

EU ECOLABEL FOR TOURIST ACCOMMODATION AND CAMPSITES SERVICES

**BEUC and EEB comments to the criteria proposal
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Summary

In May 2015 the Joint Research Center (JRC) of the European Commission (EC) published a new version of the EU Ecolabel criteria for Tourist Accommodation and Campsite Services (TACS). The technical report and the draft criteria have been discussed at the 2nd Ad-Hoc Working Group (AHWG) meeting which took place on 27 May in Brussels.

Globally, BEUC and EEB have welcomed the draft from the JRC. In this paper we make a couple of suggestions which would from our perspective still enhance the value of the EU Ecolabel for Tourism Services.

BEUC and EEB support the requirement on 100% renewable electricity to be used for the provision of Ecolabelled tourism services. However, we are concerned that the technical report from the EC is not always accurate and coherent with regards to renewable electricity and that the proposal is not as ambitious as it sounds. It is not clear whether this criterion refers to between renewable energy sources (RES) tariffs or to suppliers' RES fuel mix. Therefore, we strongly encourage the JRC to make further research and to avoid any confusion between these terms as it can result in a loss of ambition.

We are concerned that a simplification and deletion of certain criteria such as on windows insulation and on bioclimatic architecture would result in less ambitious requirements and we are not supportive of this approach.

We are in favour of maintaining stringent criteria on social requirements and on on-site visits.

Finally, we strongly recommend to ban any outside heating appliances in any EU Ecolabelled tourism facilities.

Criteria simplification

The JRC proposes to reduce the number of criteria by approximately 30% and aims to focus on the environmental hotspots in order to optimize the environmental savings.

BEUC and EEB have doubts concerning the criteria simplification. While we understand the benefits of a simplified criteria set, we remind that many criteria with little environmental impact can strengthen and make visible the “green” image of the tourist accommodation and therefore contribute to educate customers. We therefore support the views expressed by hotels managers and campsites owners highlighting the added-value of these numerous criteria.

Definition of the scope

BEUC and EEB agree on the general definition of the scope of Tourist Accommodation and Campsites Services.

However, we recommend completing the definition of the Tourist Accommodation by adding the following (in bold):

“green areas include parks and gardens, which are open to guests **and which are under the management of the accommodation.**”

We consider that there is no point to take areas into account where the campsite owner has no influence.

Renewable electricity

In line with the Best Environmental Management Programme (BEMP), hotel managers and campsites owners should first of all be encouraged to make investments in renewable energy use on the premises, including renewable electricity generation (solar panels, wind energy, limited sustainable biomass, hydropower) and heating systems (solar thermal collectors, geothermal heat pumps, biomass heating systems, etc). As electricity generation capacities and heating systems are visible and contribute to green the energy supply of the accommodation, those investments should be reflected in EU Ecolabelled tourist services.

If no renewable electricity generation is feasible at the site, hotel managers and campsite owners have to refer to the national electricity market. While it is a widespread assumption that the liberalisation of energy markets would bring more competition, lower prices and better information on broader range of energy products, consumers in many Member states are still waiting to reap the benefits of truly competitive, consumer-friendly energy markets allowing them to make sustainable choices. Therefore, full enforcement of existing internal energy market legislation, Third Energy Package in particular, is fundamental.

Consumers in at least 15 Member States can already opt for renewable electricity tariffs covered by renewable Guarantees of Origin (RES-GOs). There are more and more such “green” tariffs offered, as well as suppliers emerging whose fuel mix is at 100% based on RES-GOs. In a context of growing renewable electricity offers, we welcome the criterion requiring that “100% of the electricity procured shall come from renewable energy sources” and we appreciate that the threshold has been raised from 50% to 100% in the new draft proposal. We understand this criterion as relating to both the product’s fuel mix as well as the supplier’s fuel mix, as disclosed to final customers, according to the Internal Electricity Market Directive 2009/72/EC.

However, as RES-GOs can be traded independent of the electricity sold to consumers, suppliers may still produce, trade and market non-renewable energy sources behind a “green façade”. Therefore, 100% renewable electricity offers and suppliers alone do not necessarily bring any environmental benefits. The renewable kilowatt-hour would have been produced anyway because the renewable power plant already benefited from a national support scheme, from selling electricity to wholesale markets or from other remuneration models. With constantly low prices, renewable energy plant operators do neither depend on selling RES-GOs nor do RES-GOs incentivise investments in new capacities.

Finally, we remind that renewable tariffs should bring the environmental benefits that consumers expect. These benefits must be measurable and go beyond business as usual. Consequently, minimum criteria regarding environmental benefits of “green” tariffs are needed. Examples for such standards could be:

- a binding communication on additionality to the regulator and to the consumer
- nationally harmonised, but voluntary definition of criteria
- or transparent national “green electricity” quality labels such as EKOenergy.

Energy performance internal audits for buildings

The JRC suggests shifting the criterion on Windows insulation to the criterion on Building efficiency.

Irrespective of the location of the criterion in the final document we insist that energy audits for buildings will be required which cover the building envelope aspects, including windows insulation. In addition, we strongly support the implementation of annual checks under the criterion on building efficiency.

Energy efficient light bulbs

We welcome the criterion to require a minimum rate of energy efficient light bulbs. However we rather suggest to raise the ambition level and propose to request higher percentages for year 1 (at least 50 % / 60 %, instead of 40%/50%).

Outside heating appliances

At the previous Ad-Hoc working group meeting the JRC proposed a criterion on Outside heating appliances stating as following:

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

BEUC and EEB reject this criterion on Outside heating appliances and therefore strongly support the option 2 which is to ban any outside heating appliances. The criterion proposed by the JRC is not acceptable from an environmental point of view as outside heating appliances are a wasteful use of energy.

In addition, we do not think that heated open spaces are among the main expectations of consumers when they go to ecolabelled facilities. This would undermine the “green” image of the accommodation and give contradictory signals to consumers, as these practices are not in line with the EU Ecolabel objectives.

Waste: Single-use products

We agree with the JRC proposal to limit the use of single-use products. However, we propose to replace the current wording with the following one:

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

The EEB and BEUC hold the view that there should be no obligation for service providers to proactively hand-out single-use products such as shower caps, brushes, nail files to guests. In case any obligations exists because of national legislation or because of an additional label which the service provider holds in addition to the Ecolabel, it should only be indicated to the consumer that such items are available on request.

Food should primarily come from local, sustainable and non endangered sources

We are in favour of keeping the criterion on “Local food products”. We support the objective that Ecolabelled Tourism services should not offer dishes which contain food from endangered species or unsustainable sources. We therefore support the criterion stating that:

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

However, in our view, the criterion does not tackle exactly local food but focuses on protected species. The arguments proposed by the EC is that:

- a. either species are protected by international law, so there is no need for a criterion or
- b. species are protected by regional / national law so it is difficult to handle in an European label

We suggest establishing an exhaustive list of species which production and consumption is not environmentally friendly at all, e.g. Pangasius, a large shark catfish, which lives in mangrove areas.

Bioclimatic architecture

In the previous criteria proposal, the JRC had suggested that “Buildings on the tourist accommodation ground shall be built according to bioclimatic architectural principles.”

BEUC and EEB hold the views that this criterion should be kept and further redefined.

We agree with the general idea of the criterion. However, we disagree with the definition proposed by the JRC. There are also variables such as the building process, the materials used, the building style, the natural breathing of the walls which that need to be taken into consideration in the definition.

Improving the definition and keeping bioclimatic architecture as a separate criterion is much more recommended than tackling only some very limited aspects in the criterion on the “building energy efficiency”. Provisions on bioclimatic architecture go beyond the aspect of energy efficiency. For instance, bioclimatic architecture has a relation to health issues such as indoor air quality and potential hazardous emissions from the materials used.

In addition, we suggest making the explanations of those principles clear and available in the “handbook” or brochures given to the clients when they arrive at the accommodation.

Detergents and disinfectants: Insect and pest repellents

We suggest keeping the criterion on insects and pests repellents, as already contained in the current document:

“Architectural design of the accommodation and hygiene practices (such as building on stilts to prevent rats entering premises, use of mosquito nets and coils) shall ensure that the use of insect and pest repellents in the tourist accommodation is kept to a minimum (1 point).

If insect and pest repellents are used, only substances which are allowed for organic farming (as laid down in Regulation (EC) No 834/2007) or that have been awarded a national or regional ISO Type I ecolabels shall be used (1 point).”

However, we would like to share some concerns with regard to the following issues:

- the provision of mosquito nets is not common in many parts of the world. Therefore, we recommend to specify in the criterion: ‘if regionally appropriate’
- We would like to have clarifications on the “mosquito coil”. As these coils are coated with chemicals we believe their use is not environmentally friendly and could have severe health effects. Some of the chemicals which are used on coils such as bis-chloromethyl ether (BCME) or Octachlorodipropylether (S-2) are known to cause lung cancers. We recommend the JRC to further investigate this issue and to look carefully into studies which indicate that there is a risk of lung cancer related to the exposure to mosquito coil smoke.
 - o *Exposure to mosquito coil smoke may be a risk factor for lung cancer in Taiwan*, U.S. National Library of Medicine National Institutes of Health, 2008, <http://www.ncbi.nlm.nih.gov/pubmed/18305363>.
 - o *Think about your lungs too*, Alpha Moscon Technologies, <http://alphamoscon.in/effects-of-mosquito-coil.html>.

Indigenous species used for new outdoor planting

With the aim to simplify the criteria set and regarding the difficulties on defining and verifying indigenous species, the JRC proposes to remove this criterion.

We strongly oppose this deletion because this criterion is very relevant from an environmental and biodiversity point of view, although the term “indigenous” needs to be further defined for clarification.

We propose to use the following definition: „plant species that can be found in the surrounding nature and are not specified as alien species”. This would refer to different geographic conditions such as north and south but takes also into account that vegetation differs with altitude. This specification excludes also invasive alien species.

Pick-up services

BEUC and EEB oppose the removal of the optional criterion 85 on pick-up services, stating: “The tourist accommodation shall offer guests travelling with transport a pick-up service at arrival via a car sharing or a collective transport scheme”.

The JRC justifies the removal by saying that this criterion on pick-up services will be covered under the current criterion 23 on Information to guests in the rearranged set of criteria. We disagree with this rationale as the criterion 23 does not provide any concrete measures, such as pick-up service, but is only about information.

We agree to include this requirement in the criterion 23 in order to simplify the set of criteria, but ONLY IF the JRC keeps the criteria on pick-up and adds concrete requirements on public transport.

Social criterion

We support the development of a new criterion on *Fundamental principles and rights at work* as the EU Ecolabel has to take also social considerations into account. We welcome the criterion aiming at restricting child labour and commercial exploitation, ensuring equal employment opportunities and fair employment practices. **Given the high importance of social concerns in the tourism sector related to workers and employees, BEUC and EEB hold the views that social requirements should be maintained AND made obligatory in the criteria set.**

We suggest making explicitly reference to International Labour Organisation (ILO) conventions and other United Nations Standards by keeping the current statement at the beginning of the criterion:

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

We also suggest completing the draft criterion by adding the following provisions (in bold):

“The accommodation offers equal employment opportunities **and working conditions** to women, local minorities and others, including in management positions, while ~~restraining~~ **excluding** child labour.”

This provision would comprise e.g same wages for women and men, as we know this is a critical and recurrent problem in the tourism sector.

Finally, we recommend adding the following concrete list of ILO regulations in the Annex of the EU Ecolabel criteria legal text. This list can be found in the draft criteria for Footwear published in May 2015:

Fundamental conventions of the ILO:

(i) Child Labour:

- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labour Convention, 1999 (No. 182)

(ii) Forced and Compulsory Labour:

- Forced Labour Convention, 1930 (No. 29) and 2014 Protocol to the Forced labour Convention
- Abolition of Forced Labour Convention, 1957 (No. 105)

(iii) Freedom of Association and Right to Collective Bargaining:

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98)

(iv) Discrimination:

- Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

Supplementary provisions:

(v) Working Hours:

- ILO Hours of Work (Industry) Convention, 1919 (No. 1)

(vi) Remuneration:

- ILO Minimum Wage Fixing Convention, 1970 (No. 131)
- Living wage: The applicant shall ensure that wages paid for a normal work week shall always meet at least legal or industry minimum standards, are sufficient to meet the basic needs of personnel and provide some discretionary income. Implementation shall be audited with reference to the SA8000 13 guidance on "Remuneration";

(vii) Health & Safety

- ILO Safety in the use of chemicals at work Convention, 1981 (No.170)
- ILO Occupational Safety and Health Convention, 1990 (No.155)

On the assessment and verification, we agree that the applicant shall show documentary evidence and inform the staff and customers about the different policies. Information to the staff is crucial as very often staff working in the tourism sector – especially foreigners seasonal workers, are not always well informed about their rights when those are country-specific. Informing them about rights and policies would put enough pressure on the employers to fulfil them.

On-site inspections

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