



APAT

**Italian National Agency for the Protection of the Environment and for
Technical Services**

CAMP SITE SERVICE EU ECO-LABEL AWARD SCHEME



THIRD ACTIVITY REPORT

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1 Conclusions from the Second AHWG meeting

Following the Meeting in Bruxelles, a Second Draft Criteria had been worked out, which incorporated the comments and changes proposed. This Draft has been discussed during the Presidential Meeting in Dublin on the 16th April 2004.

In that occasion and submitted by mail, several issues arose, which have been taken into consideration for the Third Draft Criteria, and are also treated in some chapters of this report. Among others, the most important were, in short order, concerns about security matters, the requirement to define some criteria more into depth and the request to position guest feedback in the mandatory section of the criteria.

In chapter nr. 4, the Explanatory notes to the 3rd Draft Criteria contain data and clarification to this regard, while chapter 3 offers a general view over the legislative and normative situation of safety aspects in the tourism sector and more specifically on camp sites. Part of this information will be included in the user manual, and the general requirements for applicants.

1.1 Updated version of the Product Group Definition

Answering to the request for a shorter and more compact definition of the product group Camp Site Service, the definition reads now as follows:

The product group “camp site service” shall comprise the provision, as a main service for a fee, of pitches equipped for mobile lodging structures¹ within a defined area as well as other accommodation facilities² suitable for the provision of shelter to lodgers³ and collective areas for communal services⁴. The “camp site service” offered within this defined area may include the provision of food services, leisure activities and green areas.

¹ Such as tents, caravans, mobile homes and campers.

² Such as bungalows, rental mobile lodging and apartments.

³ Such as travellers, guests and tourists.

⁴ Such as washing and cooking facilities, supermarkets and information.



2 European Legislation consideration

Introduction

In this chapter, the policy and legislation of the EU will be analysed starting from the conclusions of the research for tourist accommodation service. In particular, there is a need for an updating of the lines followed by the EU during the last years.

In this report, the main documents, which express EU environmental policy, will be listed. This is to be considered a very brief and non exhaustive synthesis of the work done.

The criteria proposed in the Third Draft Criteria have been linked to each environmental aspect.

2.1 Environment in EU

As reported in the General Report on the Activities of the European Union for 2003, this year “*was a year both of consolidation and of new challenges. Sustainable development remained the overarching objective, and the efforts to take the environment into account in the policies for other sectors were therefore stepped up. Major new developments in the four priority areas of the sixth environment action programme included adoption of an environment and health strategy and a proposal for a new policy on chemicals (REACH). Guidelines were laid down for the thematic strategies on resources, waste and recycling. Substantial progress was also made on climate change with the adoption of a directive on Kyoto instruments and a regulation on fluorinated greenhouse gases. At the same time, the European Union continued to play a leading role at world level in pushing for ratification of the Kyoto Protocol by the key parties*”.

Some years earlier, the Treaty establishing the European Union stated these objectives for its environmental policy:

- preserve, protect and improve the quality of the environment;
- protect human health;
- ensure a prudent and rational use of natural resources;
- promote measures at international level to deal with regional or worldwide environmental problems.

The Treaty of Amsterdam ratified the principle of sustainable development as one of the European Community's aims, and makes of a high degree of environmental protection one of its absolute priorities.

To set about achieving this as effectively as possible, the *Fifth Community Action Programme* on the Environment "Towards Sustainability" established the principles of a European strategy of voluntary action for the period 1992-2000 and marked the beginning of a "horizontal" Community approach which would take account of all the



causes of pollution (industry, energy, tourism, transport, agriculture, etc.). The energy sector was a priority in particular toward improvement of energy efficiency and promotion of renewable energy resources. The Regulation 1980/2000 Art.1.4 identifies the EU eco-label as one instrument to promote sustainability.

The *Sixth Environmental Action Programme*, “Environment 2010, Our Future, Our Choice” puts more stress on building awareness and sharing responsibility for the condition of the environment, which is indivisibly “our” environment. It proposes five priority paths of strategic action: improving the implementation of existing legislation; integrating environmental concerns into other policies; working closer to the market; empowering people as private citizens and helping them to change behaviour; and taking into account the environment in land-use planning and management decisions.

The *Treaty of Kyoto* requires the adherent nations to reduce their CO₂ emissions to 1990 levels, and then continue to diminish. There are both environmental and strategic reasons to diminish dependency from fossil fuels.

In order to enable the European Union to meet its obligations under the United Nations Framework Convention on Climate Change and the Kyoto Protocol, on 13 October the European Parliament and the Council adopted Directive 2003/87/EC establishing a Community scheme for greenhouse gas emission allowance trading to be phased in by 2012.

The European Council, on the occasion of the Ninth Conference of the Parties (COP9) to the United Nations Framework Convention on Climate Change in Milan (Italy)⁵ considered that one of the principal objectives of the European Union is to increase confidence in the Kyoto process and, to this end, it expected all developed countries to take the necessary measures, either to meet the commitments which they gave at Kyoto or to make comparable efforts to attenuate climate change⁶.

Presently European energy consumption comes for 41 % from oil, 22 % natural gas, 16 % from solid fuels (coal, brown coal, peat), 15% from nuclear and 6% from renewable sources. If nothing is done probably by 2030 the percentages of energy consumption in the EU shall be for 38 % from fossil fuels, a 29 % natural gas, 19 % solid fuels and only 6 % nuclear and 8 % renewable sources. In order to reach the 12% of the total energy consumption and the 22% of the electricity production from renewable sources, the States shall have to apply actions such as tax deductions, and other State financial aid, and it may very probably be that the prices of natural gas and of petroleum shall be differentiated as a start, and renewable sources be co-financed

For the countries of Central and Easter Europe, which will enter in the EU, the Commission has done a lot of environmental work under the PHARE programme and has encouraged the applicant countries to take part in the Life programme.

⁵ From 1 to 12 December 2003.

⁶ Bulletin EU 12-2003. Environment (19/23).



2.2 Energy policy

Since the Rio Convention in 1992 when sustainability was first named and environmental issues entered international considerations, a series of Directives and reports have brought to the identification and the implementation of measures directed at monitoring and saving energy.

In 2003, the Community adopted a programme for non-technological actions “*Intelligent Energy - Europe*” (EIE) from 2003-2006 in the field of energy efficiency and renewable energy sources⁷. The main aim of the programme is to support sustainable development in the energy context. The programme is structured in four fields:

SAVE – improvement of energy efficiency and rational use of energy, in particular in the building and industry sectors,

ALTENER - promotion of new and renewable energy sources for centralised and decentralised production of electricity and heat and their integration into the local environment and the energy systems

STEER - support for initiatives relating to all energy aspects of transport, the diversification of fuels, such as through new developing and renewable energy sources, and the promotion of renewable fuels (bio fuels) and energy efficiency in transport.

COOPENER - support for initiatives relating to the promotion of renewable energy sources and energy efficiency in the developing countries, in particular in the framework of the Community cooperation with developing countries in Africa, Asia, Latin America and the Pacific.

Very briefly here is a summary of European measures and policies on the subject of energy.

2.2.1 Energy efficiency

*Directive 93/76/EEC*⁸ intends to limit CO₂ emissions by increasing energy efficiency (program SAVE). This program mentions a number of actions, among which increasing the individual supply of heat to the consumer, which may regulate it according to need and pay according to consumption. The program asks for guarantee in maintenance, involving also energy consuming appliances in the service department (which in 1993 accounted for 40% of energy consumption and was foreseen to increase). It is well known that energy efficiency is closely linked not only to the technical features of the appliances but also to maintenance.

*Council Directive 92/42/EEC of 21 May 1992*⁹, which comes under the SAVE programme concerning the promotion of energy efficiency in the Community,

⁷ The programme was adopted by the European Parliament and the Council on 26 June 2003. It was published in the Official Journal of the European Union on 15 July 2003 (OJ, L 176, p 29-36) and entered in force on 4 August 2003.

⁸ Official Journal L 237, 22/9/1993.

⁹ Official Journal L 167 , 22/06/1992 P. 0017 - 0028.



determines the efficiency requirements applicable to new hot-water boilers fired by liquid or gaseous fuels with a rated output of no less than 4 kW and no more than 400 kW, hereinafter called 'boilers'.

This Directive is the frame of criteria 4 and 39 in the Third Draft.

This Directive represents the frame of the following criteria of the Third Draft: 4 - 30 - 39.

*Directive 92/75/EEC*¹⁰, the EU asked for the labelling of products, including household appliances, on their energy consumption. This Directive was implemented in the successive years for refrigerators, freezers, washing machines, dishwashers, lamps, dryers etc. and this enables the consumer to know how much the energy consumption of the appliance is. Directive 92/75/EEC establishes a classification of the efficiency of electrical appliances with respect to standard efficiency. The energy mark is obligatory and the appearance of the mark's label is regulated in the directives. Energy efficiency will be measured on a scale from A (or A+ or A++) to G, in which A means low and G means high energy consumption. The mark label will contain information about the appliance's model designation and its manufacturer or representative, but will also have a large amount of technical data as well as voluntary information about noise levels.

The Commission of the European Communities has issued a *Commission Directive 2003/66/EC of 3 July 2003*¹¹ amending Directive 94/2/EC¹² implementing Council Directive 92/75/EEC, with regard to energy labelling of household electric refrigerators, freezers and their combinations, and all frigo or mini-bars shall be at least class C. The amendment of Commission Directive 2003/66/EC revises energy labelling of household cold appliances (refrigerators and freezers) to take account of improvements in efficiency. Two new classes (A+ and A++) are introduced. The directive will be enforced on 1 July 2004.

Commission Directive 98/11/EC implementing Council Directive 92/75/EEC with regard to energy labelling of household lamps¹³. In the preliminary remarks of the Directive was stated that the scope for reduced energy use by lamps is substantial, because the electricity use by lamps account for a significant part of total Community electricity demand. Definitions and tests follow standards EN 255 and EN 814 for air conditioners. The surveillance authorities in each EU country are responsible for implementing this directive and for ensuring that these directives are being followed.

With regard to energy labelling of household dishwashers, the *Commission Directive 1999/9/EC*¹⁴ of 26 February 1999 amending Directive 97/17/EC¹⁵ have implemented Council Directive 92/75/EEC. In the preliminary remarks, Directive 97/17/EC points

¹⁰ Council Directive 92/75/EEC of 22 September 1992 on the indication by labelling and standard product information of the consumption of energy and other resources by household appliances (Official Journal L 297, 13/10/1992 p. 0016 - 0019)

¹¹ Official Journal L 170/10, 09/07/2003.

¹² Official Journal L 45, 17.2.1994, p. 1.

¹³ Official Journal L 71/1 10/03/1998.

¹⁴ Official Journal L 056, 04/03/1999 P. 0046 - 0046.

¹⁵ Official Journal L 118, 7.5.1997, p. 1.



out that the electricity by use dishwashers accounts for a significant part of total Community energy demand and that a better cleaning or drying performance often requires a higher consumption of water and energy.

Energy labelling of household washing machine is regulated by *Commission Directive 96/89/EC* of 17 December 1996¹⁶ amending Directive 95/12/EC¹⁷ implementing Council Directive 92/75/EEC with regard to energy labelling of household washing machines.

Directive 2002/31/EC of 22 March 2002 implementing Council Directive 92/75/EEC with regard to energy labelling of household air-conditioners¹⁸. This Directive shall apply to electric mains operated household air-conditioner as defined in European Standard EN 255-1, EN 814-1 or the harmonised standard referred to in Article 2 of the Directive. The directive defines the equipment capacity threshold at 12 kW: equipment with a capacity below 12 kW has to be energy labelled, as a means to influence consumer choice at the moment of purchase

Moreover, *Commission Directive 1995/13/EC*¹⁹ implementing Council Directive 92/75/EEC with regard to energy labelling of household electric tumble driers. This Directive excludes appliances that can also use other energy sources, as are combined washer-driers. As the Directive above, energy efficiency class goes on a scale of A (more efficient) to G (less efficient).

Directive 2002/31/EC represents the frame of criteria n 5 and 49 of the Third Draft.
 Directive 98/11/EC represents the frame of criterion 9 of the Third Draft.
 Directive 2003/66/EC amending Directive 94/2/EC represents the frame of criterion 50 (a) of the Third Draft.
 Directive 1999/9/EC amending Directive 97/17/EC represents the frame of criterion 50 (b) of the Third Draft.
 Directive 96/89/EC amending Directive 95/12/EC represent the frame of criterion 50 (c) of the Third Draft.
 Directive 1995/13/EC represents the frame of criterion 50 (e) of the Third Draft.

Finally, *Decision 2001/469/EC* of 14 May 2001²⁰ officially adopts in Europe the US Energy Star label for office appliances. This label takes into consideration both energy consumption and ergonomic factors, which make the appliance more comfortable for the user. Offices appliances include PCs, monitors, printers, fax, scanners, photocopy machines. All tests and limit values of Energy Star appliances are found on the web site: www.energielabel.nl/energylabels_energystarcriteria.htm or www.energystar.gov and in the approved proposal for the Council Decision concerning the conclusion on behalf of the European Community of an agreement between the US and the European

¹⁶ OJ L 338 , 28/12/1996 P. 0085 - 0085.

¹⁷ OJ L 136, 21.6.1995, p. 1.

¹⁸ Official Journal L 86/26 03/04/2002.

¹⁹ Official Journal L 136 of 21.06.1995.

²⁰ Official Journal L 172, 26/6/2001.



Community on the Co-ordination of Energy Efficient labelling programmes 99/0135 (CNS), signed in Brussels the 1st July 1999.

This Decision represents the frame of the criterion 50 (d) of the Third Draft.

2.2.2 Renewable Energy Sources

Directive 2001/77/EC²¹ on the promotion of the electricity produced from renewable energy source in the internal electricity market addresses an obligation to member states to establish a programme to increase the gross consumption of renewable energy based electricity (green electricity) by 2010. The Directive also calls on Member States to adopt and publish a report setting national indicative targets for future consumption of electricity produced from renewable energy sources for the next 10 years.

The Directive mentioned above represents the frame of the following criteria as the Third Draft: 1 - 3 - 37 - 38 - 41 - 42 - 43.

In the following table, the reference values for the fixing national indicative targets for electricity produced from renewable energy sources ("RES-E"), as referred to in Article 3 of the Directive.

member state (*0)	RES-E TWh 1997 (**)	RES-E % 1997 (***)	RES-E % 2010 (***)
Belgium	0.86	1.1	6.0
Denmark	3.21	8.7	29.0
Germany	24.91	4.5	12.5
Greece	3.94	8.6	20.1
Spain	37.15	19.9	29.4
France	66.00	15.0	21.0
Ireland	0.84	3.6	13.2
Italy	46.46	1.60	25.0
Luxembourg	0.14	2.1	5.7
Netherlands	3.45	3.5	9.0
Austria	39.05	70.0	78.1
Portugal	14.30	38.5	39.0
Finland	19.03	24.7	31.5
Sweden	72.03	49.1	60.0
United Kingdom	7.04	1.7	10.0
Community	338.41	13.9%	22% (***)

The development of renewable energy - particularly energy from wind, water, solar power and biomass - is a central aim of the European Commission's energy policy. There are several reasons for this:

Renewable energy has an important role to play in reducing Carbon Dioxide (CO₂) emissions - a major Community objective.

Increasing the share of renewable energy in the energy balance enhances sustainability. It also helps to improve the security of energy supply by reducing the Community's growing dependence on imported energy sources.

Renewable energy sources are expected to be economically competitive with conventional energy sources in the medium to long term.

²¹ Official Journal L 283, 27/10/2001.



The need for Community support for Renewable Energy is clear. Several of the technologies, especially wind energy, but also small-scale hydro power, energy from biomass, and solar thermal applications, are economically viable and competitive. The others, especially photovoltaic (silicon module panels directly generating electricity from the sun's light rather than heat), depend only on the rapidity of the increase of demand and thus on the volume of production needed to achieve the economy of scale necessary for competitiveness with central generation. In fact, looking at the various sector markets in early 2003, it is probably not over-optimistic to conclude that the lion's share of remaining market resistance to Renewable penetration relates to factors other than economic viability. This should be seen against the rapidly improving fiscal and economic environment being created in the EU both by European legislation itself swinging into full implementation and the Member States' own programmes and support measures, which despite the short-term macro-economic background, are accelerating rapidly at the time of publication. These developments are of course also the translation into reality of the Action Programme for Renewables contained in the 1997 White Paper.

The European Commission's White Paper for a Community Strategy sets out a strategy to double the share of renewable energies in gross domestic energy consumption in the European Union by 2010 (from the present 6% to 12%) including a timetable of actions to achieve this objective in the form of an Action Plan.

The main features of the Action Plan include internal market measures in the regulatory and fiscal spheres; reinforcement of those Community policies which have a bearing on increased penetration by renewable energies; proposals for strengthening co-operation between Member States; and support measures to facilitate investment and enhance dissemination and information in the renewables field

Which positive actions in the field of energy?

In conclusion, in the energy field the EU policies intends to achieve the following aims:

- reduce acid rain
- reduce CO e CO2 emissions
- reduce the use of fossil fuels
- reduce Nox emissions

Following, the appropriate actions have to be taken into consideration by the camp site manager:

- to save energy from the recovery of the heat
- to promote more environmental friendly energy sources (wind, solar, geothermal wave, tidal, hydro power, biomass, landfill gas, sewage treatment plant gas and biogases)
- to purchase the Eco-label product
- to implement control system to save energy and electricity
- to reduce electricity consumption



- to reduce heat dispersion
- to raise guest awareness to save energy
- to give priority to label products
- to carry out scheduled maintenance of heating/electricity/air conditioning system
- to promote natural ways to save and use natural resources
- to promote the application of general save energy principle
- to avoid unnecessary consumption of energy/electricity

In the Third Draft, the criteria, which satisfy the above conditions and aim, are: from 1 to 9 (mandatory) and from 37 to 56 (optional).

2.3 Water policy

The Treaty of the European Union at Article 174 already states the belief in prudent and rational use of natural resources, to be based on the precautionary principle and on the principles that preventive action should be taken, environmental damage should, as a priority, be rectified at the source and that the polluter should pay.

On 10 November 1995, the European Environment Agency in its report "Environment in the European Union - 1995" presented an updated state of the environment report, confirming the need for action to protect Community waters in qualitative as well as in quantitative terms.

In the EU report on Water there is the awareness stated in CE Directives that "all polluted water, whether polluted by households, industry or agriculture, returns back, one way or another, to the environment and may cause damage to human health or the environment²²".

The Commission Communication of 21 February 1996 on Community water policy defines the various types of pollution, which may affect water:

- point source pollution;
- diffuse source pollution;
- accidental pollution;
- acidification;
- eutrophication.

In order to prevent the first two, requirement that waste waters be disposed of after treatment is imperative. This relates to criterion n. 17, which does not allow eco-labelling to a camp site, which does not treat waste waters.

The newest document which tackles EU water policy is Directive 2000/60/EC²³ of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy.

It states the following main points:

²²Directives 91/271/CE ; 91/171/CE modified by directive 98/15/CE .

²³ Official Journal L 327 , 22/12/2000 p. 0001 - 0073.



- pre-treatment is the removal of stones, sand and fat/grease using mechanical processes such as screening, settlement or flotation.
- Nitrates directive (91/676/EEC) (aiming at preventing high concentrations of nitrates in water by limiting the polluting effects of intensive agricultural production and by reducing the use of chemical fertilisers.
- progressive reduction of emissions of hazardous substances to water is fundamental to maintain good water quality in freshwater and sea waters,
- even if the European situation is overall not bad, it is important to act in a preventive way and consider water not a completely renewable resource, therefore save it.

To back up the Community rules on the protection of water, on 19 September 2003 the Commission proposed specific measures to prevent and control pollution of groundwater, such as the definition of criteria for assessing the good chemical status of these waters and threshold values for pollutants.

In terms of implementation of actions which shall achieve the desired results, the Community's position is to have a transparent, effective and coherent legislative framework, which provides common principles and the overall framework for action to coordinate and integrate, and, in a longer perspective, further develop the overall principles and structures for protection and sustainable use of water in the Community in accordance with the principles of subsidiarity. This means that the single nations must look at their particular situation and designate sensitive and vulnerable areas.

Commission Directive 97/17/EC of 16 April 1997²⁴ implementing Council Directive 92/75/EEC with regard to energy labelling of household dishwashers.

The domestic appliances, which were awarded the European eco-label and can reduce water consumption are: dishwasher and washing machine.

For the first one, in 2001 was adopted a new *Commission Decision of 28 August 2001*, establishing the ecological criteria for the award of the Community eco-label to dishwashers (2001/689/EC). For the second one, criteria for being awarded the eco-label were established from 17 December 1999 until 1 December 2002. Commission Decision prolonging the validity of the criteria without change until 30 November 2005²⁵ (2003/240/EC).

Measurement methods and verification procedures for testing the washing effectiveness are as described in the European Standard of the European Committee for Standardisation EN 50242.

Which positive actions in the field of water?

In conclusion, in the energy field the EU policies intends to achieve the following aims:

- to reduce the potential waste of water
- to reduce the use of chemical substances

²⁴ Official Journal L 118, 07/05/1997, p 0001 - 0025.

²⁵ Official Journal L 89 on 5.4.2003.



- to prevent further deterioration and protects and enhances the status of aquatic ecosystems
- to promote sustainable water use
- to ensure the progressive reduction of pollution of groundwater
- to increase awareness of citizens

Following, the appropriate actions have to be taken into consideration from the camp site manager:

- to use automatic or manual flushing
- to train the staff to implement suitable procedures to save water or to prevent leaks.
- to reduce the time needed to regulate water temperature
- to decrease consumption of treated drinkable water for non drinking purposes
- to give efficient communication to guests
- to invite the guest to prefer actions that save water
- to promote coordination between guest and staff
- to use rainwater and recycled water
- to identify the best way to achieve water saving from taps and shower, in cooperation with the guests;
- to identify the best way to achieve water saving by reducing the quantity of water used for WC flushing
- to purchase ecolabelled washing/dishwashing machines
- to prefer energy class efficiency of appliances
- to install a system which enables to regulate the flow of water and to reach the desired temperature in a few seconds;
- to install systems which turn the shower off after a certain time

In the Third Draft, the criteria which take into consideration the actions and conditions above are: from n° 10 to n° 18 (mandatory) and n° 57 to n° 70 (optional).

2.4 Chemical substances policy

In the early days of the European Community it was recognised that there was a need to protect the Community's environment and to create common standards to protect consumers in order to ensure the free circulation of goods among the Member States. For this reason, the first Community environment legislation dealt with products, amongst them dangerous chemicals.

The *White Paper on the Strategy for a future Chemicals policy*²⁶, adopted on 13 February 2001, addresses the shortcomings of the current system. EU chemicals policy, as reported in the Paper, must ensure a high level of protection of human health and the environment as enshrined in the Treaty both for the present generation and future

²⁶ COM (2001), 88 final, Bruxelles 27/02/2001.



generations while also ensuring the efficient functioning of the internal market and the competitiveness of the chemical industry.

This Paper relates mainly to the following legislation:

- Council Directive 67/548/EEC on the classification, packaging and labelling of dangerous substances²⁷
- Directive 88/379/EEC on the classification, packaging and labelling of dangerous preparations²⁸
- Council Regulation (EEC) 793/93 on the evaluation and control of the risks of existing substances²⁹
- Directive 76/769/EEC on restrictions on the marketing and use of certain dangerous substances and preparations³⁰.

On 29 October 2003 the European Commission proposed the adoption of a regulation concerning the registration, evaluation, authorisation and restriction of chemicals (REACH), which would create a European Chemicals Agency and amend Directive 1999/45/EC³¹ and the regulation (EC) on persistent organic pollutants. At the same time it proposed amending Directive 67/548/EEC to adapt it to the new regulation. The objective is to improve the protection of human health and the environment while maintaining competitiveness and strengthening the spirit of innovation in the European chemicals industry. In addition, REACH would give the industry greater responsibility with regard to managing the risks posed by chemicals and communicating the safety data on substances, which would be transmitted along the production chain.

To reduce the quantity of pesticides used and the risks, which they pose, on 27 March 2003 the European Parliament broadly supported the general approach proposed by the Commission in 2002 with a view to formulating a thematic strategy on the sustainable use of pesticides. It called on the Commission to propose a European Union framework for integrated pest management and integrated crop management as one of the tools which could be used in national plans to achieve the sustainable use of pesticides; to further promote the use of low-input or pesticide-free crop farming; to propose guidelines for training and education of pesticide users; to consider the usefulness of establishing requirements for plant protection equipment and maintenance of the equipment; to consider the potential for economic instruments; to explore how different stakeholders (producers, consumers, distributors and users) could contribute to achieving sustainable use of pesticides; and to develop suitable indicators to measure the progress made.

²⁷ Official Journal L 196, 16/08/1967, p. 1.

²⁸ Official Journal L 187, 16/07/1988, p. 14.

²⁹ Official Journal 84, 05/04/1993, p.1.

³⁰ Official Journal L 262, 27/09/1976, p. 201.

³¹ Official Journal L 200, 30/07/1999.



Organic farming is enshrined in EU law (*Council Regulation EEC No 2092/91 of 24 June 1991*³²). This law feeds down into all European member states where an 'authoritative body' takes responsibility for insuring that legal standards are met.

This EU Regulation is the frame of the criterion 78 of the Third Draft.

In 1999, *Commission Decision of 28 May 1999*³³ stated criteria for awarding the Community Eco-label for detergents used for dishwasher machine.

The European Eco-label for all purpose cleaners and cleaners for sanitary facilities has been awarded: the Commission Decision of 27 June 2001³⁴ fix the criteria to satisfy to award the eco-label.

The *Commission Decision 2001/607/EC* of 19 July 2001³⁵ establishes the ecological criteria for the award of the Community eco-label to hand dishwashing detergents.

Commission Decision of 14 February 2003³⁶ establishes revised ecological criteria for the award of the Community eco-label to laundry detergents and amending Decision 1999/476/EC.

Consequences of the White Paper and several EU initiatives are not directly found in the criteria of this Eco-label for camp site service, because they rather involve industries and eco-label criteria development on goods directly linked to chemical substances. However, it is important to acknowledge the interest of the European Union on all aspects of the environment, and keep them in mind for what can be influenced by this service group.

It would be improper on our part to directly address the issue of chemical substances, as it would put us in a position of substituting ourselves to the developers of criteria, as stated above, on product groups which are not the product group "camp site service"; what has to be rightly requested is that staff be careful in appropriately dosing detergents, in order to avoid excessive quantities.

Which positive actions in the field of chemical substances?

In conclusion, in the energy field the EU policies intends to achieve the following aims:

- to reduce the environmental impacts due to chemical substances
- to reduce soil and water pollution trough avoiding the use of chemical substances;

Following, the appropriate actions have to be taken into consideration from the camp site manager:

- to use cleaning products which include as few chemical substances as possible
- to train staff to follow the instructions set on the package about the amount of chemicals to use

³² Official Journal L 198, 22/07/1991.

³³ Official Journal L 167/38, 02/07/1999.

³⁴ Official Journal L 189/24, 11/07/2001. The criteria are valid from 27 June 2001 until 26 June 2004.

³⁵ Official Journal L 214, 11/08/2001. These criteria are valid from 19 July 2001 until 18 July 2004.

³⁶ Official Journal 76/25, 22/03/2003. These criteria are valid from 1 March 2003 until 29 February 2008.



- to purchase eco-labelled chemical products (detergents, disinfectant, paints, varnishes)
- to define procedures on how to carry out cleaning without chemical substances
- to use special chemical sinks for the disposal of chemical toilet outlets
- to avoid the use of pesticides/herbicides for the management of green areas:

In the Third Draft, criteria which take into consideration these actions and aims are: from n° 19 to n° 21 (mandatory) and from n° 71 to n° 78 (optional).

2.5 Air and Noise policy

The air quality is one of the areas in which the European Union has been most active. As the result of EU legislation, much progress has been made in tackling air pollutants such as sulphur dioxide, lead, nitrogen oxides, carbon monoxide and benzene. The Sixth Environment Action Programme aims to achieve levels of air quality that do not result in unacceptable impacts on, and risks to, human health and the environment.

With a view to supplementing the specifications for air quality standards provided for in Directive 98/70/EC, on 3 March 2003 the European Parliament and the Council adopted Directive 2003/17/EC, which places an obligation on the Member States to reduce the sulphur content of petrol and diesel fuels by 2005 and to ensure full conversion to zero-sulphur fuels by 2009.

Further to its 1996 Green Paper (COM(96)540), the European Commission developed a new framework for noise policy, based on shared responsibility between the EU, national and local level, and including measures to improve the accuracy and standardisation of data to help improve the coherency of different actions.

On 16 July 2003 the European Commission proposed to set up, under the responsibility of the Member States, a system for monitoring ambient air concentrations and deposition of certain atmospheric pollutants (arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons)

In the Third Draft, criteria related to this field are: criterion n° 6 (“window insulation”), criterion n° 27 (“no smoking in common areas”) and criterion n° 84 - 85 (“regulation of camp site traffic” and “camp site generated traffic”).

2.6 Management of resources policy

On 7 February 2001, the Commission submitted a Green Paper on integrated product policy. Its approach to promote production and consumption of greener products is considered one of the major elements of the sixth environment action programme. The strategy advocated revolves around three objectives: to provide information, to encourage business leadership, and to take tax and financial measures.

On 18 June 2003, the Commission adopted measures to ensure continuity in implementation of the integrated product policy defined in its 2001 Green Paper, such as greening corporate purchasing and promoting environmental labelling. On 27



October 2003 the Council adopted conclusions containing recommendations with a view to developing environmental life-cycle thinking.

Directive 94/62/EC on packaging and packaging waste³⁷ requires to Member States to separately collect and dispose of waste in order to reach certain fixed levels of recovery and recycling of waste. Member States usually set up public bodies or cooperatives/consortiums with private bodies responsible for such purposes.

Council Directive 94/62/EC of 15 December 1994 on packaging and packaging waste requires the Member States to introduce systems for the return and/or collection of used packaging to attain the following targets:

- recovery: 50% to 60%;
- recycling: 25% to 45%, with a minimum of 15% by weight for each packaging material.

On 7 December 2001, the Commission presented a proposal for a directive of the European Parliament and of the Council, amending Directive 94/62/EC on packaging and packaging waste³⁸. This proposal lays down new, more ambitious targets for recovery and recycling, to be met by 30 June 2006. The overall recovery and recycling targets must be between 60% and 75%, and 55% and 70% respectively. Specific recycling targets were also fixed according to materials: 60% for glass, 55% for paper and cardboard, 50% for metals and 20% for plastics (mechanical and chemical recycling only). Greece, Ireland and Portugal were given until 30 June 2009 to meet these targets.

Directive 94/62/EC is the frame of criteria 22-24 of the Third Draft.

In terms of criteria requirement, in the case of the Eco-label on camp site service, it is possible that the criteria on separating waste and disposing of separate waste may not be applicable to more sites in these last countries, but it is intended that the EU eco-label may speed up times for compliance.

Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste which requires to reduce biodegradable waste going to landfill to 35% of 1995 waste quantities within eight years of the adoption of the Directive by Member States³⁹.

Community list of hazardous waste was established by Council Decision 94/904/EC and this Decision has been replaced by Commission Decision 2000/532/EC⁴⁰. This includes toners, inks, refrigerating equipment, batteries, and pharmaceuticals.

For a definition of waste and hazardous waste see terms and definitions hazardous waste Annex III Directive 91/689/EEC Properties of wastes, which render them hazardous, as shown on the packaging.

These Directives are the frame of criterion 23 of the Third Draft.

³⁷ Official Journal L 365, 31/12/1994.

³⁸ COM (2001) 729 final.

³⁹ O J L 182 , 16/07/1999 P. 0001 – 0019.

⁴⁰



Which positive actions to take in this filed?

In conclusion, in the management resource field the EU policies intends to achieve the following aims:

- increase separate collection of waste
- reduce the amount of production waste

Following, the appropriate actions have to be taken into consideration from the camp site manager:

- promote separate collection of waste at source, so as to allow recycling and appropriate disposal;
- ensure proper disposal of hazardous waste;
- maximise recycling and appropriate disposal;
- ensure that waste shall be transported to the appropriate disposal sites;
- to avoid unnecessary production of waste;
- reduce the production of organic waste;
- reduce voluminous waste.

In the Third Draft, criteria, which satisfy the above conditions, are: from 22 to 26 (mandatory) and 79 to 83 (optional).

2.7 Consumers information policy

Consumer policy is central to the EU objective of continuously improving the quality of life of all EU citizens. The aim of promoting the interests, health and safety of consumers in the EU is enshrined in articles 153 and 95 of the Treaty establishing the European Community.

Consumer policy involves:

- developing legislative and other actions;
- integrating consumer concerns in all EU policies;
- complementing Member States' consumer policy;
- empowering consumers by actively supporting EU consumer organisations and their involvement in policy making.

Consumer Policy initiatives and development depend on relevant and reliable information. Policy makers need to understand what matters most to consumers with supporting evidence. The Commission consults widely with interested stakeholders.

With enlargement of the EU, an important Commission aim is to ensure that the candidate countries apply the same high levels of consumer protection and consumer safety that exist in the EU. The Commission also promotes consumer policy and high



consumer safety and information standards in international forums and in relations with third countries.

Which positive actions to take in this filed?

In conclusion, in the information field the EU policies intends to achieve the following aims:

- to raise guest awareness
- to raise consumer perception

Following, the appropriate actions have to be taken into consideration from the camp site manager:

- inviting guests to support the environmental objectives of the environmental policy

In the Third Draft, criteria to raise the awareness/perception and/or to contribute to the environmental policy of the camp site are: 7 - 8 - 12 - 13 - 17 - 22 - 28 - 31 - 33 - 67 - 70 - 89.



3 Safety aspects in camp site

Introduction

It is important for a camp site to develop and maintain a comprehensive fire safety and prevention program, because often buildings are old, built of frame construction, used only seasonally, and in rural, unprotected locations, often also in protected areas and highly endangered woodlands. Fire prevention and safety therefore become a top priority.

During the second EUEB meeting in Dublin, a relevant number of Competent Bodies asked for a more specific inclusion of safety aspects in camp sites into the documentation for the Eco-Label.

Defining the boundary system of fire prevention and safety in camp sites turns out more complex than for tourist accommodation, for the following reasons:

1. the Council Recommendation of 22 December 1986⁴¹ on fire safety concerns hotels only; it implicitly excludes many smaller hotels, self-catering apartments and villas and thus does not cover a significant proportion, possibly the majority, of accommodations now used by tourists;
2. the subsequent studies and reports to improve the EU Recommendation and its application have concerned hotels⁴² only;
3. the specific situation of the camp site service, provided partly in open air, partly in fixed structure.

The Council Recommendation of 22 December 1986 was intended to “*define a minimum standard of fire safety for all hotels*” on the grounds that significant numbers of citizens of EU countries were travelling beyond their home country and were therefore entitled “*to adequate protection in the host country and to be informed of the nature and extent of that protection*”.

In 1994 a report was published under the title “Fire Safety in Hotels: Recommendations for Europe”⁴³ by the Confederation of Fire Protection Associations - Europe (CFPA-Europe) to set up a working party to review levels of fire safety in hotels and produce a consensus guide to how better protection could be provided.

In 1996, CETEN - APAVE started a study of compliance with Recommendations titled- Study on Fire Safety in Hotels and Accommodation Buildings - 1996.

In Conference in Luxembourg in 2001⁴⁴ pointed out some difficulties in the implementation of studies on hotel fires in Europe, for the following reasons:

⁴¹ OJ L 384 of 31.12.1986, p. 60-68.

⁴² CETEN - APAVE “Study of compliance with Recommendations commissioned” - 1996.

Stewart Kidd MA - “European Hotel Fire Safety: An Analysis of the Implementation and Impact of the 1986 EC Recommendations on Fire Safety in Existing Hotels” - October 2000 Report 095/00.

⁴³ Fire Safety in Hotels - Requirements for Europe(1994) CFPA Europe, The Fire Protection Association, London ISBN 0 902167 80-4.

Report from the Commission on application of the Council Recommendation of 22 December 1986 on fire safety in existing hotels (86/666/EEC) - Bruxelles - 27.06.2001 - COM (2001) 348 final.

⁴⁴ “A Review of Fire Safety Provision in Hotels in Europe” speech of Stewart Kidd, MA, MSc, FIFireE, FIFSM.



- no European Statistics Available
- some countries publish no fire statistics
- other statistics 'of variable content and quality'.

It is interesting to underline the conclusions of a Report on the effectiveness of the 1986 Recommendations⁴⁵:

1. there was an absence of information on the impact of the measures and on levels of enforcement;
2. there are 'grey areas';
3. more study is needed to identify the priorities for the introduction of 'high and coherent levels' of fire safety in all EU Hotels;
4. there needs to be a framework for establishing 'alternative solutions' i.e. a performance based approach to fire safety;
5. there should be more effort in strengthening controls and in distributing information
6. the Technical Guidelines in 666/86 should be updated;
7. best practices should be identified and promulgated.

3.1 The Technical guidelines of EU Recommendation 86/666/EC

The technical guidelines included in EU Recommendation 86/666 specify eight main areas in which safety precautions are to be taken:

Escape routes

The provisions concern aspects such as design, fittings, signs and accessibility and apply to doors (direction of opening), the presence of obstacles, the number of staircases and the maximum distances to reach them, maximum length of blind passages, etc.

Construction features

The fire resistance of building structures and floors, staircase enclosures, etc., are covered according to the number of storeys. Fire resistance is also a factor for the various types of internal compartmentation (partitions, doors, etc.).

Coverings and decorations

Depending on the area (escape routes, hallways, corridors, etc.) guidelines are given on the fire behaviour of the interior coverings and decorations.

Electric lighting

The provisions cover both the principal and the emergency lighting systems.

Heating

This covers both central heating systems and individual heaters and safety considerations include the ignition and spread of fires, specific requirements for the location of certain types of heating installations, shut-off devices for fuel supplies,

⁴⁵ Statement of European Commission 14 July 2001.



storage of fuel and, for example, maintenance of individual heaters and provision of instructions for their use.

Ventilation systems

The provisions cover shut-off devices for ventilation systems, and their location and identification, to ensure that they do not contribute to propagating fire, gas and smoke.

Fire fighting, alarm and alerting equipment

Points covered by the provisions include emergency fire-fighting equipment (availability of extinguishers, their location, accessibility and maintenance, etc.), the presence and characteristics of an acoustic alarm system, the provision for alerting the emergency services, training of staff in emergency procedures (instruction and training exercises).

Safety instructions

The guidelines essentially cover the content, location and comprehensibility of safety instructions to be followed in the event of fire, the various types of plans and evacuation instructions.

3.2 Other relevant legal provisions

Since the adoption of Recommendation 86/666/EEC there have been various Community initiatives.

The **Construction Products Directive**⁴⁶ draws up harmonised standards on the fire resistance of construction products, conformity with which by the manufacturer confers presumption of conformity with the safety standards of the Directive.

In the Annex 1 - Essential Requirements - have stated specific requirements to fire safety and health:

▪ Safety in case of fire

The construction works must be designed and built in such a way that in the event of an outbreak of fire:

- the load-bearing capacity of the construction can be assumed for a specific period of time,
- the generation and spread of fire and smoke within the works are limited.
- the spread of the fire to neighbouring construction works is limited,
- occupants can leave the works or be rescued by other means.
- the safety of rescue teams is taken into consideration.

▪ Hygiene, health and the environment

The construction work, must be designed and built in such a way that it will not be a threat to the hygiene or health of the occupants or neighbours, in particular as a result of any of the following:

- the giving-off of toxic gas,

⁴⁶ Council Directive 89/106/CE.



- the presence of dangerous particles or gases in the air.
- the emission of dangerous radiation
- pollution or poisoning of water or soil
- faulty elimination of waste water, smoke, solid or liquid wastes,
- the presence of damp in parts of the works or on surfaces within the works.

- **Safety in use**

The construction work must be designed and built in such a way that it does not present unacceptable risks of accidents in service or in operation such as slipping, falling, collision, burns, electrocution, injury from explosion.

This Directive, in conjunction with the appropriate standards, can contribute to increasing fire safety in new or renovated camp site in respect of the types of product used in their construction or conversion.

The **Council Directive 89/654/EEC** of 30 November 1989⁴⁷ concerning the minimum safety and health requirements for the workplace . Since it's coming into force, camp site as a workplace is therefore subject to the provisions on fire prevention and detection and on fire fighting. The Directive takes into consideration the following requirements (Section II - article 6) more specified in Annex I and II of the Directive:

- traffic routes to emergency exits and the exits themselves are to be kept clear at all times,
- technical maintenance of the workplace and of the equipment and devices, and any faults found which are liable to affect the safety and health of workers are to be rectified as quickly as possible,
- the workplace and the equipment and devices are to be regularly cleaned to an adequate level of hygiene,
- safety equipment and devices intended to prevent or eliminate hazards are to be regularly maintained and checked.
- workers and/or their representatives shall be informed of all measures to be taken concerning safety and health at the workplace.

3.3 The European Study CETEN APAVE

In 1996 a study was carried out for the Commission⁴⁸ to examine how the Recommendation had been implemented in the provisions applied by the Member States.

Two of the points emerged were that:

- the requirements of the Recommendation have, in nearly all cases, been adopted as national provisions and can therefore be regarded as minimum criteria which have been met and surpassed in most cases;
- half the Community countries have not accepted measures with retroactive effect. The measures are applied only in the case of conversion or extension work.

⁴⁷ Official Journal n° L 393 of 30.12.1989, p. 1.

⁴⁸ CETEN APAVE - Study on Fire Safety in Hotels and Accommodation Buildings - 1996.



Hotrec commented on the study guided by CETEN APAVE and recognised that there are measures in every Member States, which guarantee an overall level of safety, which is equivalent or superior to the Recommendation 86/666. HOTREC is contrary to an unification and streamlining of the existing national and regional legislation in a European Directive, but it is in favour of unification of existing legislation by the Member States. Furthermore, Hotrec asserted that the study lacked in considering the real conforming to safety requirements and indeed in establishing general requirements, owing to widely differing elements (architectural, climatic, location...) across Europe.

The Report by Steward Kidd - An Analysis of the Implementation and Impact of the 1986 EC Recommendations on Fire Safety in Existing Hotels - (2000) has come to the same conclusions in that the EU Recommendation is not been effective in providing an uniform minimum level of fire safety in hotels in Europe. Moreover, this study stated that, in spite of the CETEN APAVE study, the level of awareness of the 1986 Recommendations among hotel managers is low.

The most serious problems reported in the Study are the following:

1. Single, unenclosed or inadequate staircases (39%)
2. Uncompartmented corridors (33%)
3. Inadequate exit signs/emergency lighting (43%)
4. Obstructed or unusable escape routes (33%)
5. Inadequate fire training 55%
6. Poor compartmentation around hazard areas 35%
7. Poor fire safety management (50%)
8. Poor maintenance/inoperative equipment (27%)
9. Inadequate guest information/instructions (30%)
10. Very dirty kitchen range hoods with no built-in protection (25%)
11. Inoperable fire alarm systems/emergency lighting (15%)

The Study concludes that: *“the Commission should introduce a new Directive covering minimum standards of fire protection and fire safety for all properties used for accommodation by tourists and travellers. A standardised tariff of penalties for non-compliance should be made mandatory in all member states. The Directive should include technical advice on management, training and information for guests in addition to updating the technical elements of the 1986 Recommendations”*.

The Study suggests the main changes to EC Recommendation in:

- definition of hotel: this should encompass all types of accommodation open to the public used on a temporary basis in return for payment
- Essential Fire Safety Features
- Compensatory factors
- Management
- Information to guest
- Enforcement and certification
- Equipment standards, maintenance and reliability.



The Report for the Commission on application of the Council Recommendation 86/666 in 2001, had come to the following conclusions:

1. certain Member States have only partially brought their regulations into line with the Recommendation;
2. the objective of ensuring, via a Community instrument, that the consumer can rely on minimum and clearly defined safety levels applicable throughout the EU has not been fully achieved, particularly in view of the fact that certain Member States have restricted its application to new hotels or new work on existing hotels;
3. it is necessary to incorporate them into a new recommendation more detailed, appropriate and concrete provisions for existing hotels in cases where the guidelines in Recommendation 86/666/EEC cannot be applied;
4. there is need of updating and improving technical guidelines;
5. it should be made sure that any new Recommendation could be applied to other forms of accommodation similar to hotels;
6. identification and dissemination of best practice in fire safety management and monitoring are required..

3.4 A brief analysis of national legislations

Also for camp sites, the elements to take into consideration for safety as result of the national regulations listed below are:

- Emergency exits
- Fire Equipment safety and maintenance
- Staff awareness
- Clearly understandable and visible guest information
- Emergency and safety action plan

Italy

In Italy, the law 1965/966 (art. 2) and following amendments (DPR 577/1982, art. 15) imposes camp site structures to have a fire prevention certificate issued by fire brigade provincial headquarters after an on-site inspection, official recognition received of camp site structure compliance to the regulation. The law doesn't specify which type of documents has to be attached.

The law 9 aprile 1994 - - *Approvazione della regola tecnica di prevenzione incendi per la costruzione e l'esercizio delle attività ricettive turistico-alberghiere* – does not include camp sites . Thus, they are submitted to the inspection of a special Commission.

Obviously, each camp site has to satisfy the technical building requirements, hygiene-sanitary and safety as provided from legislation.

France

In France, according to *Décret n° 94-614 du 13 juillet 1994 - relatif aux prescriptions permettant d'assurer la sécurité des occupants des terrains de camping et de stationnement des caravanes soumis à un risque naturel ou technologique prévisible*, in



the Title II: *Prescriptions d'information, d'alerte et d'évacuation*.demands that the competent body, according to articles R. 443-7-4 - *du Code de l'urbanisme*, require for each camp site regulations on information, alarm and evacuation to guarantee guest and staff safety. The regulation on information includes:

- providing guests with a document which explains the measures to observe and the measure adopted by the camp site
- publishing a notice about any information about the safety in camp site

Therefore, the *decrée* provides: regulations for camp site manager for actions to implement and procedures for using the alarm in case of danger; regulations for evacuations and the condition for its authorization.

The regulations on information, alarm and evacuation have to be shown in a regulation book on safety, based on a model established by *des ministres chargés de l'intérieur, de l'environnement et du tourisme*.

Spain

In Spain, the Orden 28 de junio de 1966 - "*Orden por la que se aprueba la ordenación turística de los Campamentos de Turismo*" - the art. 3.2 specifies that the opening of the camp site is subordinate to a document, which guarantees the abiding by the minimum legal requirements about fire prevention.

The art. 4.12 regulates the requirements for a fire safety system. The elements taken into consideration are:

- staff awareness and information about the instructions and practice in case of fire
- general plan for clear and very visible emergency exits.

In **Cataluna**, in the Ordre d'11 de juliol de 1986, *per la qual s'estableixen els requisits per a la instal·lació i el funcionament dels càmpings*, art. 9 regulates the fire prevention system and fixes the following requirements:

- fire extinguisher
- emergency light for the exit of guest, staff and vehicles
- a visible plan in case of fire located in the reception, in local language, French and English
- management authorization about the execution of activities with high fire risk
- staff instruction and training

Portugal

In Portugal, the regulation of camp site in art. 22 requires camp sites to have an efficient fire safety system. Staff have to be trained in the use of fire extinguisher and to put into action more efficient actions in case of fire.

United Kingdom

In UK, the camp site has to fulfil its statutory obligations, including having applied for a certificate under the Fire Precautions Act 1971 (if applicable).



The ETC (English Tourism Council) Minimum standard for holiday parks and touring parks, required by the British Graded Holiday Park Scheme, provides a series of minimum requirements, including requirements for “health and safety” as follows:

- a proper first aid kit must be readily available. Emergency notices must be displayed giving details and location, park contact, telephone, doctor, fire service, local hospital and other essential services
- the park must have fire fighting equipment and notices
- all electrical installation on the park both internally and externally must have the appropriate safety classification.

The provision of fire-fighting equipment in parks is mandatory although the type and range may vary, but they have to satisfy the local Fire Officer’s requirements. The aspects to take into consideration for the assessment of the structure are:

Positive Aspects

- highly visible fire points.
- Points that are well maintained and painted although they need not necessarily be painted red.
- if equipment locked in cupboards or cabinets allows swift access.
- Extinguishers or extinguisher boxes which are secured on posts or walls are fixed firmly and securely
- Hoses which are tidily wound on reels.
- Equipment and/or reels, which have some protection from the elements.
- some effort has been made to make the facility as attractive as possible.

Negative Aspects

- where the keys for the equipment are held at reception, and to gain access in an emergency, one would have to go there.
- Fire action instructions not clearly displayed together with the location of nearest telephone.
- Equipment that is rusty and has leaks or holes or is otherwise poorly maintained.
- Hoses, stirrup-pumps, shovels, brooms or other items of fire fighting equipment, which are damaged, broken or fail to work smoothly and efficiently.

The *Lewes district council caravan sites and control of development act 1960 public health act 1936 conditions for the issue of a licence for use of land as a caravan or camping site* provides a series of detailed requirements for fire precautions. Fire precautions shall be undertaken in accordance with the recommendations of the East Sussex Fire Brigade and shall include the provision of a fire-fighting appliances, as stated in the article, including:

- fire points
- fire fighting equipment
- fire warning

The law states a series of conditions:

- maintenance of alarm and fire fighting
- fire notice
- fire hazard
- telephone



3.5 Conclusions

A community regulation, recommendation or decision concerning the safety in camp sites does not yet exist. However, waiting for a broad definition of the object of the EU Recommendation 666/86 which includes also camp sites in the future, the minimum frame for safety in camp site is represented by the Recommendation mentioned above and the two EU Directives: Council Directive 89/654/EEC and Council Directive 89/106/CE.

The studies and researches mentioned above have shown that the national legislation on safety can obtain better performances than the European instruments.

It appears therefore appropriate to prefer the instrument performing the best actions possible for the safety of guests, staff and camp site management.

An article published in Camping Magazine, Nov-Dec, 1998, by Ed Schirick - American Camping Association - is interesting for this analysis, because it provides a synthesis of the regulations and standards that must be considered when developing a written fire prevention and safety plan and to identify potential fire hazards and it focuses on developing a written fire prevention and safety plan and creating an emergency action plan.

It traces some of the following fields of intervention useful to list the fire hazards.

- *Extinguish Kitchen Fire Risks:* Be sure all fire prevention and protection equipment and material is properly installed. Also, make sure all cooking equipment is properly installed, meets manufacturer specifications.
- *Seek professional fire safety advice:* prefer professional fire safety contractor which examines the system and ensures it is still providing the intended protection against the risk of fire
- *Identify High-Risk Buildings*
- *Electrician:* use a licensed electrician to inspect and prepare your current electrical service before camp opens each summer of unplugging appliances
- *Following ground rules:* All outlets should be properly grounded
- *Store chemical properly:* ensure that chemicals are handled and stored separately, away from anything that could cause a fire or explosion, such as air, water, heat, or other chemicals. . Flammables, such as paint, shellac, varnish, wood stain, gasoline, kerosene, turpentine, and similar liquids, should be:
 - * stored in approved, airtight metal containers.
 - * kept only in needed quantities.
 - * used in adequately ventilated areas.
 - * stored away from heat and fire; smoking should not be permitted near flammables.
- *Keep Camp Tidy:* keeping maintenance areas, workshops, kitchen storage areas, and other places in camp neat and clean reduces the risk of fire
- *Recognize Other Fire Hazards:* take some time to consider potential fire hazards. Prepare your list of hazards, propose solutions to reduce them, and add the list to your risk-management plan
- *Develop a Written Fire Prevention and Safety Plan*



- *Start a list and share it:* Start with the list of fire hazards and risks identified previously as part of the risk management process. Share them with key management staff and year-round employees, including caretakers. Ask them to review the list and add to it from their own perspective and experience.
- *Form a safety committee:* The safety committee can help increase awareness and educate staff and campers about fire prevention and safety. The basis of the safety committee's training and education will come from the risk identification, risk reduction, and control work the director and key staff did earlier. Create an Emergency Action Plan
- *Escape procedures and route assignments:* the emergency action plan for fire should include emergency escape procedures and route assignments.
- *Sounding the alarm:* decide in advance how many times and how long the alarm at camp will sound.



4 Third Draft Criteria

4.1 Explanatory notes

Introduction

Following the 2nd AHWG in Bruxelles and the Presidential meeting in Dublin, the 2nd Draft Criteria has been integrated and corrected according to the comments received and further research carried out.

The optional criteria have been analysed according to the evaluation carried out by the experts and the comparison with national Eco-Labels, and scores have been confirmed or updated subsequently (see also chapters 4.2. and 4.3.)

This document will shortly set out the changes made and the reasons for them.

Modified or new parts in the text will be underlined.

Also, the ten new optional criteria will be presented and explained.

4.1.1. Changes in existing criteria and insertion of new criteria

Mandatory criteria

WATER

11. Water flow from taps and showers

The water flow of the taps and showers excluding bath taps shall not exceed 10 litres/minute.

Explanation:

Most other national labels name 8 or 10 litres per minute as maximal consumption for showers and taps. According to expert opinion, this is not a difficult target to achieve with the help of flow reduction shower heads and taps.

DETERGENTS AND DISINFECTANTS

19. Chemical toilet disposal point (CDP)

Where the camp site is connected to a septic tank, the waste from chemical toilets shall be separately 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.

Explanation:

The concept of Chemical Disposal Point has been explained more into detail. Further information will be contained in the user manual.

WASTE

26. Disposable products



Unless required by law, none of the following disposable products shall be used in rental accommodation and shops:

‘One-portion’ or ‘one-use’ toiletries (such as shampoo, soap, shower caps, etc.). Where any other disposable products are used, specific containers for disposal according to local and national systems have to be present in the location where such use occurs.

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 and the legislation requiring this, and description of type and system of waste collection

Explanation:

As from the recent discussion, disposable plates, glasses and cutlery are a typical part of the “take away” and “snack” restaurant service traditional to camp sites, which cannot afford to forget these products. Since the environmental impact of the waste brought about by this practice results very high, the decision has been made to insert a clause regarding the need for proper collection and disposal of the waste caused by these products.

OTHER SERVICES

31. Policy setting and action program

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

The action program shall identify targets on environmental performance regarding energy, water, chemicals and waste, which shall be set every two years, taking into consideration the optional criteria. It shall identify the person who will act as the environmental manager of the camp site and who is in charge of taking the necessary actions and reaching the targets. Comments and feedback from guests shall be invited and taken into account.

Explanation:

During the discussions, it has been agreed upon that the former wording “Comments and complaints” should be replaced with the more positive “Comments and feedback”.

33. Information to guests

The camp site shall provide information to the guests on its environmental policy, including safety aspects, the actions taken and the EU eco-label. Information shall be actively given to the guests at the reception, together with a questionnaire covering their views about the environmental aspects of the camp site. Notices inviting guests to support the environmental objectives shall be visible to the guests, especially in the common areas and the rental accommodation.

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

Explanation:

a) From several sides the need for making guests more aware of safety aspects and procedures has been worded. Since these aspects can involve environmental impact (fire and hazardous substances), it has been decided to include safety aspects into the required information for guests. The 3rd Activity report contains a chapter on those issues, which will also be reflected in the user manual.

b) Feedback from guests on the environmental measures has been recognized as a very important aspect of the eco-label itself, and therefore the questionnaire, which until the 2nd Draft was contained in optional criterion nr. 89 has now been made integral part of this, mandatory, criterion, which represents also a further interaction with EMAS.



34. Energy and water consumption data

The camp site shall have procedures to collect and monitor data on overall energy consumption (kWh), electricity and other energy sources consumption (kWh), and water consumption (litres). Data shall be collected with every bill received, or at least every three months, according to opening season, and shall also be expressed as consumption per overnight stay (*and per m² of indoor area*). The camp site shall keep available the results for site inspections by the Competent Body that assessed the application.

Explanation:

Camp site service is mostly a seasonal enterprise, and therefore the need for specifying that the data collection will have to take place only during opening season arose.

Optional criteria

ENERGY

37. Photovoltaic, hydroelectric and wind generation of electricity (2 points)

The camp site shall have a photovoltaic or local hydroelectric system or wind power electricity generation that supplies or will supply at least 20 % of the overall electricity consumption per year.

Explanation:

Since hydroelectric power generation plants on a large scale do not guarantee a low environmental impact, this criterion includes only local initiatives, which provide power directly from small hydroelectric systems.

51. Energy efficient refrigerators (1 point), dishwashers (1 point), washing machines (1 point), dryers/tumblers (1 point) and office equipment (1 point) (up to 5 points)

(a) (1 point): All household refrigerators shall be of Class A, A+ or A++ efficiency according to Commission Directive 2003/66/EC of 3 July 2003 amending Commission Directive 94/2/EC of 21 January 1994 implementing Council Directive 92/75/EEC with regard to energy labelling of household electric refrigerators, freezers and their combinations⁴⁹, and all frigo- or mini-bars shall be at least class C. The Commission Directive 2003/66/EC will enforced on 1 July 2004.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the refrigerators and frigo- or mini-bars, indicating those that have an eco-label.

(b) (1 point): All household dishwashers shall be of class A energy efficiency as laid down in Commission Directive 1999/9/EC of 26 February 1999⁵⁰ amending Directive 97/17/EC⁵¹ implementing Council Directive 92/75/EEC with regard to energy labelling of household dishwashers.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the dishwashers, indicating those that have an eco-label.

Note: dishwashers not covered by Directive 1999/9/EC amending Directive 97/17/EC (e.g. industrial dishwashers) need not comply.

(c) (1 point): All household washing machines shall be of class A energy efficiency as laid down in

⁴⁹ OJ L 45, 17.2.1994, p. 1.

⁵⁰ OJ L 021 , 26/01/2000 p. 0042.

⁵¹ OJ L 118, 7.5.1997, p. 1.



Commission Directive 96/89/EC of 17 December 1996⁵² amending Directive 95/12/EC⁵³ implementing Council Directive 92/75/EEC with regard to energy labelling of household washing machines

Assessment and verification: The applicant shall provide documentation indicating the energy class of all the washing machines, indicating those that have an eco-label.

Note: washing machines not covered by Directive 96/89/EC amending Directive 95/12/EC (e.g. industrial washing machines) need not comply.

(d) (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 2422/2001 of the European Parliament and of the Council of 6 November 2001 on a Community energy efficiency labelling programme for office equipment⁵⁴.

Assessment and verification: The applicant shall provide documentation indicating the qualification for the energy star of the office equipment, and/or indicating those PCs and portables that have an eco-label.

(e) (1 point): All electric tumble driers shall be class A energy efficiency as laid down in Commission Directive 1995/13/EC implementing Council Directive 92/75/EEC⁵⁵.

Assessment and verification: The applicant shall provide documentation indicating the energy class of all electric tumble driers, indicating those that have an eco-label.

Note: electric tumble driers not covered by Directive 1995/13/EC amending Directive 92/75/EC (e.g. industrial tumble driers) need not comply.

Explanation:

The criterion has been updated with the newest EU-Directives

51. Electric hand and hair driers with proximity sensor (1 point) (New criterion)

Electric hand and hair driers shall be outfitted 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 camp site fulfils this criterion.

Explanation:

Electric hand and hair driers of older build and/or with only a timing device to regulate heating are very energy expensive.

55. Swimming pool heating with RES (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.

Explanation:

Score change based on specific evaluation of criterion in the framework of camp site service (see chapter 4)

56. Automatic switching off outside lights (1,5 points)

Explanation:

Score change based on specific evaluation of criterion in the framework of camp site service (see chapter 4)

WATER

⁵² OJ L 338 , 28/12/1996 P. 0085 - 0085.

⁵³ OJ L 136, 21.6.1995, p. 1.

⁵⁴ OJ L 332, 15.12.2001, p. 1.

⁵⁵ Official Journal L 136 of 21.06.1995.



59. Water flow from taps and shower heads (1,5 points)

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

Explanation:

Most of the other national labels name 8 l as maximal consumption even in the mandatory criteria, and 8 l per minute is a limit easily reachable with the help of flow reduction shower heads and taps.

64. Shower timers (1,5 points)**Explanation:**

Score change based on specific evaluation of criterion in the framework of camp site service (see chapter 4)

68. Waterless urinals (1,5 points) (New criterion)

At least 50% of all urinals shall use a waterless system.

Assessment and verification: The applicant shall provide detailed supporting documentation of how the camp site fulfils this criterion.

Explanation:

Waterless urinals have the potential to save approximately 150.000 l of water per urinal per year in heavy usage scenarios. Waterless systems incorporate a dual seal to insulate the bathroom environment from sewer gases. There is a standing liquid barrier of greater than two inches, which is covered by a low-density, water-insoluble surfactant similar to olive oil in terms of its physiochemical properties. The polymeric surfactant, which is used as a sealant, is biodegradable and non-toxic, but permeable to higher density urine streams. This commercially available surfactant forms an added barrier or seal, which prevents the back-diffusion of undesirable sewer gases into the airspace of a restroom. Because of this added sealant, which floats on top of a normal water barrier, the waterless systems provide even greater protection to the local atmospheric environment from gases and bacteria than the traditional water-only trap systems in conventional flush urinals. They also use no de-scaling chemicals, detergents, strong cleaning chemicals or acid treatment materials, as are prevalent with most manual and automatic flushing urinals.

69. Indigenous flora used for new outdoor planting (1 point) (New criterion)

Any new planting of outdoor areas shall be composed of local and possibly robust species of vegetation, in order to minimize necessity of watering and treatments.

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

Explanation:

Local flora is better adapted to climate and potential parasites or illnesses than imported species. There will therefore be less need of chemical treatments and watering.

DANGEROUS CHEMICALS**73. Car washing only in specially outfitted areas (1 point) (New criterion)**

The cleaning of cars shall be permitted only in areas, which are specially outfitted to collect the water, and detergents used and convey them to the sewage system.

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



Explanation:

The detergents used to clean and polish cars can have a high environmental impact on soil and ground water, if not collected separately in a specially outfitted area and carried to the sewage system.

74. Avoidance of chemical drain cleaners (1,5 points) (New criterion)

Chemical drain cleaners shall not be used on the camp ground. Employees shall be educated regarding the use of mechanical means of drain cleaning.

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

Explanation:

Chemical drain cleaners are among the most toxic products in the detergent sector. There are many alternative means of liberating blocked drains, such as plungers, mechanical snakes and high pressure water jets.

75. Avoidance of artificial barbecue lighter (1 point) (New criterion)

Artificial barbecue lighting products shall not be sold in the camp site shops. Rape seed oil or hemp products may be used.

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

Explanation:

Chemical fire lighting products can have a heavy impact on water and soil. They are also very toxic if ingested accidentally and highly dangerous in areas at fire risk.

OTHER SERVICES**85. Camp site generated traffic (1 point) (New criterion)**

The camp site does not use motor vehicles for transport and maintenance on the camp ground.

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

Explanation:

The use of non-motorized or electrical vehicles for transport and maintenance on the camp ground helps to avoid consumption of fossil fuel and the generation of noise and exhaust fumes. It also sets a positive example and contributes to the environmentally friendly image of the camp site.

86. Handcarts for guests on the camp site (1 point) (New criterion)

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

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

Explanation:

Noise, exhaust fumes, danger for playing children and fuel consumption are the consequences of guests driving their vehicles on the camp ground in order to transport goods such as shopping, bathing or sports



equipment or luggage. This can be significantly reduced if the camp site puts at guests' disposal handcarts or similar means of transport.

87. Avoidance of sealing of the camp site surface (1 point) (New criterion)

At least 90% of the camp site 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 camp site fulfils this criterion, together with appropriate supporting documentation.

Explanation:

The sealing of surfaces causes soil depletion, and hinders proper drainage of rain which can lead in some case to flooding and geological disasters In order to offer guests clean, dry pitches, parking spaces and lanes, it is not necessary to cement or asphalt those areas. Possible alternative solutions are gravel, paving blocks with holes for grass or groundcover, brick, flagstone, quarry tile, wood planks, shredded bark and wood rounds.

88. Roof landscaping (1,5 points) (New criterion)

At least 50% of all suitable roofs (flat roofs or roofs with a small angle of inclination), on the campsite buildings are planted.

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

Explanation:

By means of planting the roofs, the sealing of landscape is reduced and valuable living space for micro organisms is created. Roof landscaping is a relatively easy method, which can be realised without professional help. It is best to use sedum plants because they do not require any further cultivation. It has to be clarified in advance, whether the roof is able to hold the extra weight.

89. Environmental communication and education (up to 3 points)

The camp site 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)

Explanation:

Score change based on specific evaluation of criterion in the framework of camp site service (see chapter 4)

91. Bicycles (1,5 points)

Explanation:

Score change based on specific evaluation of criterion in the framework of camp site service (see chapter 4)



4.2 Criteria evaluation

After the submission and comment of the 1st and 2nd Draft Criteria to the 2nd AHWG and the Presidential meeting of the Competent Bodies, the resulting 3rd Draft Criteria has been read and evaluated by a group of experts composed of consultants in the field of environmental management for camp sites, auditors and examiners for eco-labels and EMAS.

The viewpoints for evaluation are the same as those for the tourist accommodation label, in detail:

- Effective from an environmental point of view
- Not limiting consumer comfort
- Not discriminating to any applicant
- Easy to put into action
- Produces measurable results
- Permits an easy verification system (documentation, etc)
- Implies low costs for SME
- Possible elements of EMAS interaction
- Grade of presence in other European Eco-labels

The evaluation was carried out following the same 3-point scale already used for the evaluation of the environmental impact of the criteria, with 0 representing the impossibility to rate the criterion for various reasons, 1 a low, 2 a medium-high and 3 a very high applicability of the criterion to the issue at hand.

As can be observed in the following graphics of the evaluation results, the grading confirms the importance and justification of presence of the criteria in the draft, with the general media being that of 2, or medium high importance and applicability. Where the value is lower than 2, this is generally due to a conflict between costs for introduction of the criterion and its environmental impact, which may request further research.

The presence of and importance given to the criteria in other European Eco-labels will be analysed more into detail in chapter 5.



Table 4.1 Evaluation mandatory criteria 1

section	3rd Draft Criteria	Total Media	Effective from an environmental point of view	Not limiting consumer comfort	Not discriminating to any applicant	Easy to put into action	Produces measurable results	Permits an easy verification system (documentation, etc)	Implies low costs for SME	Possible elements of EMAS interaction	Grade of importance of this criterion where it is present in other labels	Total Score
MANDATORY CRITERIA												
energy	1. Electricity from renewable sources	2	3	3	2	2	2	2	0	0	2	16
energy	2. Coal and heavy oils	2	3	3	2	2	2	3	0	0	2	17
energy	3. Electricity for heating	2	3	3	2	2	2	2	1	0	1	16
energy	4. Boiler efficiency	3	3	3	3	3	3	3	3	0	3	24
energy	5. Air conditioning	2	3	3	3	2	2	2	2	0	2	19
energy	6. Window insulation	2	3	3	1	1	2	0	2	0	2	14
energy	7. Switching off heating or air conditioning	2	3	1	3	3	1	3	3	0	3	20
energy	8. Switching off lights	2	3	2	3	3	2	3	3	0	1	20
energy	9. Energy efficient light bulbs	2	3	3	3	2	3	2	3	0	2	21
water	10. Water source	2	3	3	2	2	3	3	3	0	1	20
water	11. Water flow from taps and showers	2	3	2	3	2	2	1	3	0	3	19
water	12. Water saving in sanitary areas and bathrooms	2	2	1	3	3	1	2	2	0	2	16
water	13. Waste bins in toilets	2	2	3	3	2	1	2	1	0	2	16
water	14. Urinal flushing	2	1	3	2	2	1	2	1	0	2	14
water	15. Leaks	2	2	3	3	2	1	1	2	0	2	16
water	16. Watering plants and outside areas	2	3	2	3	2	1	1	2	0	3	17
water	17. Waste water treatment	2	3	2	3	2	1	2	1	0	2	16
water	18. Waste water plan	2	3	3	3	2	1	2	0	0	0	14
chemical substances	19. Chemical toilet disposal points	2	3	2	3	2	1	2	0	0	2	15
chemical substances	20. Disinfectants	2	3	3	3	3	3	1	3	0	2	21
chemical substances	21. Staff training on detergent and disinfectant use	2	3	3	3	2	2	1	3	0	2	19
waste	22. Waste separation by guests	2	3	2	3	2	3	3	2	0	2	20
waste	23. Hazardous waste	1	3	3	3	2	1	1	0	0	0	13
waste	24. Waste separation by staff	2	3	3	3	1	1	1	2	0	3	17
waste	25. Waste transportation	2	3	3	3	1	1	2	0	0	2	15
waste	26. Disposable products	1	3	0	2	2	2	2	0	0	2	13
other services	27. No smoking in common indoor areas	1	1	2	1	2	2	2	0	0	2	12
other services	28. Public transportation	1	2	3	1	3	1	2	0	0	1	13
general manage	29. General maintenance and	2	2	3	2	2	0	1	0	3	2	15



Table 4.1 Evaluation mandatory criteria 1

section	3rd Draft Criteria	Total Media	Effective from an environmental point of view	Not limiting consumer comfort	Not discriminating to any applicant	Easy to put into action	Produces measurable results	Permits an easy verification system (documentation, etc)	Implies low costs for SME	Possible elements of EMAS interaction	Grade of importance of this criterion where it is present in other labels	Total Score
ment	servicing											
general management	30. Maintenance and servicing of boilers	2	3	3	3	2	2	2	3	0	2	20
general management	31. Policy setting and action program	2	0	3	3	2	1	3	0	3	2	17
general management	32. Staff training	2	2	3	2	2	1	2	2	3	2	19
general management	33. Information to guests	2	2	2	3	2	1	2	1	3	2	18
general management	34. Energy and water consumption data	2	1	3	2	3	0	3	2	3	3	20
general management	35. Other data collection	2	1	3	1	1	0	2	2	3	2	15
general management	36. Information appearing on the eco-label	2	1	3	3	3	0	3	0	2	1	16
OPTIONAL CRITERIA												
energy	37. Photovoltaic, local hydroelectric and wind generation of electricity	2	3	3	2	2	3	3	1	0	0	17
energy	38. Heating from renewable energy sources	2	3	3	2	2	3	3	2	0	0	18
energy	39. Boiler energy efficiency	2	3	3	1	2	3	3	2	0	0	17
energy	40. Boiler NOx emissions	2	3	3	1	2	3	1	2	0	0	15
energy	41. District heating	2	3	3	2	1	2	3	3	0	0	17
energy	42. Combined heat and power	2	3	3	1	1	3	3	3	0	0	17
energy	43. Heat pump	2	2	3	2	2	3	3	2	0	0	17
energy	44. Heat recovery	2	3	3	2	1	2	2	3	0	2	18
energy	45. Thermoregulation	2	2	3	3	2	2	2	2	0	2	18
energy	46. Insulation of existing buildings	2	3	3	3	2	2	1	2	0	2	18
energy	47. Air conditioning Class A energy efficiency	2	3	3	1	1	2	2	2	0	0	14
energy	48. Automatic switching-off of air conditioning	2	3	2	1	2	1	2	2	0	2	15
energy	49. Bioclimatic architecture	1	3	3	2	1	2	1	1	0	0	13
energy	50. Energy efficient equipment	2	3	3	2	2	1	1	3	0	2	17
energy	51. Electric hand and hair driers with proximity sensor	2	2	3	3	2	1	2	2	0	0	15
energy	52. Refrigerator positioning (1 point)	2	3	2	1	3	1	2	2	0	2	16



Table 4.1 Evaluation mandatory criteria 1

section	3rd Draft Criteria	Total Media	Effective from an environmental point of view	Not limiting consumer comfort	Not discriminating to any applicant	Easy to put into action	Produces measurable results	Permits an easy verification system (documentation, etc)	Implies low costs for SME	Possible elements of EMAS interaction	Grade of importance of this criterion where it is present in other labels	Total Score
energy	53. Automatic switching off lights in rental accommodation	2	3	2	1	2	2	2	2	0	2	16
energy	54. Sauna timer control	2	2	2	1	3	2	1	3	0	0	14
energy	55. Swimming pool heating with RES	2	3	2	1	2	3	3	2	0	0	16
energy	56. Automatic switching off outside lights	2	3	2	3	2	2	1	3	0	1	17
water	57. Use of rainwater and recycled water	2	3	2	2	2	3	2	2	0	2	18
water	58. Automatic watering systems for outside areas	2	2	2	2	2	2	1	2	0	2	15
water	59. Water flow from taps and shower heads	2	3	2	3	2	2	1	3	0	2	18
water	60. WC flushing	2	3	2	2	2	2	1	3	0	3	18
water	61. Dishwasher water consumption	2	3	3	3	2	2	2	3	0	2	20
water	62. Washing machine water consumption	2	3	3	3	2	2	2	3	0	0	18
water	63. Tap water temperature and flow	2	2	3	2	2	1	2	2	0	1	15
water	64. Shower timers	2	3	1	2	2	2	2	3	0	3	18
water	65. Swimming pool: cover at night	2	3	3	1	2	1	3	3	0	2	18
water	66. Avoidance of salt for icy roads	2	3	2	1	3	2	1	2	0	2	16
water	67. Indications on water hardness	2	2	3	3	3	1	2	1	0	2	17
water	68. Waterless urinals	2	3	2	3	2	2	2	3	0	0	17
water	69. Indigenous flora used for new outdoor planting	2	3	3	3	2	1	1	0	0	2	15
water	70. Changing towels and sheets	2	3	2	1	3	2	2	3	0	2	18
dangerous chemicals	71. Detergents	2	3	3	3	2	2	1	0	0	2	16
dangerous chemicals	72. Indoor paints and varnishes	2	3	3	3	2	2	1	0	0	1	15
dangerous chemicals	73. Car washing only in specially outfitted areas	2	3	2	2	3	1	1	0	0	2	14
dangerous chemicals	74. Avoidance of chemical drain cleaners	2	3	3	3	3	1	1	1	0	2	17
dangerous chemicals	76. Avoidance of artificial barbecue lighter	2	3	2	3	3	2	1	1	0	1	16



Table 4.1 Evaluation mandatory criteria 1

section	3rd Draft Criteria	Total Media	Effective from an environmental point of view	Not limiting consumer comfort	Not discriminating to any applicant	Easy to put into action	Produces measurable results	Permits an easy verification system (documentation, etc)	Implies low costs for SME	Possible elements of EMAS interaction	Grade of importance of this criterion where it is present in other labels	Total Score
dangerous chemicals	76. Dosage of swimming pool disinfectant	2	3	3	1	2	2	3	2	0	2	18
dangerous chemicals	77. Mechanical cleaning	2	3	3	3	2	2	1	3	0	3	20
dangerous chemicals	78. Organic gardening	1	3	2	1	2	1	1	1	0	2	13
waste	79. Composting	2	2	2	1	2	1	2	3	0	1	14
waste	80. Disposable drink cans	2	3	1	2	2	2	1	1	0	2	14
waste	81. Breakfast / food packaging and disposable goods	2	3	3	1	2	2	2	1	0	2	16
waste	82. Fat/oil disposal	1	3	3	1	2	1	1	1	0	0	12
waste	83. Used textiles and furniture	2	2	3	2	3	2	2	2	0	1	17
other services	84. Regulation of camp site traffic	2	2	2	3	2	1	1	1	0	2	14
other services	85. Camp site generated traffic	2	3	2	2	2	2	2	2	0	1	16
other services	86. Handcarts for guests on the camp site	2	2	3	3	3	1	2	1	0	0	15
other services	87. Avoidance of sealing of the camp site surface	1	3	1	2	1	2	1	1	0	0	11
other services	88. Roof landscaping	2	3	3	3	2	2	2	1	0	0	16
other services	89. Environmental communication and education	1	2	3	1	2	1	2	0	0	1	12
other services	90. No smoking in common areas and accomodation	1	1	2	2	2	1	2	1	0	2	13
other services	91. Bicycles	2	3	3	2	2	1	2	0	0	3	16
other services	92. Returnable or refillable bottles	2	3	3	2	2	2	2	1	0	2	17
other services	93. Paper products	2	3	2	2	2	2	1	1	0	1	14
other services	94. Durable goods	1	3	3	2	1	1	1	0	0	2	13
other services	95. Local food products	2	3	3	2	3	2	2	0	0	2	17
other services	96. Organic food	2	3	3	2	1	2	2	0	0	1	14
general management	89. EMAS registration or ISO 14001 certification) of the camp site	2	2	3	3	1	1	3	2	3	1	19
general management	98. EMAS registration or ISO certification of suppliers	2	2	3	1	1	1	3	1	3	2	17
general management	99. Energy and water meters	2	2	3	2	2	1	1	1	3	0	15



Table 4.1 Evaluation mandatory criteria 1

section	3rd Draft Criteria	Total Media	Effective from an environmental point of view	Not limiting consumer comfort	Not discriminating to any applicant	Easy to put into action	Produces measurable results	Permits an easy verification system (documentation, etc)	Implies low costs for SME	Possible elements of EMAS interaction	Grade of importance of this criterion where it is present in other labels	Total Score
general management	100. Additional environmental actions	0	0	0	0	0	0	0	0	0	0	0
general management	101. Eco-label award	2	2	2	1	2	1	3	1	2	0	14

Source: ACTA, ECOTRANS e ECOCAMPING Elaboration : ECOCAMPING and ACTA



4.3 Score system of the EU eco-label for camp site service

Introduction

As has been said from the First Activity Report and successively agreed upon in the First AHWG meeting for the development of the criteria for the camp site service, the criteria shall be divided into two levels of requirement: mandatory and optional.

This scheme is consistent with the scheme of the EU Eco-label on tourist accommodation and it is the most common criteria structure in existing national eco-labels on tourist accommodation. This scheme gives the Eco-label high flexibility and possibility to adapt to different situations, which is especially necessary when it has to be applicable in a wide territory such as Europe.

It is important to remember that when the product group is a service, as in this case, differently from when it is a good produced in a factory, the “use phase” is the main and most important phase as far as environmental impacts are concerned. The structure and nature of the criteria reflect this, including in management and measure criteria in the scheme, as well as being particularly interested in consumer perception of the criteria.

In the development of the structure and the score system of the criteria, consistency has been sought with the structure and scoring methodology applied to the Eco-label for tourist accommodation.

The following paragraphs describe the general features of the criteria, according to Regulation 1980/2000, their structure within the Eco-label scheme for this product group, and the score system.

4.3.1 *General features of the criteria*

The evaluation of criteria requirements and wording was conducted considering at each moment the features which are implied by the Regulation.

Environmental effectiveness. The Regulation states that criteria should act where they have most potential for reduction of negative environmental impacts.

Impact on consumer perception. The consumer going to an eco-labelled accommodation has certain expectations, which he needs to satisfy. It is important for him to see some signs of environmental commitment on the accommodation’s part.

Expression of EU environmental policy. The EU Eco-label is an instrument which, on a voluntary level, enables the EU to promote and implement its environmental policies. EU environmental policy together with scientific assessment, up to current knowledge, has been taken as main guideline for the justification of the criteria. Criteria expression of EU environmental policy was evaluated according to official EU documents.



Influence on the fitness for use of the product (in this case the service). Regulation 1980/2000 requires that the eco-labelled product shall be fit for use, which in this case means that it does not limit consumer comfort. Each criterion was evaluated in this.

Discrimination of applicants. The criteria may be discriminating if they require a certain guest behaviour which the accommodation manager cannot guarantee because it is beyond his control. Relying heavily on guest behaviour would be considered discriminating. It is important to note here that putting a sign asking the guest to behave in a certain way does not mean that the criterion is discriminating, because it is not requiring that the guest should do what he is invited to do; in this case the criterion asks the accommodation manager to do all that he can do to draw guests' attention to the issue stated by the criterion, and that's it. Data collection on such elements, which involve guest behaviour, shall be a measure of guest awareness and cooperation to environmental matters.

Technical feasibility. Criteria may be easy or difficult to implement. They were considered to have high technical feasibility when they did not require major construction works.

Economical feasibility. Criteria may be expensive to implement. Low investment and high investment were identified, where low investment is intended as less than €500 for a service or a long term good, and less than the same amount for a year supply (for an accommodation with 100 beds) for consumption goods. The economical feasibility of each criterion is based on information received from producers, from experts and from estimates. In all criteria except for the treatment of waste water in case there was not main sewage treatment, economical feasibility was a priority. After having discussed with experts and having read the water framework directive and Directives on waste, it should not be possible in our opinion, to award an accommodation whose water is dumped as such into the environment, due to the consequent environmental impacts and credibility.

4.3.2 *Level of requirement of the criteria and criteria profile*

The criteria have two levels of requirement; they can be mandatory or optional.

The mandatory criteria must all be fulfilled, if applicable. Mandatory criteria intend to guarantee the reduction of the main environmental impacts of the tourist accommodation service. The optional criteria take into consideration different possibilities depending on the regional, structural and infrastructural situation of the campsite service. In the next sections the structure of the criteria shall be explained in detail. The mandatory criteria are not scored, but they are mandatory inasmuch as they fulfil certain requirements linked to the Regulation 1980/2000 described above.

The optional criteria are scored, according to a system described in the next section, and a certain number of total points need to be reached by the camp site in order to obtain the EU eco-label. The methodology applied to the score system of the optional criteria is the same as that applied to the EU eco-label criteria for tourist accommodation service.



For clarity the mandatory and optional criteria are separated into two different sections: the first section lists the mandatory criteria, which must be fulfilled if applicable, and the second section lists the optional criteria, of which a certain number must be fulfilled in order to reach a set number of points. The number of points, which each criterion is worth, is reported next to the criterion.

Profile of the mandatory criteria

With respect to the above mentioned requirements a choice was made in order to establish the level of requirement (mandatory or optional).

The mandatory criteria were chosen for their high environmental effectiveness, a high expression of EU environmental policy, a high technical and economical feasibility and the production of measurable results. Consumer perception was considered as a valuable element for the mandatory criteria, such that if, given compliance to all other requirements, a particular criterion was not of the highest environmental effectiveness but had high impact on consumer perception, it would be mandatory. This was considered for a few main reasons. The first is that consumer perception is an important element auspicated by the Regulation and essential for the role of the eco-label in driving the market. The second is the scope of setting good examples for the consumer who may receive some positive inputs in favour of environmental respect which he may apply at home.

Table 4.2 describes the features of the mandatory criteria as described above.

Table 4.2 - Profile of EU mandatory criteria

Requirements for EU mandatory criteria								
POTENTIAL EU criteria	Environmental effectiveness	Has a high impact on consumer perception	Highly expresses EU policy	Keeps the product fit for use (does not limit consumer comfort)	Is not discriminating to any applicant (does not only depend on guest behaviour)	Has a high technical feasibility (easy to put into use)	Produces measurable results	Economical feasibility
Conditions for evaluation	1-5 1= low 5 = high	0 = no 1 = yes	0 = no (no documents regarding the aim of that criterion) 1 = yes (high priority for EU policy)	0= limits consumer comfort 1= does not limit consumer	0= discriminating 1 = not discriminating	0= no 1 = yes	0 = no 1 = yes	0 = high investment 1 = low investment
Mandatory	1 to 3	1	1	1	1	1	1	1
Mandatory	4 to 5		1	1	1	1	1	0

Legend of the above table:



Environmental effectiveness. In our study, when evaluating the environmental effectiveness of each criterion, a scale from 1 to 5 was used, where 1 is low effectiveness and 5 is high effectiveness.

Impact on consumer perception. In the evaluation of the impact on consumer perception a dichotomous variable was given two possible values, 0 for no or low impact, 1 for high impact (see further).

Expression of EU environmental policy. Criteria expression of EU environmental policy was evaluated according to official EU documents, and was given two possible values, 0 if EU environmental policy was not found and no particular official documents were found asserting and somehow quantifying its importance, 1 if such documents were found.

Influence on the fitness for use of the product (in this case the service). Each criterion was evaluated in this respect and was assigned 0 if it has a negative effect on consumer comfort, 1 if it did not.

Discrimination of applicants. Similarly to what presented above, each criterion was given a 0 if heavily relied on consumer behaviour, 1 if it did not.

Technical feasibility. If the criterion was considered to have a low technical feasibility it was given a 0, otherwise a 1.

Economical feasibility. If the criterion was considered to have a low economical feasibility it was given 0, otherwise 1.

Applicability of the mandatory criteria

All the mandatory criteria must be complied with, if applicable. If a criterion is considered not applicable, its inapplicability must be explained. Having included the clause “if applicable” makes the criteria not discriminating when they refer to a service not provided by the camp site, or when compliance with the criterion relies mainly on infrastructures of the destination and services provided by local authority.

For example, there is a criterion requiring that gardens be watered in the time of the coolest time of the day, if there is one, in order to minimize evaporation due to the heat, and save water (in addition to protecting plants). This criterion is not applicable if the camp site is located in such a site that any hour is quite equivalent in terms of temperature.

The correlation of the applicability of the criteria with the services provided by the local authority is seen, for example, in the criteria relating to waste separation or water management.. This link is an important feature of the EU criteria, and has the intent of relieving the accommodation manager of responsibilities which are not directly his (like ensuring an integrated separation, collection and disposal of waste, mainly through recycling) while highlighting his role as an environmentally aware and responsible consumer of local authority, who, by EU legislation, should ensure such services. In this sense, the EU eco-label intends to be an active instrument of implementation of European environmental policy.

The mandatory criteria require high performance in fields which are officially regulated by the EU environmental policy or which involve basic management procedures necessary for the implementation, organisation and verification of all other criteria. This is the reason why the mandatory criteria often refer to directives.

According to this system, to coherence with the existing EU Eco-Label on tourist accommodation service, and to previous AHWG meetings and discussions, criteria 1 – 36 of the Third Draft Criteria are mandatory.



SPECIFIC CRITERIA

Urinals

Discussion arose at the AHWG meeting in Brussels on 22 March 2004, on the possibility of the criterion on urinals to be taken out of the mandatory criteria. It appears that the environmental impact of urinals is not so high compared to the technical/economic feasibility, therefore the criterion could be removed from the mandatory criteria for the campsite service. The criterion shall remain for the tourist accommodation part of the Eco-Label.

Data Collection

Of some criteria, the significant environmental improvement is not immediate but potential. Such is the case with the data collection criteria. These criteria are mandatory in order to establish a first data base of consumption, since the lack of such information has been a drawback for the more limit-oriented development of the criteria.

It is also important for camp site manager motivation, to see the improvement in consumption of resources through the eco-label scheme.

Profile of the optional criteria: the score system

The optional criteria are scored. They give flexibility to the eco-label because they allow criteria which would be discriminating as mandatory criteria to become an opportunity as optional criteria. A sufficient number of optional criteria allows opportunities in different situations, and the result is a flexible, applicable eco-label.

The score to each optional criterion was assessed according to only three variables out of the ones stated above, which are the three main influencing the weight of the criterion (and consequently its score).

Table 4.3 reports the requirements from Table 4.2 that in the optional criteria are variable and which have been considered in the development of the score system.



Table 4.3 - Requirements for EU criteria and profiles of EU optional criteria

Requirements of EU optional criteria								
POTENTIAL EU criteria	Environmental effectiveness	Has a high impact on consumer perception	Highly expresses EU policy	Keeps the product fit for use does not limit consumer comfort)	Is not discriminating to any applicant (does not only depend on guest behaviour)	Has a high technical feasibility (easy to put into use)	Produces measurable results	Economical feasibility
Conditions for evaluation	1-5 1= low 5 = high	0 = no 1 = yes	0 = no (no documents regarding the aim of that criterion) 1 = yes (high priority for EU policy)	0= limits consumer comfort 1= does not limit consumer	0= discriminating 1 = not discriminating	0= no 1 = yes	0 = no 1 = yes	0 = high investment 1 = low investment
Optional criteria	*	*	1	1	having the choice whether to comply or not makes the criterion not discriminating	*	1	*

The features highlighted in colour were considered in the development of the score system of the optional criteria.

As can be seen, the expression of EU policy, the fitness for use and producing measurable results are constant, therefore they do not need to be considered in assigning the score. The discrimination of the optional criterion is not valid since the criterion is optional, therefore it does not need to be considered for the score. The remaining requirements are: environmental effectiveness, impact on consumer perception and technical/economical feasibility. These two requirements were put together as a single aspect.

It was now necessary to assign a range of values indicating the intensity with which each criterion fulfilled each requirement. For simplicity, the values were set as 1 or 2. As the last step, the requirements were weighed according to their importance in the essence of the criterion, as interpreted and estimated by the Regulation 1980/2000 and by the discussions among stakeholders of the AHWG meetings and to maintain consistency with the methodology used for tourist accommodation.

4.3.3 Weight of each element considered for score assignment

Each requirement considered has a different weight due to the different importance that it plays in the scope of the ecolabel, therefore the elements considered in the scoring system were weighted.



The weights were given as follows:

- Environmental effectiveness → 0,5
- Consumer perception → 0,1
- Technical/economical feasibility → 0,4

It is important to notice the presence of consumer perception as an element of evaluation of the score system. Since the eco-label is intended to be used as a marketing tool, consumer perception has an important role. For this reason, it was considered in the assignment of the score of the optional criteria, together with other elements.

The points assigned to each criterion varies from 1; 1,5; 2. The assignment of 3 points to criteria n. 97 (EMAS registration) n.100 and n.101 is political choice, since the criteria are expression of particular consciousness and effort for environmental involvement.

Table 4.4 summarises the framework for the assessment of score from 1 to 2 to optional criteria and it reports the possible combinations which could be attributed to each criterion, according to the value of intensity which could be assigned in each requirement considered.

Table 4.4 - Possible combinations which can be attributed to each criterion

Criteria	Environmental effectiveness 1 = less effective 2 = more effective	Weighted value for env. eff.	Consumer perception 1= low perception 2 = high perception	Weighted value for cons. percep.	Technical/economical feasibility 1 = low difficulty 2 = higher difficulty	Weighted value for tech/econ feasibility	Score of the criterion
	1	0,5	1	0,1	1	0,4	1
	1	0,5	2	0,2	1	0,4	1,1
	1	0,5	1	0,1	2	0,8	1,4
	1	0,5	2	0,2	2	0,8	1,5
	2	1	1	0,1	1	0,4	1,5
	2	1	2	0,2	1	0,4	1,6
	2	1	1	0,1	2	0,8	1,9
	2	1	2	0,2	2	0,8	2

The weights were assigned according to the analysis of EU environmental policy documents and existing eco-labels and expert evaluation. The possible values of intensity which were assigned to the criteria were 1 or 2.

It can be seen that evaluating the criteria according to a range of 2 values of intensity leads to a certain approximation, however it was not useful to apply a high sensitivity when it would have been lost in the following approximation for the assignment of scores from 1 to 2. It is our belief that this approximation does not reduce the methodological seriousness of the scoring of the criteria, and is absolutely necessary in order to maintain simplicity and easy understanding. For this reason, gradual performance was not considered, and the minimum performance needed to achieve



significant environmental results was adopted as the standard, keeping on mind the need to maintain flexibility for emergencies and gradual investments.

It can be seen from Table 4.4 that the criteria can have intermediate scores from 1 to 2. According to mathematical practices, the scores could be approximated to 1 or to 2. It can be seen that score 1 is achieved when environmental effectiveness is 1 and 2/3 of the values are low, and score 2 is achieved when environmental effectiveness is 2 and 2/3 of the values are high. The value 1,5 is achieved when the environmental effectiveness is low and the other two values are high, or when the environmental effectiveness is high and the other two values are low. This reflects the fact that environmental effectiveness has most weight in the scoring of the criteria.

To keep consistency with the existing EU Eco-label on tourist accommodation service, and to avoid any confusion or recalculation for who may have to switch from one Eco-label to another (between tourist accommodation and camp site service), there has been no change in score in the existing criteria. Such score has been developed according to the same methodology and has been agreed with during the previous criteria setting process.

Table 4.5 reports the additional criteria for the camp site service and their score.



Table 4.5 - Scoring system explicated for the additional criteria or criteria which have different scoring than in the existing Tourist accommodation Eco-label

	Environmental effectiveness 1 = less effective 2 = more effective	Weighted value for env. eff.	Consumer perception 1= low perception 2 = high perception	Weighted value for cons. percep.	Technical/economical feasibility 1 = low difficulty 2 = higher difficulty	Weighted value for tech/econ feasibility	Mathematical score of the criterion	Final score of the criterion
51. Electric hand and hair driers with proximity sensor (1 point)	1	0,5	2	0,2	1	0,4	1,1	1
54. Sauna timer control (1 point)	1	0,5	2	0,2	1	0,4	1,1	1
55. Swimming pool heating with RES (1.5 points)	2	1	2	0,2	1	0,4	1,6	1,5
56. Automatic switching off outside lights (1,5 points)	2	1	2	0,2	1	0,4	1,6	1,5
58. Automatic watering systems for outside areas (1 point)	1	0,5	1	0,1	1	0,4	1	1
64. Shower timers (1,5 points)	2	1	1	0,1	1	0,4	1,5	1,5
65. Swimming pool: cover at night (1 point)	1	0,5	2	0,2	1	0,4	1,1	1
68. Waterless urinals (1,5 point)	2	1	1	0,1	1	0,4	1,5	1,5
69. Indigenous flora used for new outdoor planting (1 point)	1	0,5	2	0,2	1	0,4	1,1	1
66. Avoidance of salt for icy roads (1 point)	1	0,5	1	0,1	1	0,4	1	1
67. Indications on water hardness (1 point)	1	0,5	2	0,2	1	0,4	1,1	1
70. Changing towels and sheets (1 point)	1	0,5	2	0,2	1	0,4	1,1	1
73. Car washing only in specially outfitted areas (1 point)	1	0,5	2	0,2	1	0,4	1,1	1
74. Avoidance of chemical drain cleaners (1,5 point)	2	1	1	0,1	1	0,4	1,5	1,5
75. Avoidance of artificial barbecue lighter (1 point)	1	0,5	1	0,1	1	0,4	1	1
78. Organic gardening (2 points)	2	1	1	0,1	2	0,8	1,9	2



	Environmental effectiveness 1 = less effective 2 = more effective	Weighted value for env. eff.	Consumer perception 1= low perception 2 = high perception	Weighted value for cons. percep.	Technical/economical feasibility 1 = low difficulty 2 = higher difficulty	Weighted value for tech/econ feasibility	Mathematical score of the criterion	Final score of the criterion
79. Composting (3 points)	2	1	1	0,1	1	0,4	1,5	1,5
82. Fat/oil disposal (3 points)	2	1	2	0,2	1	0,4	1,6	1,5
84. Regulation of camp site traffic(1 point)	1	0,5	2	0,2	1	0,4	1,1	1
85. Camp site generated traffic (1 point)	1	0,5	1	0,1	1	0,4	1	1
86. Handcarts for guests on the camp site (1 point)	1	0,5	2	0,2	1	0,4	1,1	1
87. Avoidance of sealing of the camp site surface (1 point)	1	0,5	1	0,1	1	0,4	1	1
88. Roof landscaping (1,5 points)	1	0,5	2	0,2	2	0,8	1,5	1,5
89. Environmental communication and education (3 points)	2	1	2	0,2	1	0,4	1,6	1,5
91. Bicycles (1,5 points)	2	1	2	0,2	1	0,4	1,6	1,5

Source: Elaboration data from ACTA

Criteria n.97, n.100 and n.101 are worth 3 points (out of scale) for political reasons since they highlight particular environmental involvement and dedication.



4.3.4 *Summarising the score given to each optional criteria reflects the potential to reduce negative environmental impacts, investment costs and consumer perception.*

The optional criteria require excellence in fields which are not always officially regulated by EU environmental policy but rather relate to particularly environmentally friendly technical and management measures which give significant improvement of environmental performance.

The attempt has been that of considering the main possible environmental measures on which criteria could have most significant influence. The number of optional criteria intends to allow flexibility to the scheme and give the accommodation a good number of options which consider regional and infrastructural differences. The fact that the applicant can choose which optional criteria to fulfil makes them non discriminatory.

The total number of points reached by the optional criteria is over 105 points divided in the following sections:

Energy: total number of points	32
Water: total number of points:	17,5
Chemicals: total number of points	12,5
Waste: total number of points:	12
Other services and elements (minimum):	24
Management (minimum) :	9,5
Total (minimum):	107,5

Not all optional criteria can be complied with at the same time. The total real score which can be reached is about 87 points (considering a camp site without a swimming pool, therefore not taking into consideration the points given to swimming pool management, and considering a camp site which has no ecolabel nor has put into action any additional environmental action).

In coherence with the tourist accommodation service, whereby the possible points were less and considering that to some criteria the points have been increased in virtue of the specificity of the camp site (laundry machine for guests, fat/oil disposal for guests, organic farming, composting), the total number of points required by the main camping site service is 20 points.

In coherence with the tourist accommodation score system, one additional point is required per each extra additional service among: food service, leisure activities and green areas.

The applicant shall comply with all of the mandatory criteria and shall fulfil as many optional criteria as needed to achieve the necessary amount of points per section as reported in Table 4.7 below.



Table 4.7 - Minimum score to be achieved in each section and minimum total score to be achieved by camp sites in order to be awarded the EU Eco-label

Min points to achieve per service provided	Total minimum score to be reached
lodging service ⁵⁶	20
food services	1 additional point
leisure activities	1 additional point
green areas	1 additional point

If the camp site service provides all three extra services is 23 points.

Since criteria n. 97, n.100 and 101 have not been taken into consideration for the total number of points which can be reached at the same time, they do not weigh in the computation of the 20 points minimum, thus not being discriminatory for those camp sites who do not comply with them.

⁵⁶ The product group “camp site service” shall comprise the provision, as a main service for a fee, of pitches equipped for mobile lodging structures within a defined area as well as other accommodation facilities suitable for the provision of shelter to lodgers and collective areas for communal services.



5 Comparative structure of the EU-flower for tourist accommodation and existing schemes

Introduction

As for the tourist accommodation label, other European Eco-labels have been compared and analysed in order to ascertain, if the structure and content of the EU-Flower criteria is synergic with that of the most important national hallmarks:

- *Austrian Eco-label (AT)*
- *Cataluna Eco-label (ES)*
- *Milieubarometer Eco-Label (NL)*
- *Clef Verte Eco-label (FR)*
- *Luxembourg Eco-Label (LUX)*
- *Latvia Eco-Label (LIT)*
- *Viabono Eco-Label (DE)*
- *Green Key Eco-label (DK)*

Chapter 4 of the 2nd Activity Report has already treated with the reasons for choice, and individual characteristics of those labels, describing their approach to minimizing the environmental impact of the areas and offer of camp site service.

At this point, in order to understand the grade of presence of the criteria of the 3rd Draft in the other labels, and the importance given to those criteria therein, a specific research has been carried out, first checking if the different labels contained an equivalent or similar criterion to each of those present in the 3rd Draft for the EU-Flower, and if this was the case, grading that criterion from 1 to 3.

On this scale, **1** represented a general, not specific equivalence (e.g. national label “water saving measures” towards EU-Flower label “the water flow of the taps and showers shall not exceed 10 litres/minute”), **2** a complete equivalence or very high similarity of criteria and **3** a higher specificity or severity of the criterion present in the national label than that of the EU-Flower (e.g. national label mandatory criterion “taps in washbasins, bidets and sinks must have a capacity of under 8 l/min for pressures of between 1 and 5 bars, or they must incorporate flow reducers which, once fitted to the sprinklers, give a flow of less than 8 l/min for the same pressure range” towards EU-Flower label mandatory criterion “the water flow of the taps and showers shall not exceed 10 litres/minute”)

Below, a graphic representation of the percentage of national labels where the specific criteria are present, and the average grade of importance given to them, where they appear.

The comments will give a short abstract of the most important issues, and relate them to the results of the general evaluation of the criteria (see chapter 4).

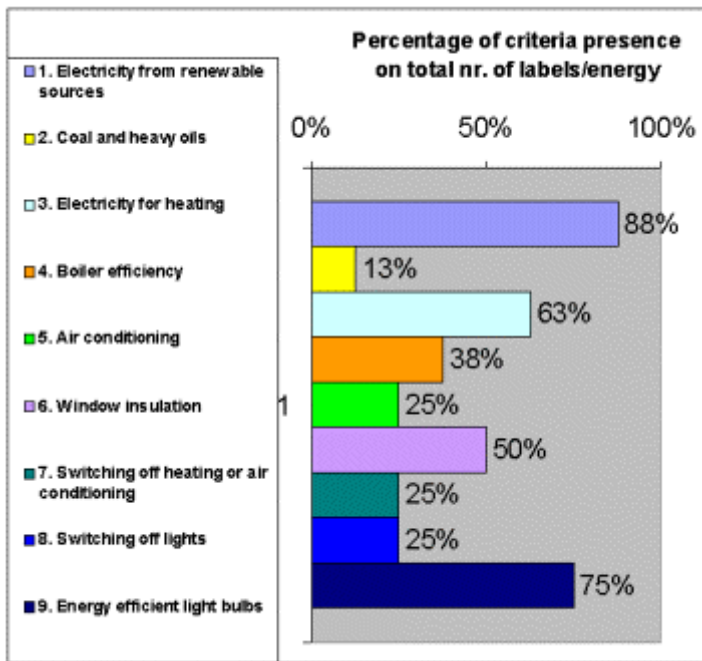


5.1 Mandatory criteria/ Energy

Alternative energy sources (cr.1 and 3) and energy saving lighting are present in most national labels. This is certainly due to the high potential of reducing environmental impact of the first, and operational costs of the second.

Where the importance given to the single criteria is concerned, where present, boiler efficiency and the switching off of air conditioning appear to be considered of very high impact, while the switching off of lights does not cover the same importance.

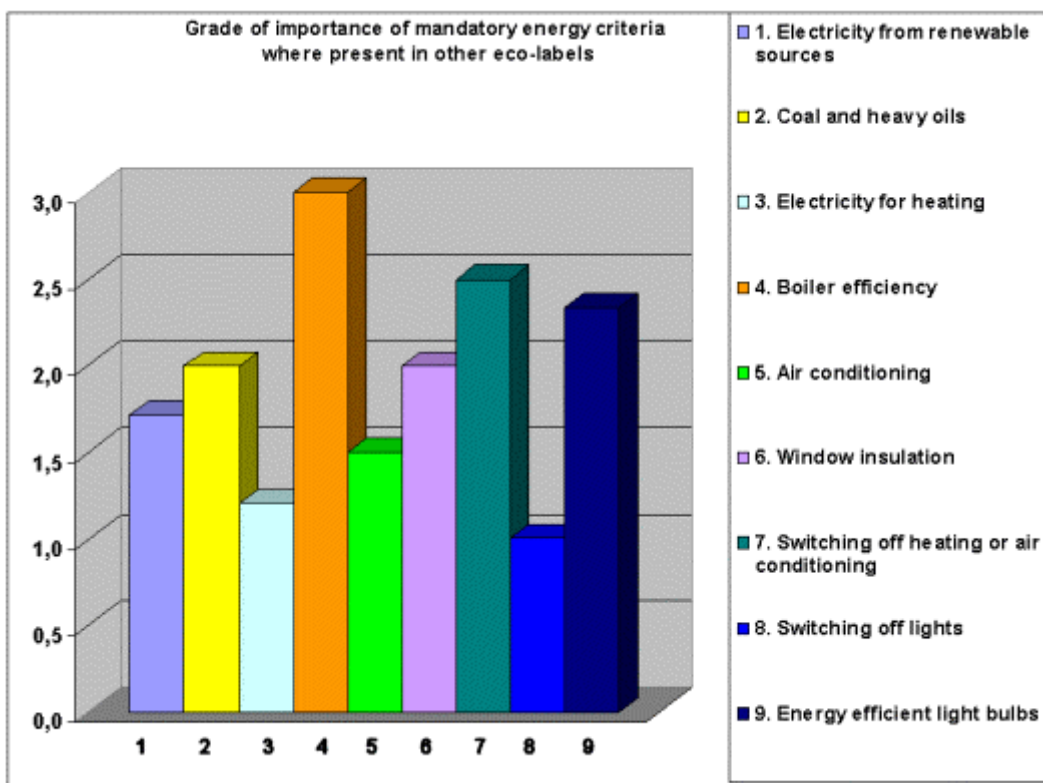
Graph 5.1 - Percentage of criteria presence on total number of labels/energy



Source: Elaboration data from ACTA



Graph 5.2 - Grade of importance of mandatory energy criteria where present in other eco-labels



Source: Elaboration data from ACTA

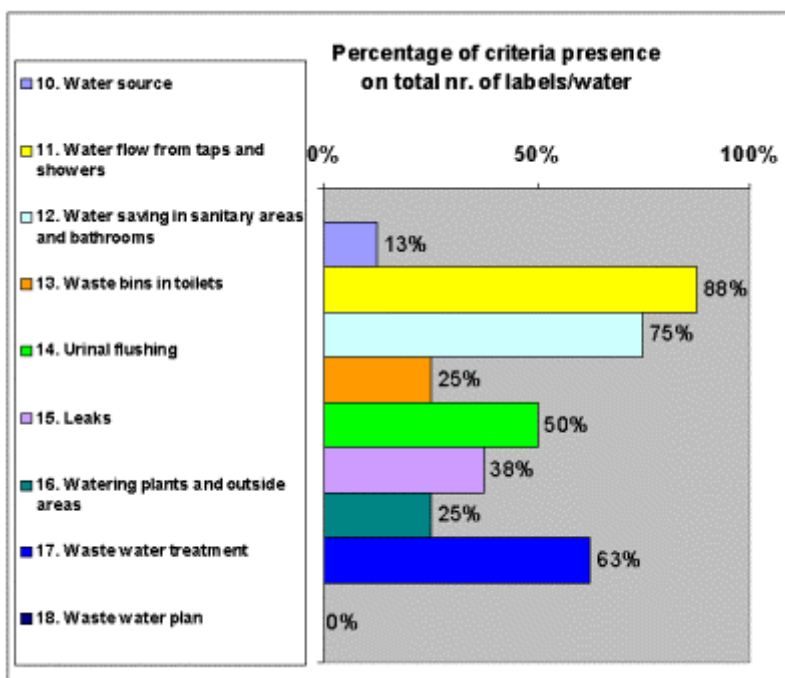
5.2 Mandatory criteria/Water

In most national labels, general criteria regarding the saving of water and the correct disposal of waste water are present. This involves principally the use of water saving technology for showers, WC and taps, reminding guests of responsible behaviour and ensuring the connection of the site to waste water treatment plants or the public sewage system.

Relatively simply to introduce measures like regular control for leaks or the controlled watering of outside areas, which from the expert evaluation (see chapter 4) appear of rather high impact and low cost, and pertinent to camp sites, are much less represented, as well as criteria regarding water management issues like an in-depth analysis and corresponding choice of water sources and waste water plans.

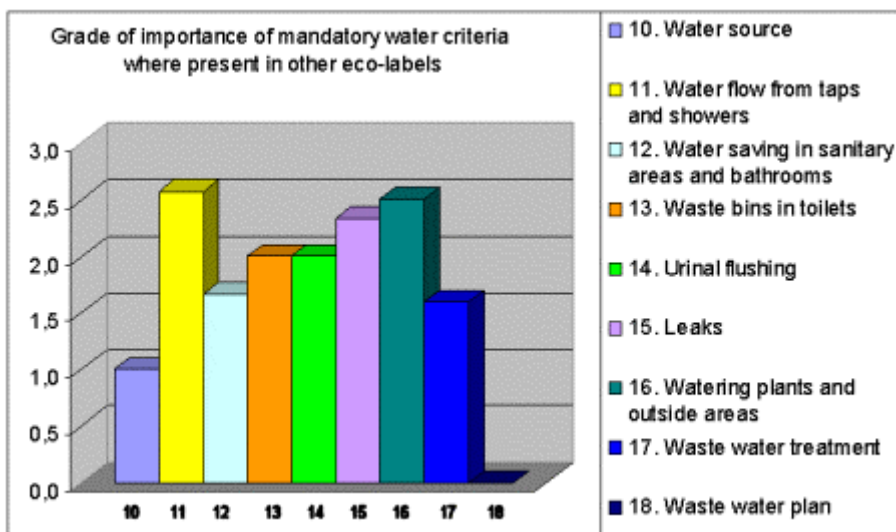


Graph 5.3 - Percentage of criteria presence on total number of labels/water



Source: Elaboration data from ACTA

Graph 5.4 - Grade of importance of mandatory water criteria where present in other eco-labels



Source: Elaboration data from ACTA

5.3 Mandatory criteria/Dangerous Chemicals

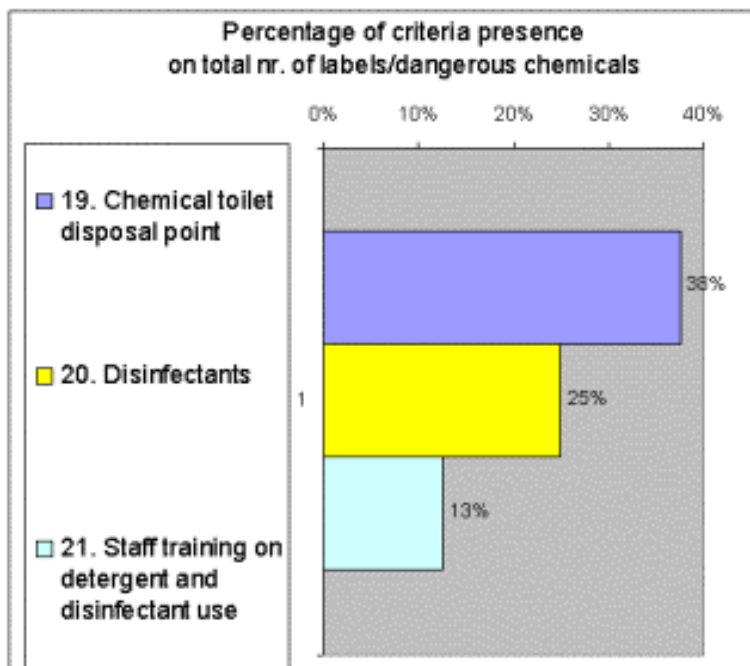
Regarding dangerous chemicals, there are no criteria with a strong presence in the national Eco-labels. Those most represented treat with the need of environmentally friendly disposal of the waste arising from chemical toilets, accounted for in a third of



the labels. A specific policy regarding the use of disinfectants results even less present, and staff training on this issue appears in only one label. Where present though, they are well defined and explained.

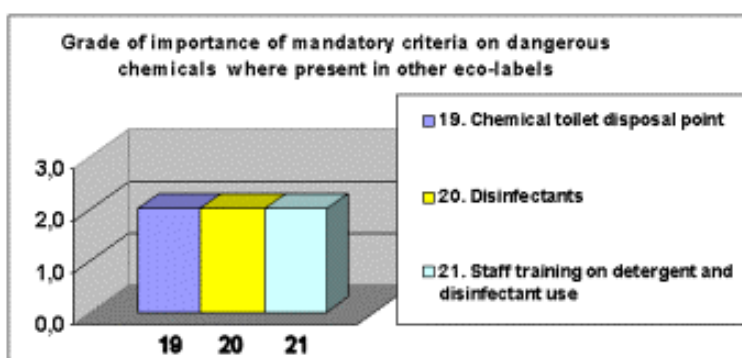
Considering the heavy negative environmental impact of those products, and the relatively easy introduction of measures to avoid their indiscriminate use (as resulting from the criteria evaluation in chapter 4), those criteria certainly deserve their position in the mandatory section of the EU-Label.

Graph 5.5 - Percentage of criteria presence on total number of labels/dangerous chemicals



Source: Elaboration data from ACTA

Graph 5.6 - Grade of importance of mandatory criteria on dangerous chemicals where present in other eco-labels



Source: Elaboration data from ACTA



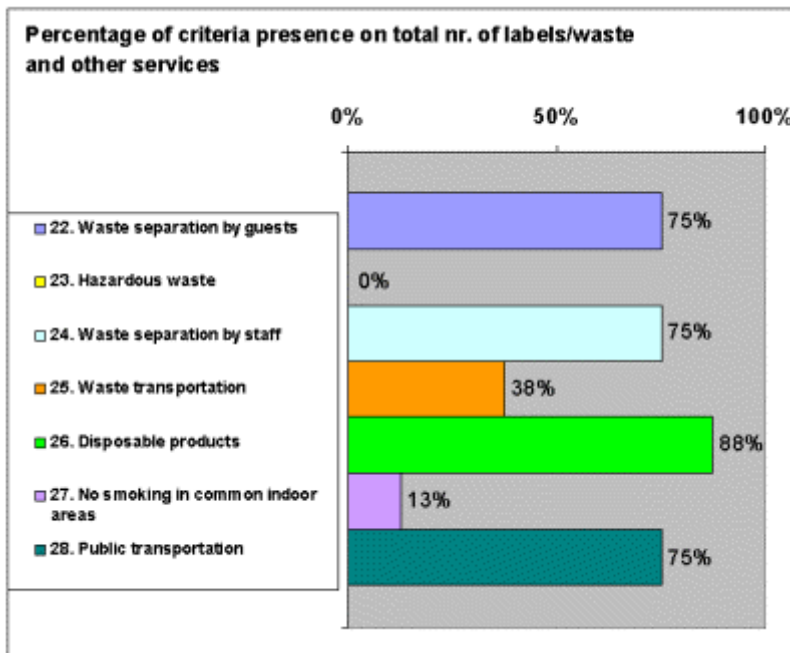
5.4 Mandatory criteria/Waste and other Services

In the area of waste and other services, a throughout waste separation and disposal policy is present in most national labels. The only area which is not considered appears to be that of hazardous waste, rather difficult to explain, given the high negative impact of the wrong actions in this field. The use and selling of disposable products also earns a place in most labels, but is not very clearly defined and regulated in most cases. Not specifically considered by most labels is also the necessity of transporting waste to an appropriate site where this is not done by the local authorities.

A non-smoking policy in common areas is required only by one of eight labels, rather astonishing, given the highly negative perception by guests of smoke-filled indoor areas.

A criterion regarding public transportation is present in most labels, offering relatively few specifications though, other than the display of schedules.

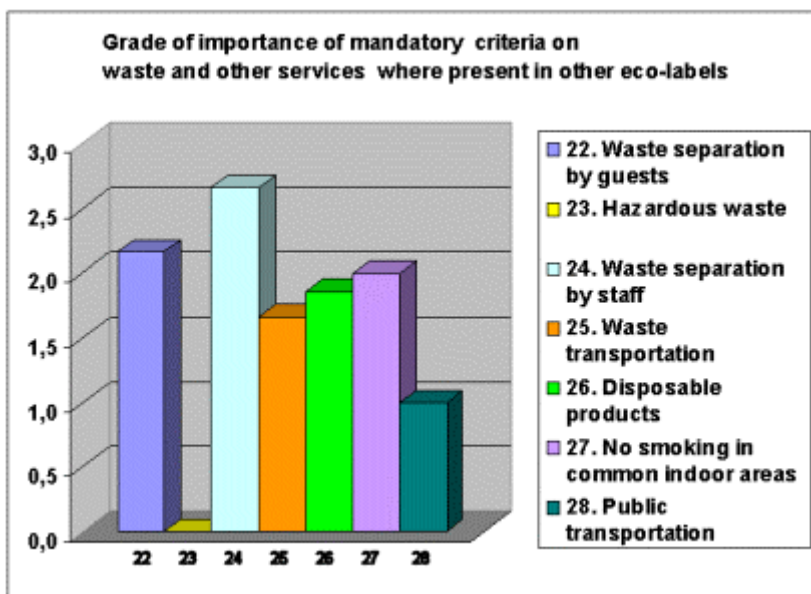
Graph 5.7 - Percentage of criteria presence on total number of labels/waste and other services



Source: Elaboration ACTA



Graph 5.8 - Grade of importance of mandatory criteria on waste and other services where present in other eco-labels



Source: Elaboration data from ACTA

5.5 Mandatory criteria/Management

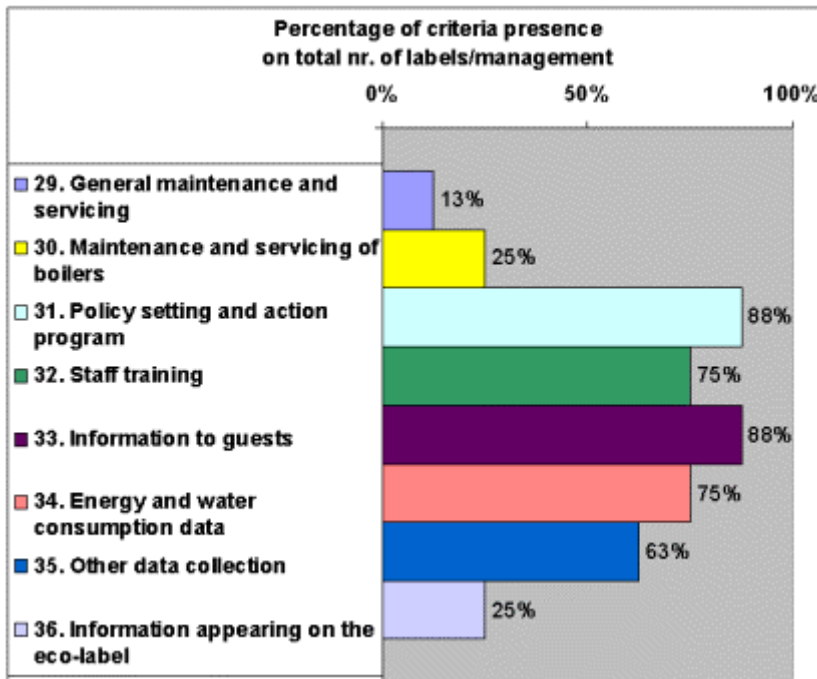
Clearly apparent in nearly all labels is the presence of a criterion regarding the necessity of a basic environmental policy, and information to guests on environmental issues, which are generally also well defined in the criteria wording.

Staff training and the collection of consumption data are also present in most labels, confirming the importance of the management sector as a basis for the introduction of effective environmental measures.

Very few labels however consider regular maintenance of equipment in general and boilers in particular important enough to include them in their criteria, astonishing in the view of the high negative environmental impact malfunctioning appliances may generate, in terms of acoustic and air pollution, energy and water consumption and reduced duration of the equipment itself.

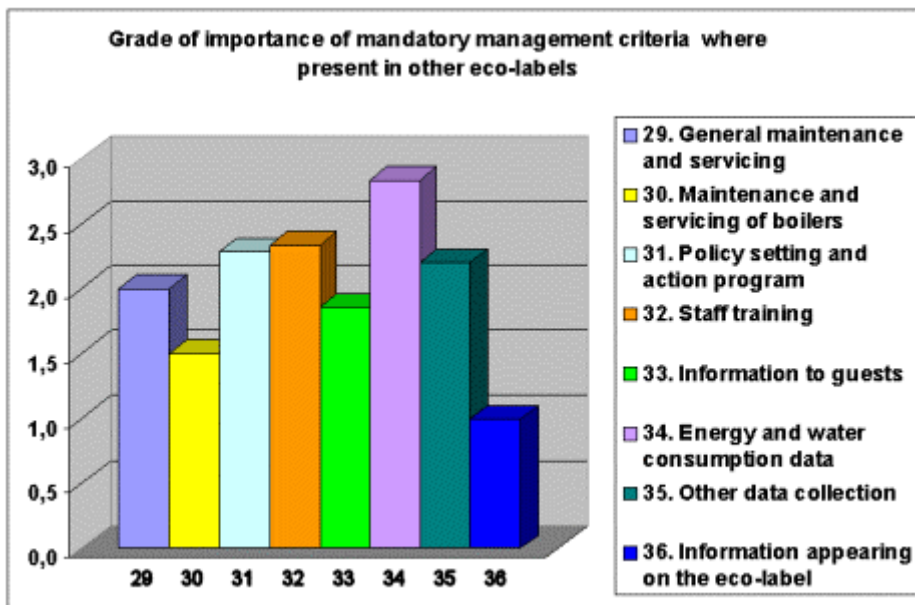


Graph 5.9 - Percentage of criteria presence on total number of labels/management



Source: Elaboration data from ACTA

Graph 5.10 - Grade of importance of mandatory management criteria where present in other eco-labels



Source: Elaboration data from ACTA



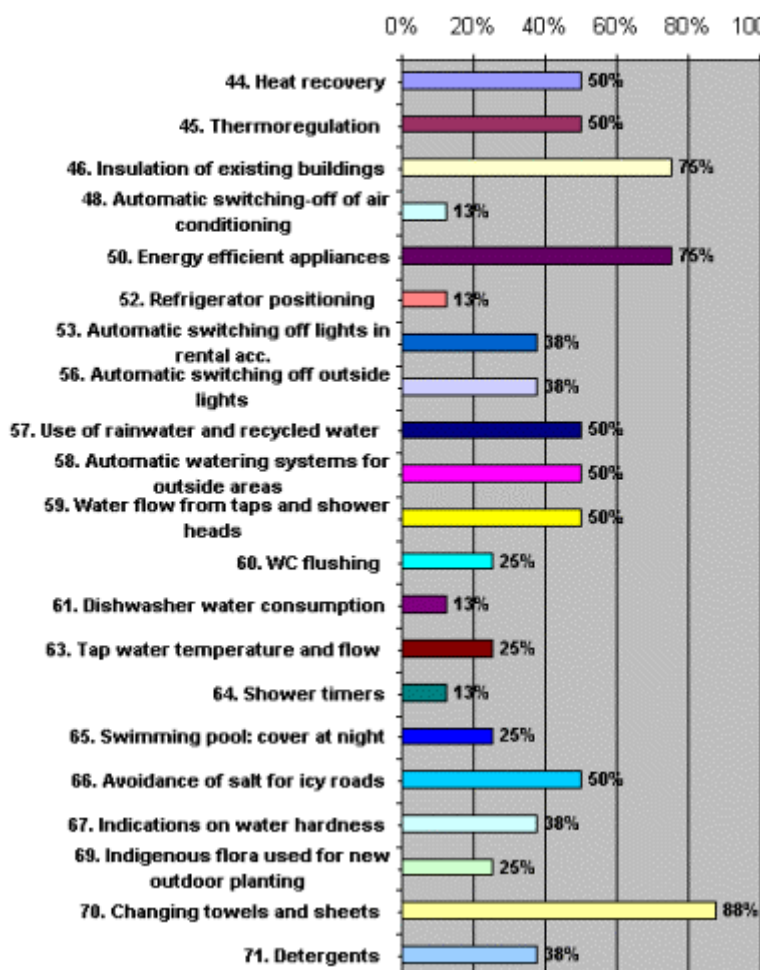
5.6 Optional criteria

The comparison of EU-Flower optional criteria with those present in national labels can be considered only as approximate, since most of those labels do not distinguish mandatory and optional criteria, and mostly comprise in one criterion issues which in the case of the EU-Flower are treated separately in different grades of specification and severity. Therefore many optional criteria regarding alternative energy, water saving, waste management and general management do not appear again in the list from which the above graphic is drawn.

Again, a rather surprising fact is the relatively scant presence of criteria related to the management of the outside areas, typical for camp sites, in most national labels. Few or no mention is made of correct watering, sealed surfaces, use of indigenous flora and similar issues, with the only exception of organic gardening.

Graph 5.11 - Percentage of presence of optional criteria in national labels

Percentage of presence of optional criteria in national labels

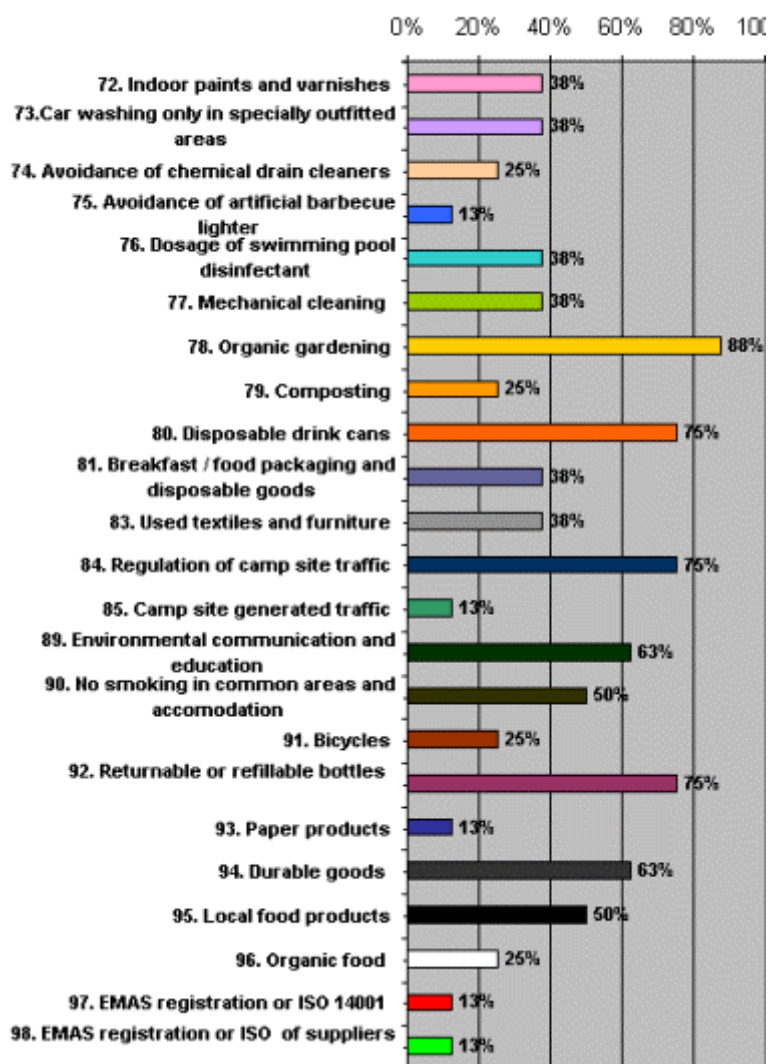


Source: Elaboration data from ACTA



Graph 5.12 - Percentage of presence of optional criteria in national labels

Percentage of presence of optional criteria in national labels



Source: Elaboration data from ACTA

5.7 Conclusions

From the analysis of the graphs, the main differences between the EU-Flower and the existing national and local eco-labels can be summarized as follows:

- the EU eco-label sets some limit and measure standards which are not necessarily required by the other eco-labels, which are mainly the result of complying with EU-directives and adapting to the latest results of research in the environmental field.



- as a result of their local position existing eco-labels can make more specific requirements in areas which may yield environmental and financial results without measurable problems in certain areas, while they would result limiting to customers or enterprises in others. For this reason criterion n. 101 promotes the adhesion to national and local eco-labels.

Both the EU and national eco-labels promote a certain standard in the field of environmental management (see here also chapter 6 on synergies with EMAS) and the use of other eco-labelled products and services.



6 Synergies with existing type I eco-labels, EMAS and ISO 14001

6.1 Synergies with existing Type I eco-labels

Article 11 of the Regulation specifically requires that existing schemes should be considered in the development of criteria.

In our case, existing eco-labels were considered in two ways. The first relates to the methodology of the initial consideration of the environmental impacts, which were identified from existing eco-labels. Always from a methodological point of view, the existing schemes were considered in the definition of the components of the EU eco-label. This has assured coherence and continuity between the EU Eco-label and existing schemes regarding the system boundaries and, consequently, the criteria.

In addition, the EU Eco-label recognizes existing schemes in the optional section in which there is a specific criterion that foresees points for those camp sites that have already an eco-label which complies with the standards ISO 14024 (type I eco-labelling).

The International Standards Organisation (ISO) have developed standards for three types of environmental product claims, termed ISO Type I, II and III. Type I (ISO 14024) claims are based on criteria set by a third party and are multi-issue, being based on the product's life cycle impacts. The awarding body may be either a governmental organisation or a private non-commercial entity. Examples include the EC Eco-label, Nordic Swan and German Blue Angel.

6.2 Synergies with EMAS and ISO 14001

The EU Eco-label has a General Management Section. The management criteria serve to plan and monitor the actions requested by the other criteria, setting priorities and expected results for future improvements in a co-ordinated framework of deadlines and measures.

This is a crucial aspect for improvement, in any field.

The management criteria present in the EU eco-label tackle in general the existence of an environmental policy of the camp site, which sets goals for its environmental behaviour, and an action plan, which sets a calendar for actions.

EMAS (Environmental management Audit Scheme) is the EU document instrument which requires all management steps towards continuous improvement and the management criteria of the EU eco-label have been developed so as to build synergies between the two instruments.



The main synergy is guaranteed by means of the recognition of the management criteria. In fact, camp sites which are certified with EMAS or ISO 14001 automatically fulfil all management criteria foreseen in the EU eco-label.

The following table shows the areas of similarities between the EU eco-label for camp site service and EMAS.

A	Environmental management system requirements	Third Draft Criteria EU-Ecolabel
I.A.1	General requirements	
	The organization shall establish and maintain an environmental management system, the requirements of which are described in this annex	
I.A.2	Environmental policy	
	Top management shall define the organisation's environmental policy and ensure that it (a) is appropriate to the nature, scale and environmental impacts of its activities, products and services; (b) includes a commitment to continual improvement and prevention of pollution; (c) includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which the organisation subscribes; (d) provides the framework for setting and reviewing environmental objectives and targets; (e) is documented, implemented and maintained and communicated to all employees; (f) is available to the public.	The management shall have an environmental policy and shall draw up a simple environmental policy statement and a precise action program to ensure the application of the environmental policy. The action program shall identify targets on environmental performance regarding energy, water, chemicals and waste which shall be set every two years, taking into consideration the optional criteria. It shall identify the person who will act as the environmental manager of the camp site and who is in charge of taking the necessary actions and reaching the targets. Comments and feedback from guests shall be invited and taken into account.
I.A.3	Planning	
I-A.3.1	Environmental aspects	
	The organisation shall establish and maintain (a) procedure(s) to identify the environmental aspects of its activities, products or services that it can control and over which it can be expected to have an influence, in order to determine those which have or can have significant impacts on the environment. The organisation shall ensure that the aspects related to these significant impacts are considered in setting its environmental objectives. The organisation shall keep this information up-to-date.	
I-A.3.2	Legal and o the requirements	
	The organisation shall establish and maintain a procedure to identify and have access to legal and other requirements to which the organisation subscribes, that are applicable to the environmental aspects of its activities, products or services.	
I-A.3.3	Objectives and targets	
	The organisation shall establish and maintain documented environmental objectives and targets, at each relevant function and level within the organisation. When establishing and reviewing its objectives, an organisation shall consider the legal and other requirements, its significant environmental aspects, its technological options and its financial, operational and business requirements, and the views of interested parties. The objectives and targets shall be consistent with the environmental policy, including the commitment to prevention of pollution.	



A	Environmental management system requirements	Third Draft Criteria EU-Ecolabel
I-A.3.4	Environmental management programme	
	<p>The organisation shall establish and maintain (a) programme(s) for achieving its objectives and targets. It shall include</p> <p>(a) designation of responsibility for achieving objectives and targets at each relevant function and level of the organisation;</p> <p>(b) the means and timeframe by which they are to be achieved.</p> <p>If a project relates to new developments and new or modified activities, products or services, programme(s) shall be amended where relevant to ensure that environmental management applies to such projects.</p>	<p>The camp site has a precise action plan to ensure the application of the environmental policy. Actions and responsible people are clearly identified and targets on environmental performance regarding energy, water, chemical and waste are fixed yearly-</p>
I-A.4	Implementation and operation	
I-A.4.1	Structure and responsibility	
	<p>Roles, responsibility and authorities shall be defined, documented and communicated in order to facilitate effective environmental management. Management shall provide resources essential to the implementation and control of the environmental management system. Resources include human resources and specialised skills, technology and financial resources.</p> <p>The organisation's top management shall appoint (a) specific management representative(s) who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority for</p> <p>(a) ensuring that environmental management system requirements are established, implemented and maintained in accordance with this International Standard;</p> <p>(b) reporting on the performance of the environmental management system to top management for review and as a basis for improvement of the environmental management system.</p>	
I-A.4.2	Training, awareness and competence	
	<p>The organisation shall identify training needs. It shall require that all personnel whose work may create a significant impact upon the environment, have received appropriate training. It shall establish and maintain procedures to make its employees or members at each relevant function and level aware of</p> <p>(a) the importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system;</p> <p>(b) the significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance;</p> <p>(c) their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the environmental management system, including emergency preparedness and response requirements;</p> <p>(d) the potential consequences of departure from specified operating procedures. Personnel performing the tasks which can cause significant environmental impacts shall be competent on the basis of appropriate education, training and/or experience.</p>	<p>The camp site shall provide information and training to the staff, including written procedures or manuals, to ensure the application of environmental measures and to raise awareness on environmentally friendly behaviour. Adequate training shall be provided to all new staff within four weeks of starting employment and for all staff at least once a year.</p>
I.A.4.3	Communication	



A	Environmental management system requirements	Third Draft Criteria EU-Ecolabel
	<p>With regard to its environmental aspects and environmental management system, the organisation shall establish and maintain procedures for (a) internal communication between the various levels and functions of the organisation; (b) receiving, documenting and responding to relevant communication from external interested parties. The organisation shall consider processes for external communication on its significant environmental aspects and record its decision.</p>	<p>The camp site shall provide information to the guests on its environmental policy, including safety aspects, the actions taken and the EU eco-label. Information shall be actively given to the guests at the reception, together with a questionnaire covering their views about the environmental aspects of the camp site. Notices inviting guests to support the environmental objectives shall be visible to the guests, especially in the common areas and the rental accommodation.</p>
I.A.4.4	Environmental management system documentation	
	<p>The organisation shall establish and maintain information, in paper or electronic form, to (a) describe the core elements of the management system and their interaction; (b) provide direction to related documentation.</p>	<p>The camp site shall have procedures to collect and monitor data on overall energy consumption (kWh), electricity and other energy sources consumption (kWh), and water consumption (litres). Data shall be collected with every bill received, or at least every three months, according to opening season, and shall also be expressed as consumption per overnight stay (and per m2 of indoor area). The camp site shall keep available the results for site inspections by the Competent Body that assessed the application. The camp site shall have procedures to collect and monitor data on consumption of chemicals (grams of dry substance) and the volume of waste produced (litres and/or kg of unsorted waste). Data shall be collected at least every six months, and shall also be expressed as consumption or production per overnight stay and (and per m2 of indoor area?). The camp site shall keep available the results for site inspections by the Competent Body that assessed the application.</p>
I.A.4.5	Document control	
	<p>The organization shall establish and maintain procedures for controlling all documents required by International Standard to ensure that a)they can be located; b)they are periodically reviewed, revised as necessary and approved for adequacy by authorised personnel; c)the current versions of relevant documents are available at all locations where operations essential to the effective functioning of the environmental management system are performed; d)obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use; e) any obsolete documents retained for legal and/or knowledge preservation purposes are suitable identified. Documentary shall be legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner and retained for a specified period. Procedures and responsibilities shall be established and maintained concerning the creation and modification of the various types of document.</p>	
I.A.4.6	Operation control	



A	Environmental management system requirements	Third Draft Criteria EU-Ecolabel
	<p>The organisation shall identify those operations and activities that are associated with the identified significant environmental aspects in line with its policy, objectives and targets. The organisation shall plan these activities, including maintenance, in order to ensure that they are carried out under specified conditions by (a) establishing and maintaining documented procedures to cover situations where their absence could lead to deviations from the environmental policy and the objectives and targets; (b) stipulating operating criteria in the procedures; (c) establishing and maintaining procedures related to the identifiable significant environmental aspects of goods and services used by the organisation and communicating relevant procedures and requirements to suppliers and contractors.</p>	<p>All equipment used to provide the camp site service shall be serviced and maintained in compliance with the law and when otherwise necessary, and the work shall be carried out by qualified personnel only. Of the equipment included in the criteria, the camp site manager shall have a written declaration from the technician on the frequency with which the law requires maintenance checks.</p>
	<p>Emergency preparedness and response</p>	
	<p>The organisation shall establish and maintain procedures to identify potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them. The organisation shall review and revise, where necessary, its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations. The organisation shall also periodically test such procedures where practicable.</p>	
I-A.5	<p>Checking and corrective action</p>	
I-A.5.1	<p>Monitoring and measurement</p>	
	<p>The organization shall establish and maintain documented procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that can have a significant impact on the environment. This shall include the recording of information to track performance, relevant operational controls and conformance with the organization's environmental objectives and targets. Monitoring equipment shall be calibrated and maintained and records of this process shall be retained according to the organization's procedures. The organization shall establish and maintain a documented procedure for periodically evaluating compliance with relevant environmental legislation and regulations.</p>	
I-A.5.2	<p>Non conformance and corrective and prevention action</p>	
	<p>The organization shall establish and maintain procedures for defining responsibility and authority for handling and investigating non conformance, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action.</p>	
I-A.5.3	<p>Records</p>	
	<p>The organization shall establish and maintain procedure for the identification, maintenance and disposition of environmental records. These records shall include training records and the results of audits and reviews. Environmental records shall be legible, identifiable and traceable to the activity, product or service involved. Environmental records shall be stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. Their retention times shall be established and recorded.</p>	
I-A.5.4	<p>Environmental management system audit</p>	



A	Environmental management system requirements	Third Draft Criteria EU-Ecolabel
	<p>The organisation shall establish and maintain (a) programme(s) and procedures for periodic environmental management system audits to be carried out, in order to (a) determine whether or not the environmental management system (1) conforms to planned arrangements for environmental management including the requirements of this International Standard; and (2) has been properly implemented and maintained; and (b) provide information on the results of audits to management</p> <p>The organisation's audit programme, including any schedule, shall be based on the environmental importance of the activity concerned and the results of previous audits. In order to be comprehensive, the audit procedures shall cover the audit scope, frequency and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results.</p>	
I-A.6	Management review	
	<p>The organisation's top management shall, at intervals that it determines, review the environmental management system, to ensure its continuing suitability, adequacy and effectiveness. The management review process shall ensure that the necessary information is collected to allow management to carry out this evaluation. This review shall be documented.</p> <p>The management review shall address the possible need for changes to policy, objectives and other elements of the environmental management system, in the light of environmental management system audit results, changing circumstances and the commitment to continual improvement.</p>	

As can be observed, the areas of planning, implementation, and monitoring and information/training are all covered by the management criteria of the EU eco-label, however, adoption of EMAS certification certainly goes into deeper detail and requires greater management performance.

The synergies can be summarized as follows:

1- camp sites which are certified with EMAS, automatically fulfil all management criteria of the EU eco-label.

2- camp sites which are certified with the EU flower have already implemented the first fundamental measures which are required for EMAS.

For this reason, criterion n. 97 and 98 recognises synergies between the two instruments and promotes the adhesion to EMAS by EU eco-labelled camp sites.



7 Communication to customers

Communication to customers is the set of actions and measures which concur to make the customer understand what the Eco-labelled camp site is doing to reduce the negative environmental impacts which any lodging service has on the environment.

In the communication to customer, two things need to be considered: direct and indirect communication.

7.1 Direct communication

Direct communication is the communication which the camp site structure gives to the customer on the aims of the eco-label. It is usually in the form of oral information at the reception or as information brochures to be found at the reception or in the bungalows and mobile homes. As is stated on the Regulation, this information should be precise and not misleading.

This is linked to raising awareness of the customer and the promotion of his environmentally friendly behaviour. The importance of direct communication is due to the fact that the EU eco-label intends to carry out its positive impacts on the environment through consumers' choice. Regulation 1980/2000 states that the eco-label should lead consumers toward products which are able to reduce the environmental impact in their entire life cycle.

Direct on site communication informs the customer of:

- the existence of an eco-label for camp site service,
- what the EU eco-label entails, its aims and measures,
- the fact that the accommodation which he has chosen is eco-labelled.

Direct communication usually has the immediate result of raising customer awareness and can lead to customer interest and appreciation. This has the consequence of raising lead and staff involvement and satisfaction, which should result in improved performances. This could be a reason for the camp site service to increase its fulfilment of criteria over the minimum.

Direct communication needs to be easy and intuitive, and it can clearly invite the customer to ask for further information. This may sensitise the customer in general on the EU flower all over Europe.

It has been very often said that the customer of a camp site does not want to and should not be asked to bear alone the "burden" of reducing the environmental impacts on the environment. For this very reason the EU eco-label has many limit criteria, which involve technical features of the components whose use is responsible for environmental impacts.

Making this known, for example, may ease guest willingness to do his part, as a member of an environmentally sound system.

The choice of the level of requirement of each criteria is very important for consumer



expectation of what he can find in the camp site. This is particularly true for components which the consumer uses directly, such as the presence of organic food, or of bicycles. It is therefore important, that the information material clearly states what is or is not mandatory and what the consumer may or may not expect.

In this sense, and as has shown the analysis of promoted services, environmental issues which are tackled by the criteria in the Third Draft, are used to promote the camp site.

Furthermore, as should be auspicated, it may bring him to adopt an environmentally friendly attitude at home, as a consequence of correct and interesting information, and choose eco-labelled products afterwards.

7.2 Indirect communication

Indirect communication to the customer on the EU eco-label is the communication which the customer receives through what he sees inside the eco-labelled camp site. It is important for consumer perception that he understands the initiatives and measures in relation to the adhesion of the camp site to an environmental label.

Indirect communication is carried out also through the attitude of management and staff toward criteria requirement.

A correct communication plan is an important part of the management plan of environmental performance of the camp site, and shall be tackled in depth in the User Manual.

7.3 Customer opinion on environmental issues on camp sites: results of customer surveys

Generally, the introduction of environmental management and measures on camp sites, other than on reasons of cutting costs, has often been based on the assumption that campers are naturally inclined towards forms of tourism related to nature and open air, and as such, themselves highly environmentally conscious and ready and happy to accept any initiative aimed at lowering environmental impact of their holiday, even if this may entail slightly higher costs, less comfort and/or extra effort.

In the framework of the LIFE-Project ECOCAMPING and its follow-up activities, there have been several surveys carried out, with the objective to ascertain the true attitude of camp site guests towards environmental initiatives, their expectations thereof and the main environmental issues they wish to see addressed or feel less comfortable with.

Following, an overview on some of those researches.

Survey Nr.1 took place in August 2000 on 13 camp sites around the Lake Constance (Germany, Austria and Switzerland).

Survey Nr.2 was carried out in October 2000 during the “Caravan”-fair in Düsseldorf (Germany), an event specialized in camping equipment and information.

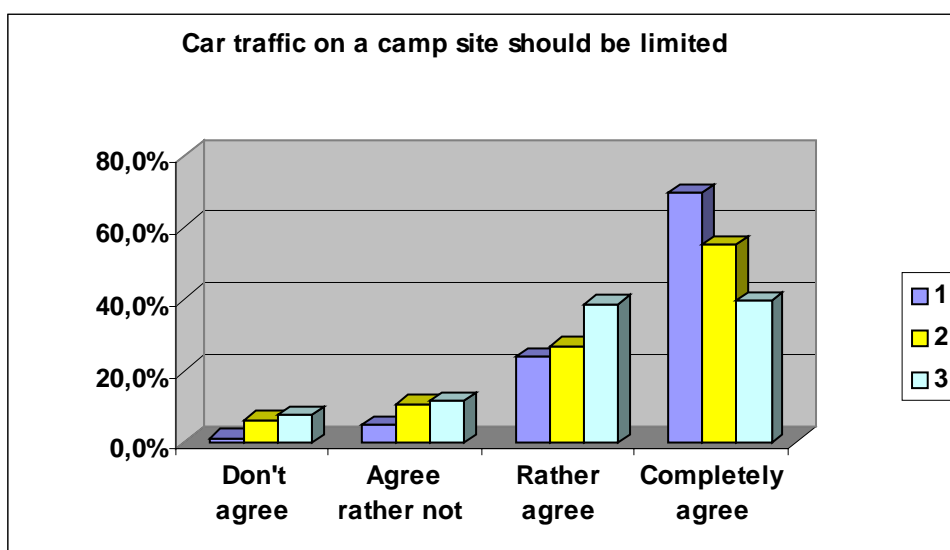
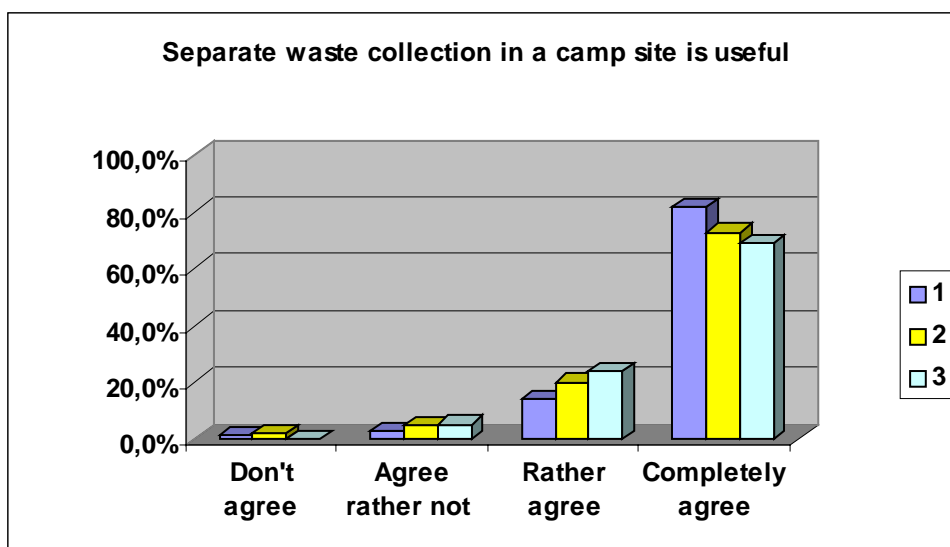
Survey Nr. 3 took place in August 2001 on 10 camp sites around the Lake Constance and 3 in the Black Forrest (Germany).

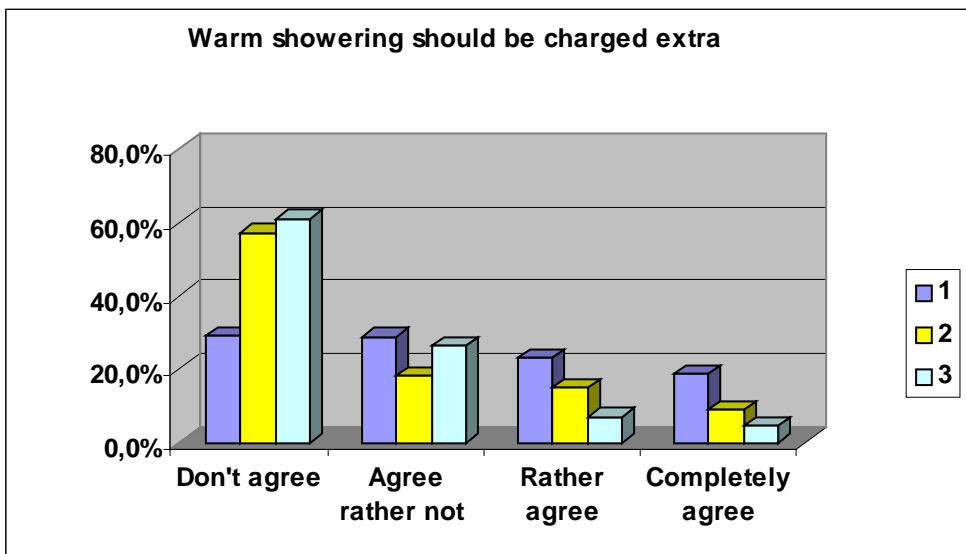
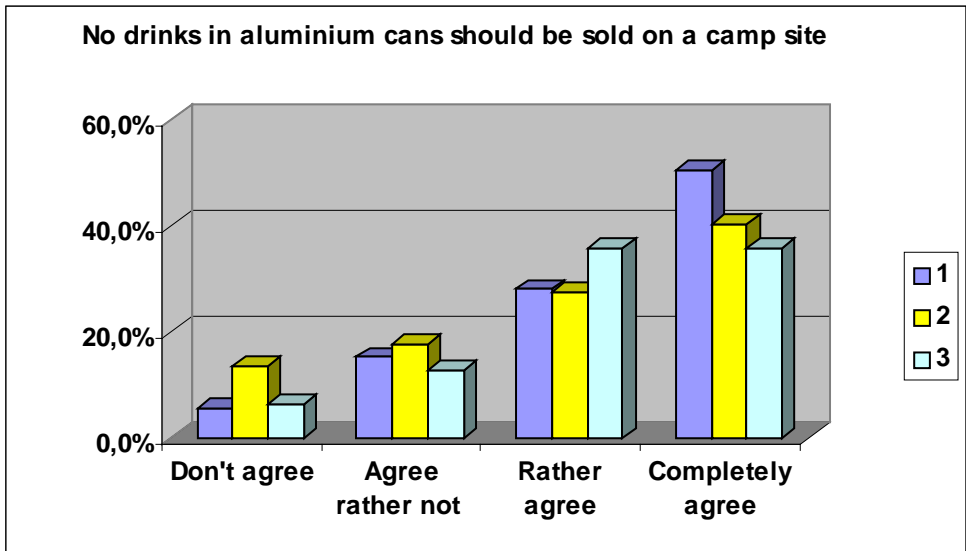
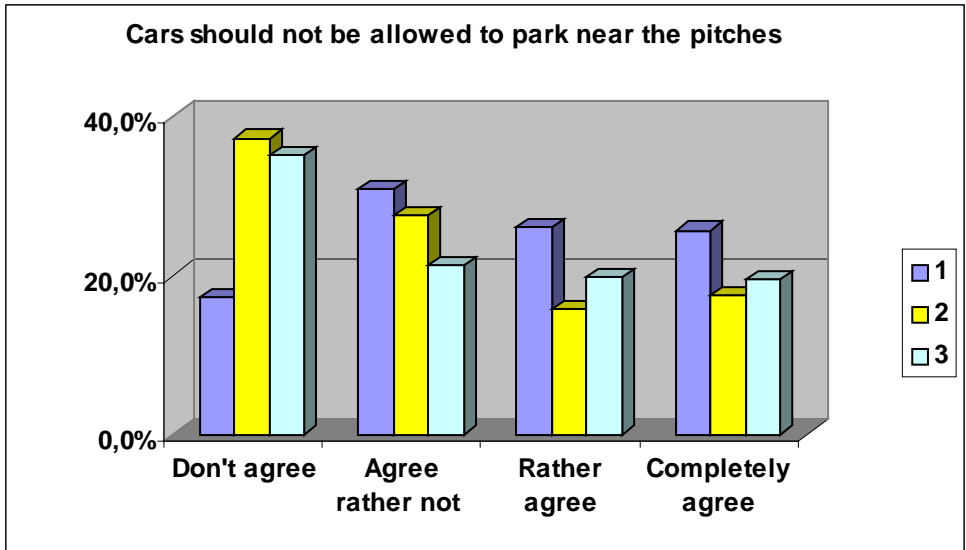


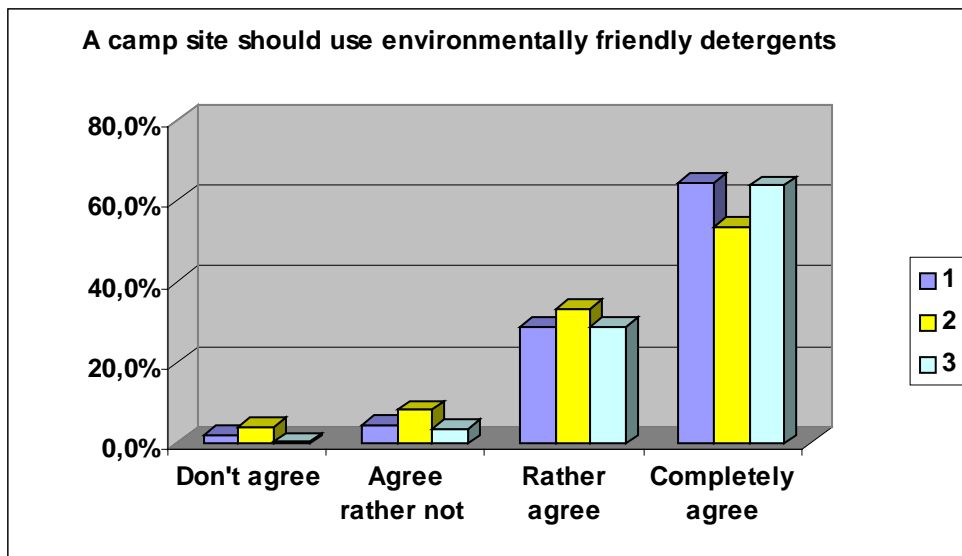
Nr. survey	Valid interviews	Less than 20 years old	20-30	30-45	45-60	More than 60 years old
1	606	13,70%	9,70%	40,10%	21,10%	10,60%
2	588	7,90%	12%	48,10%	25,70%	6,20%
3	462	10,80%	7,30%	48,00%	25,10%	8,80%

The administered questionnaire contained several parts regarding the general interests and requests of camping guests, and, in particular, specific questions on the reception of some environmental measures.

Below, some sample data from the three surveys.

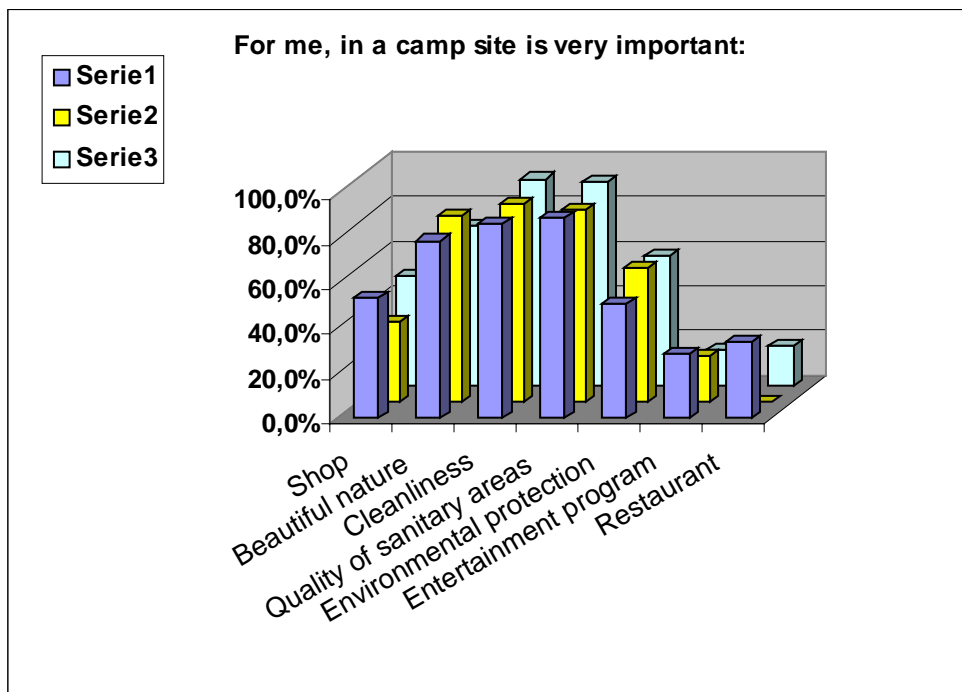






These results, and the comments to other parts of the surveys show clearly, that camping guests generally agree to an environmentally oriented management of the site.

Intact nature and environmental protection of the surroundings are generally considered on the same level as the quality and hygiene of the sanitary areas, and even more important than the presence of a restaurant.



Data Source: ECOCAMPING Elaboration: Acta

Rather predictably, the acceptance is more positive on measures, which tend not to limit comfort and avoid to request personal effort. So, anything the camp site can do to restrict environmental impact will be well regarded and praised, as long as it does not significantly raise the cost of the stay and/or request exertion, like paying for hot showers or walking from a car parked outside the camp site to the pitch.

Particularly appreciated are measures, which reduce noise and air pollution, and supplement (but not totally substitute) products and services already on offer with an environmentally friendly choice, such as limitations in traffic hours or sale of organic and regional food.

More than 75% of the interviewed affirmed that they would prefer a camp site with an Eco-label to one without. The question, if this would also be the case if the labelled site had higher costs has not been raised in the framework of these surveys, but other data from general tourism surveys in Germany show that about 15% of campers could imagine paying slightly more for certified environmental quality.

Another important element, which transpired clearly during the surveys, was the interest and eagerness of guests to comment on, and eventually contribute ideas to environmental management issues. For any type of environmental management and classification therefore the inclusion of guests' opinions in the planning and implementation of measures and initiatives appears fundamental.

The decision to include the questionnaire asking for guest feedback in the mandatory section of the EU-Flower label (criterion 33) receives further corroboration from this.



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