical-free cleaning, such as use of micro-fibre products or other non-chemical cleaning materials or activities with similar effects.

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

O 70: Organic gardening (2 points)

Outside areas shall be managed either without any use of pesticides or according to organic farming principles, as laid down in Council Regulation (EC) No 834/2007, or as laid down in national law or recognised national organic schemes.

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

O 71: Insect and pest repellents (up to 2 points)

Architectural design of the accommodation and hygiene practices (such as building on stilts to prevent rats entering premises, use of mosquito nets and coils) shall ensure that the use of insect and pest repellents in the tourist accommodation is kept to a strict minimum (1 point).

If insect and pest repellents are used, only substances which are allowed for organic farming (as laid down in Regulation (EC) No 834/2007) or that have been awarded the Community eco-label or other national or regional ISO Type I ecolabels shall be used (1 point).

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

O 72: Composting (up to 2 points)

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

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

O 73: Disposable drink containers (2 points)

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

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with an indication of which such disposable products are used, if any, and the legislation requiring this.

O 74: Fat/oil disposal (up to 2 points)

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

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

O 75: Run-off from car parks (1 point)

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

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

O 76: Used textiles, furniture and other products (up to 3 points)

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

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

O 77 (campsite only): Regulation of traffic (1 point) (campsites only)

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

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

O 78 (campsite only): Campsite generated traffic (1 point) (campsites only)

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

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

O 79 (campsite only): Trolleys for guests on the campsite (1 point) (campsites only)

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

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

O 80 (campsite only): Unsealed surfaces (1 point) (campsites only)

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

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

O 81: Roof landscaping (2 points)

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

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

O 82: Environmental communication and education (up to 3 points)

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

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

O 83: No smoking in common areas and rooms (up to 1.5 points)

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

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

O 84: Bicycles (1.5 points)

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

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

O 85: Pick up service (1 point)

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

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

O 86: Returnable or refillable bottles (up to 3 points)

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

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

O 87: Use of rechargeable products (up to 2 points)

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

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation from the suppliers of the batteries and/or the refillers of the toner cartridges.

O 88: Paper products (up to 3 points)

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

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label.

O 89: Durable goods (up to 3 points)

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

Assessment and verification: The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label.

O 90: Local food products (up to 3 points)

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

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

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation

0 91: Organic food (up to 3 points)

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

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

0 92: Indoor air quality (up to 4 points)

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

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

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. As regards the fragrance free requirement, a list of components/ingredients of fragrance free washing and cleaning shall be considered as sufficient.

0 93: EMAS registration (3 points), ISO certification (2 points) of the tourist accommodation

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

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

0 94: EMAS registration (1.5 points) or ISO certification (1 point) of suppliers

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

Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO 14001 certification by at least one of his main suppliers.

0 95: Compliance by subcontractors with mandatory criteria (up to 4 points)

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

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

0 96: Energy and water meters (up to 2 points)

The tourist accommodation shall have additional energy and water meters installed so as to allow data collection on consumption of different activities and/or machines, such as rooms, laundry and kitchen service and/or specific

machines like refrigerators, washing machines, etc. (1 point). Every pitch has its own energy and/or water meter (1 point).

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

O 97: Additional environmental actions (maximum 3 points)

Either:

(a) Additional environmental actions (up to 1.5 points each, to a maximum of 3 points): The management of the tourist accommodation shall take actions, additional to those provided for by way of criteria in this Section or in Section A, to improve the environmental performance of the tourist accommodation. The Competent Body assessing the application shall attribute a score to these actions not exceeding 1.5 points per action.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a full description of each additional action the applicant wishes to be taken into account.

Or:

(b) Eco-label award (3 points): The tourist accommodation shall be awarded one of the national or regional ISO Type I eco-labels.

Assessment and verification: The applicant shall provide appropriate evidence of having been awarded an eco-label.

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