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

TOURIST ACCOMMODATION
EU ECO-LABEL AWARD SCHEME

EU Eco-Label

FINAL REPORT

16 OCTOBER 2002

EXECUTIVE SUMMARY

Eco-labelling is a voluntary instrument of implementation of high environmental performance in order to reduce consumption and acquire visibility to a sensitive market. One of the scopes of eco-labelling is to reduce the environmental impacts of goods and services through the promotion of market driven environmentally friendly products.
As an instrument of implementation of European environmental policies, the criteria were developed coherently with these policies.
The development of ecological criteria for the EU award scheme for the product group *tourist accommodation* is the first service product group. This novelty has required particular care in the definition of the product group and in the identification of the elements included in the system boundaries in the order to fulfil the Regulation requirements for a product group, namely, to include the maximum volume of internal sales within each country, to be equivalent in use and consumer perception and to allow the criteria to have most significant influence in reducing the negative environmental impacts in all its life cycle.

Two approaches were considered for the definition of the product group: the structure-oriented approach and the service-oriented approach. The scenarios which emerged from the two approaches were examined. The structure oriented approach considered all services specific to a chosen tourist accommodation structure, for example hotels, or Bed and Breakfast, or farmhouses. The service-oriented approach considered the service tourist accommodation, identified in its elements essential to the tourist accommodation service common to all structures, therefore extending the EU eco-label to all tourist structures providing a tourist accommodation service.

A detailed analysis of the tourist offer and of the market showed that tourist accommodation is varied and is moving towards different structures, therefore the service oriented approach would allow greater flexibility to changing structures. A deep analysis of the legislation and of the services offered in the most complex type of accommodation structure, the hotel, allowed the definition of product group and the identification of its system boundaries as follows, the tourist accommodation service was identified as the **provision of sheltered overnight stay in accommodation with appropriately equipped rooms, including at least a bed, offered as a main service to tourists[1] travellers and lodgers for a fee.** Within the system boundaries of this definition, are included activities related to the front office (reception), to the back office (administration, staff), to common rooms and, of course to the private guest room.

The analysis of the environmental impacts of the product group defined as stated above confirmed the coherence of the definition with the Regulation requirements.

The criteria were developed in view of this definition, without, however, excluding elements which had significant effects on consumer perception and on the overall image of the EU eco-label. According to the environmental impacts identified within the product group analysis and to EU environmental policy, it was identified that the criteria would be mainly aimed at:

- reducing the quantity of energy used
- reducing the quantity water used
- reducing the quantity of chemicals used
- reducing the quantity of waste produced

and also be aimed at:

- improving the quality of the energy used

[1] The official definition of tourist, according to the World Tourism Organization is: any person who travels from his usual place of residence where he earns the major part of his income, for at least 24 hours (which includes an overnight stay)t and for less than one year.

- improving the quality of the water used
- improving the quality of the chemical substances used
- improving the quality of the waste produced

In particular, improving the quality of the energy used means to promote the use of renewable resources of energy, improving the quality of water means to promote the use of less treated water when possible, because treatment implies the use of chemicals having negative impacts on the environment, improving the quality of chemicals means to avoid the use of some substances which are particularly hazardous, and improving the quality of waste means to separate waste as much as possible.
In addition to the four main areas listed above, there are other general environmental objectives which include:

- Raising the awareness and promoting the environmentally friendly behaviour of staff and guests.

- Collecting data in order to create a data base on effective consumption, inexistent up to today, for future criteria development.

- Promoting synergies with the EMAS regulation for continuous improvement in the environmental quality of the service provided.

The criteria scheme includes both mandatory and optional criteria. 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 must be complied with according to a score system purposely developed in order to reach a certain score. The optional criteria take into consideration different possibilities depending on the regional, structural and infrastructural situation of the tourist accommodation in the European territory. The mandatory criteria refer as far as possible to EU environmental policy legislation, requiring high performance with respect to legislative standard ranges. Some criteria reach excellence going beyond standards and showing special commitment to environmental measures of the accommodation lead and staff.

The criteria scheme, in all its parts, from criteria requirement to verification procedures and fee system take into close consideration the very high percentage of micro enterprises which run tourist accommodation services.

The development of future criteria has been considered, aware of the fact that not all issues could be covered this time, due to lack of comparable and reliable information on many issues, especially on effective consumption values for energy, water, chemical and waste production. In order to allow the development of criteria on effective consumption, the present criteria aim at gathering the necessary information.

Sinergies within the application of the criteria are foreseen for environmental management systems certified by Emas or ISO 14001 and for existing Type I eco-labelling initiatives.
The criteria also aim to promote the consumption of other EU Eco-label product groups and take into consideration existing voluntary measures in order to generally promote European environmental performance.

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METHODOLOGY OF RESEARCH AND CRITERIA DEVELOPMENT ACCORDING TO REGULATION 1980/2000

1 Introduction

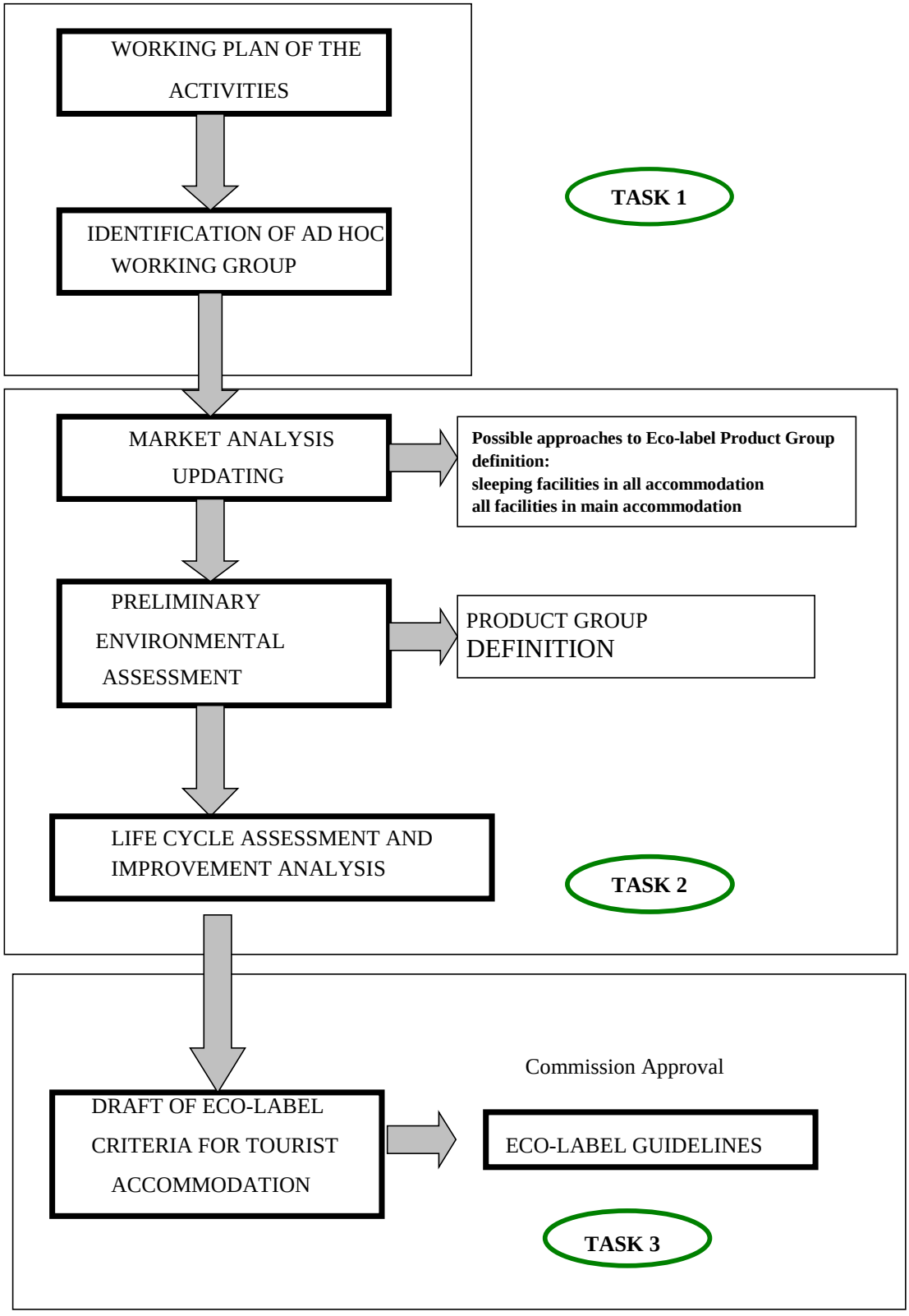
For the first time, with the development of ecological criteria for tourist accommodation, the Community eco-label (EU eco-label) has tackled a service product group. In new Regulation 1980/2000, a revision of the old version 880/92, "product" is defined as "any good or service", thereby enabling the product group of the criteria to include services.

The EU eco-label is a Type I eco-label, and the process of product group definition and criteria development was carried out according to the Regulation requirements as stated in Annex IV.

An Ad Hoc Working Group (AHWG) was constituted, whereby the stakeholders could follow the development of the criteria and give their feed back on the work conducted within transparency and confidentiality. The outcome of discussions with interested parties in the course of the AHWG meetings and subsequent exchange of opinions and information was always considered.

In developing the criteria for the EU eco-label on tourist accommodation it was always kept in mind the fact that the eco-label is one of the instruments of the European Union to promote environmental measures according to the Community environmental policies. For this reason, European Directives and inclinations as stated in official EU documents were adopted as the starting point for both the existence of a criterion and for its content. In addition, the intent of the Regulation regarding the aim of the criteria was respected, therefore, as stated by Article 1 and art.3 of the Regulation, the product group was chosen in order that the criteria could have most effect in reducing negative environmental impacts, and the system boundaries of the product group were identified accordingly.

In the picture below are reported the steps which were conducted for the development of a draft Commission Decision for the award of the European Eco-label to the product group tourist accommodation.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2 Definition of the product group

2.1 EU Regulation essential requirements for the product group

According the Article 1 of the Regulation, the scope of the EU eco-label is "*to promote products which have the potential to reduce negative environmental impacts, as compared with the other products in the same product group, thus contributing to the efficient use of resources and a high level of environmental protection. This objective shall be pursued through the provision of guidance and accurate, non-deceptive and scientifically based information to consumers on such products"*. It is therefore very important to define the product group of the criteria.

This requires a market study, institutional definitions, life cycle considerations of the possible environmental impacts and any other related analyses of the product in order to assess the definition of the *product group* which best fulfils the Regulation requirements.

Therefore, as a first step, the product group definition of "tourist accommodation" was tackled according to the requirements of the Regulation, ascertaining that the system boundaries of the product group, as defined, would include the maximum volume of internal sales within each country, would be equivalent in use and consumer perception and would allow the criteria to have most significant influence in reducing the negative environmental impacts in all the life cycle of the "tourist accommodation" service, as stated in Art.2 of the Regulation.

Two major approaches were presented as possible product groups: the service oriented approach and the structure oriented approach. The first approach considered the service supplied within the tourist accommodation, independently of the type of accommodation structure, while the second approach put a focus on the specific type of accommodation structure, for example hotels or farmhouses, or Bed and Breakfast, etc, one excluding the other.

Life cycle of a service

As stated above, the environmental impacts of the product group must be considered according to a life cycle approach. It is fundamental to remember that both the service-oriented and the structure-oriented approach describe the service tourist accommodation, which is the object of the EU Eco-label environmental criteria scheme. The life cycle of a service, and in particular of the tourist accommodation service consists of the following phases:

1. the provision of the service phase
2. the use phase
3. the waste management phase.

These phases shall be discussed in greater detail further on in this chapter.

In accordance with the Fematour[2] study, the phases of building and demolishing the accommodation structure were not taken into consideration specifically. Building the accommodation structure may have very high environmental impacts, but the scope of this award scheme is to take into

[2] CREM, Feasibility and market study for European Eco-label for tourist accommodation (FEMATOUR) commissioned by the European Commission, DG – ENV Amsterdam, August 2000. CREM Project n. 00.4002. http://europa.eu.int/comm/environment/eco-label/pdf/market_study/fematour.pdf

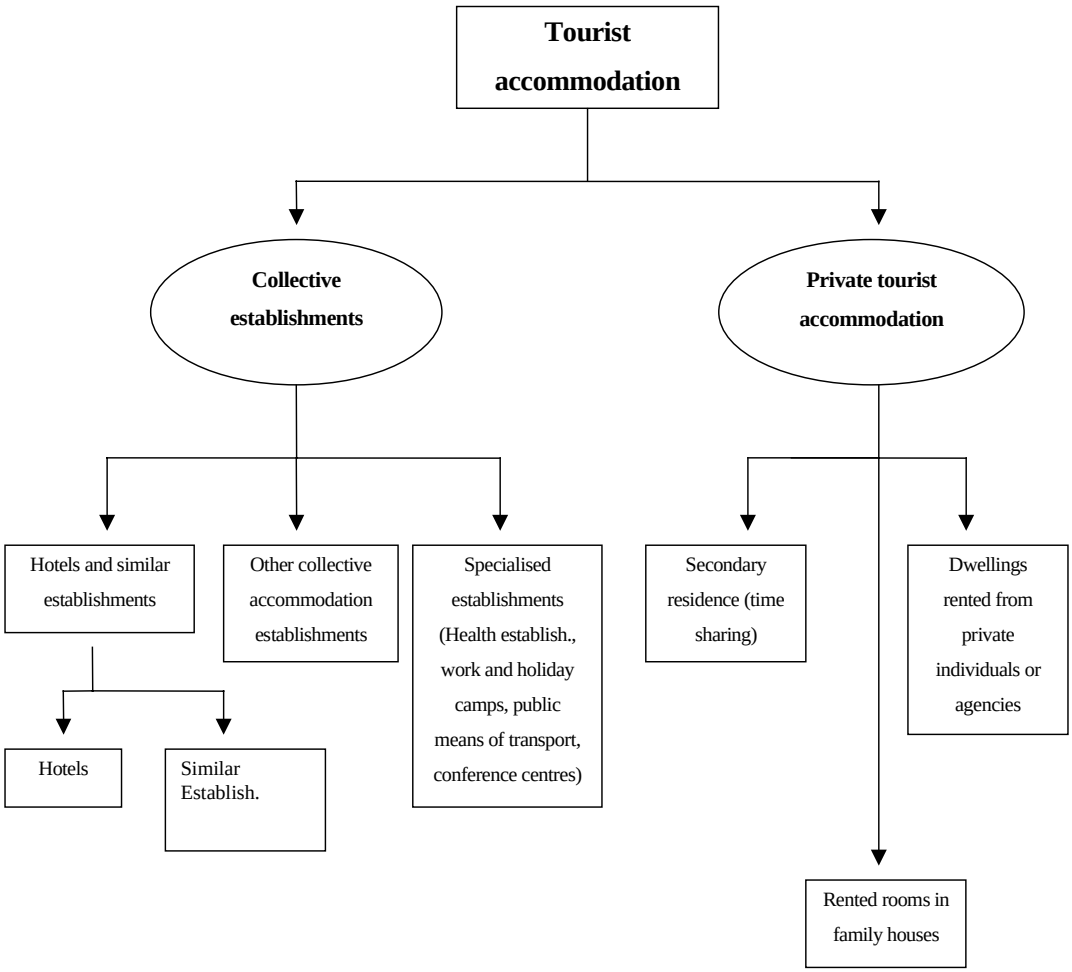
consideration mainly existing structures, and, more importantly, the *service* tourist accommodation; demolishing the accommodation structure is something that is foreseen to happen so rarely that it is not considered.

2.2 Market study of tourist accommodation

A deep analysis of the tourist market throughout the European territory was conducted, as well as the entity of the tourist accommodation offer of the different accommodation structures, with the intent to assess which approach best would satisfy Regulation requirements. The statistical analysis was conducted on the basis of definitions of accommodation structures according to **Commission Decision 99/35/EC**[3] on the procedures for Implementing Council Directive 95/57/EC. This Decision specifically considers tourism structures and provides deeper information on structure classification and services than the previous NACE classification standards.

Table 1 reports the different accommodation structures according to the Commission Decision 15/1/99.

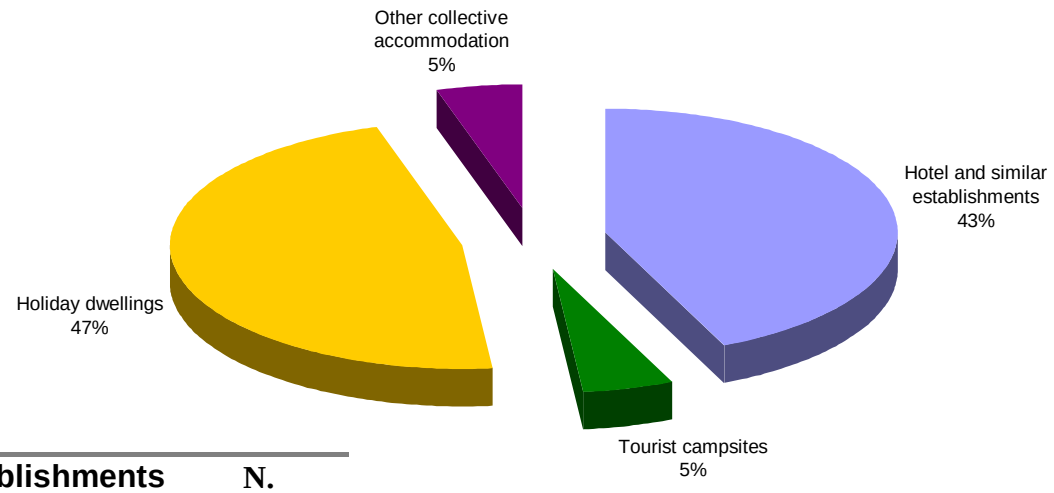
Table 1- Outline of tourist accommodation according to Commission Decision 99/35/CE (elaboration ACTA)



[3] Official Journal L009, 15/1/1999 p.0023-0047.

According to the definitions of tourist accommodation structures as per Table 1 above the following graphs briefly show the results of the tourist offer analysis.

Graph 1- Accommodation establishments in the Europe for the year 2000, organised according to Commission Decision 99/35/CE

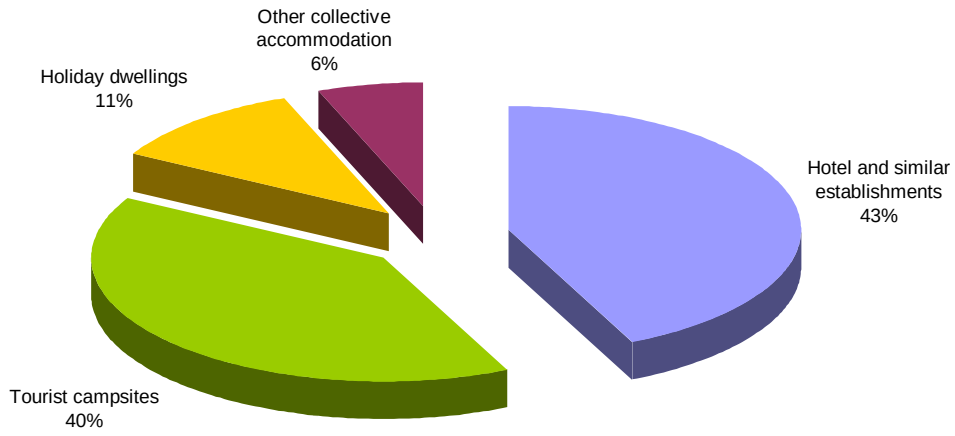


Establishments	N.
Hotel	205.180
Tourist campsites	24.076
Holiday dwelling	222.205
Other	22.598
TOTAL	474.059

Source: ACTA elaboration of Eurostat data, year 2000

From this graph it can be seen that in Europe the number of accommodation establishments is 474 million, of which 90% is distributed quite homogeneously between Hotels and Similar establishments and Holiday Dwellings. These two accommodation types hold the 43% and 47% of the tourist establishments, respectively. The remaining 10% is equally distributed between campsites and other collective accommodation

Graph 2- Tourist accommodation establishments - Number of bed-places, 2.000



Bed places	N.
Hotel	9.715.717
Tourist campsites	9.052.188
Holiday dwelling	2.556.505
Other	1.297.458
TOTAL	22.621.868

Source: ACTA elaboration of Eurostat data, year 2000

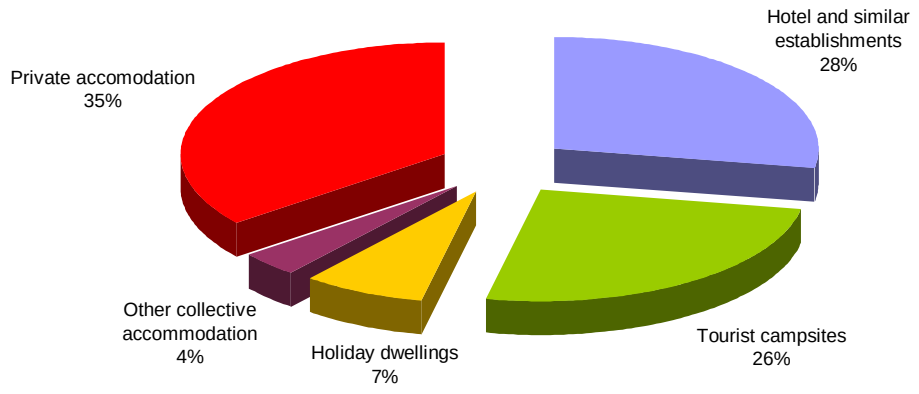
If we analyse the distribution of the tourist accommodation offer with respect to the number of beds, the importance of hotels and similar establishments and of the Other Accommodation remains the same: the percent of hotels and similar establishments is always 43% and the other is 6 %.

On the other hand, for the other types of accommodation establishments things change whether one considers the establishments or the number of beds.
In greater detail:
Holiday dwelling: the establishments represent 47% of the accommodation structures, but the number of beds only account for an 11% of the total number of beds. This means that the holiday dwelling are mainly little receptive units spread across the European territory. This phenomenon is mainly influenced by Spain, the nation with most little holiday dwellings.

Campsites: their situation is the exact opposite of that noticed for the holiday dwellings. They have a great capacity as per number of beds, second only after hotels and similar establishments.

In Graph 1 and Graph 2 private accommodation are not considered. In fact they are a growing type of accommodation structure. Considering the private accommodation, the number of bed places is reported in Graph 3.

Graph 3- Tourist accommodation establishments including private accommodations- Number of bed-places, 2000



Bed places	N.
Hotel	9.715.717
Tourist campsites	9.052.188
Holiday dwelling	2.556.505
Other	1.297.458
Private	12.498.183

Source: ACTA elaboration of Eurostat data, 2000.

Since the service oriented approach would allow taking into consideration different accommodation structures, it was pointed out that the definition of the product group according this approach instead of the structure oriented approach, which would tackle only one type of structure, would allow to cover a greater market share of the tourist offer.

Concerning the product group definition, the first analysis of the tourist offer shows that, in order to allow homogeneity in consumer perception and equivalence of use of the product group, the tourist accommodation structures needed to be divided into two main groups, which could not both be tackled together. The first group included those accommodations which offer a bed within a room, the second group included campsites which offer a place for the tourists' tent.

An analysis was conducted to show the distribution of the types of accommodation structures in the different European member states. It was shown that the accommodation structures classified as accommodation establishments or similar were more evenly distributed in Europe than camping

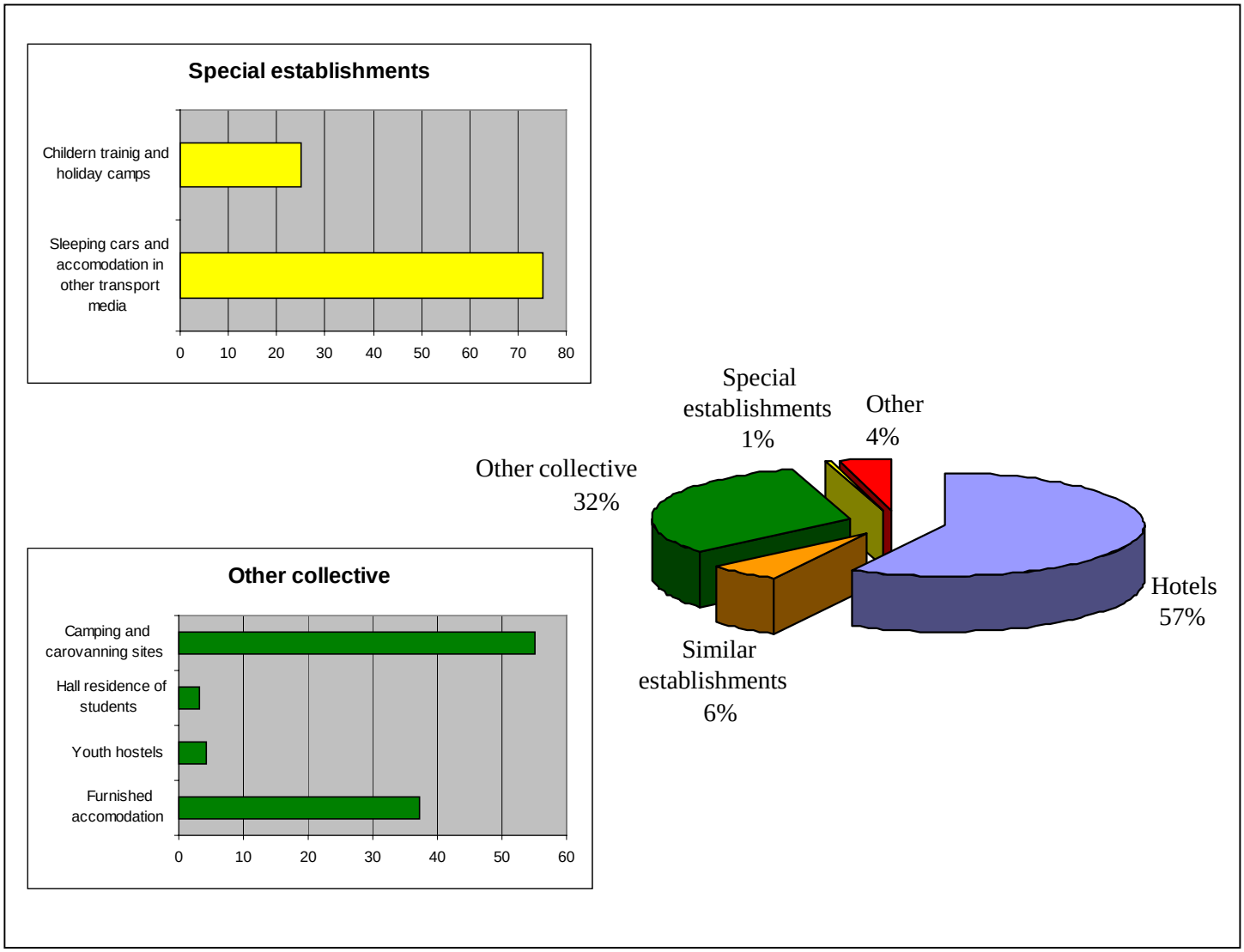
sites[4]. As a first product group, therefore, the search for a product group definition was sought within the accommodation structures which provide a bed within a room. Campsites are included in the part which includes bungalows, whereas the part which is reserved for tent use has been proposed as the very next product group for the EU eco-label on services.

As regards the tourist market, the following Graph 4 shows the distribution of tourist overnight stays according to accommodation structures.

It can be seen that, although camping is an important type of accommodation structure, the main part of the market goes to the accommodation structures which can be assimilated to the category "hotels and similar establishments".

[4] See Second Activity Report

Graph 4- Accommodations in Europe by number of overnights stays, 1998



Source: ACTA elaboration of Eurostat data, 1998.

2.3 Conclusions from the market study

The analysis of the tourist market and the tourist accommodation offer has shown that, although the hotels are still the accommodation structure which hold the highest number of establishments and bed places, are most evenly distributed across the European Member states and host the highest number of overnight stays, there is no one structure which can be considered as being absolutely preponderant over the others. Therefore, the structure-oriented approach would exclude an important number of environmental impacts due to the service tourist accommodation, which, on the other hand, would be considered by the service-oriented approach. The service-oriented approach, in addition, allows to include any change in tourist accommodation structures to different forms, which all have in common the provision of the lodging service, the essence of tourist accommodation.

2.4 Definition of the tourist accommodation service according to a service-oriented approach and identification of the system boundaries

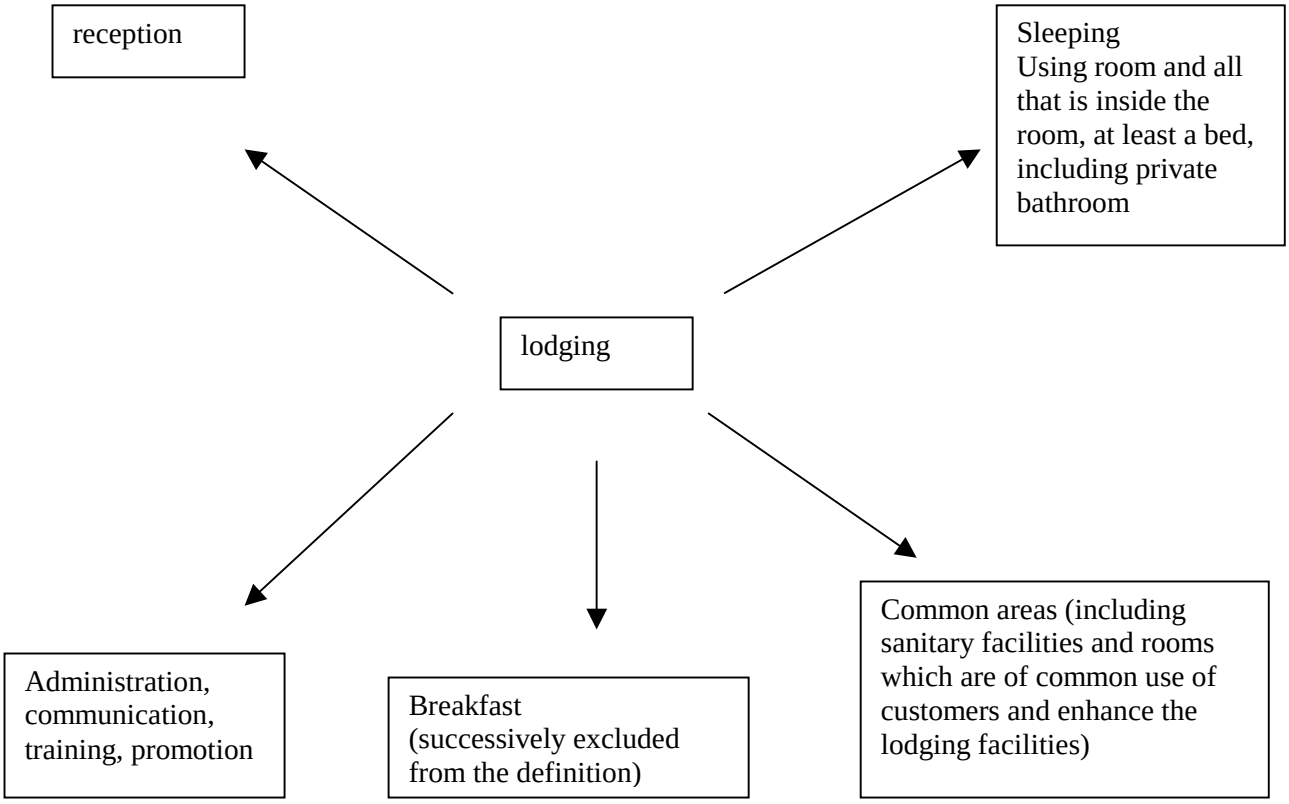
Once decided for the service-oriented approach, the successive step was to define the product group and its system boundaries.

From the Regulation, it is required that the product group be equivalent in use, in consumer perception and that it offers the best opportunity for positive influence of the criteria in a significant reduction of the environmental impacts. Therefore, the aim of the next step of the study was to define in concrete terms the "tourist accommodation" service so as to fulfil the Regulation requirements for the product group. As a starting point, from Commission Decision 99/35/CE it could be inferred that the essence of the tourist accommodation was the provision of shelter for the overnight stay. This essence was proposed as the "lodging service" described as follows:

"the provision of sheltered overnight stay in accommodation with appropriately equipped rooms, including at least a bed, offered as a main service to tourists[5] travellers and lodgers for a fee."

Figure 1 reports the system boundaries of the product group as defined above as a result of the results presented at the first AHWG meeting and successive discussions.

Figure 1: Elements included as our product group "lodging" after the First AHWG.



[5] The official definition of tourist, according to the World Tourism Organization is: any person who travels from his usual place of residence where he earns the major part of his income, for at least 24 hours (which includes an overnight stay)t and for less than one year.

The front office (reception) and the back office (administration, communication, training and promotion) were included as well as all that is inside the guest room and the common areas for the use of the guests. These were defined the system boundaries of the lodging service.

2.4.1 Class A: lodging services

To assert the appropriateness of this product group definition the hotel was chosen as the accommodation structure on which to conduct further analyses. The hotel was chosen as the accommodation structure of reference because of its even distribution in the European territory, the amount of information available on this structure, and the complexity of its service. It was evaluated that conducting a study on the most complex structure would allow the development of criteria which could automatically apply to more simple types of accommodation, whereas the opposite was considered not possible.

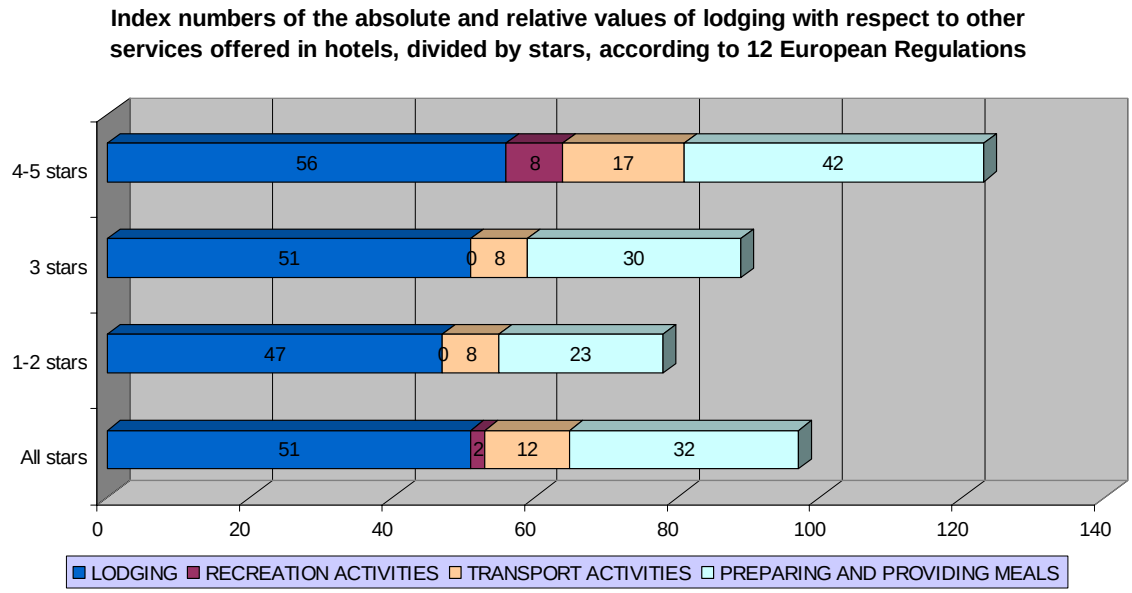
Hotel services as required by law
A study of the official hotel regulations, whether compulsory or voluntary, showed that the required accommodation services can be divided into the following categories:

- structure of the accommodation
- room
- reception
- food services
- common services
- communication, training and promotion

The elements present in these categories were reported and counted in order to obtain an index number of presence. The results are reported in

Graph 5. It can be seen that the main services are related to the lodging service, as defined in the product group system boundaries reported above.
This proves the coherence of the product group definition with respect to national hotel regulations. Since the hotel service is the most complex service, it can well be inferred that this result is all the more valid to other, more simple tourist accommodation structures such as Bed and Breakfast facilities or holiday houses and private accommodation.

Graph 5- Distribution of minimum services required by the main 12 European classification schemes according to stars. The services have been grouped into four main classes of services**.**



These numbers represent how many elements were listed as necessary in lodging, recreation activities, transport activities and preparing and providing meals. Although these numbers are index numbers and are a result of some calculations, they may be considered as representing an "absolute value".

As an average, 51 lodging elements included in the product group system boundaries are required by hotel regulations, compared with 2 recreational activities, 12 transport activities and 32 food service activities.

Table 2 reports these same values in terms of percentage instead of index numbers of presence.

Table 2: Relative weight of each service per star as reported by official regulation and classification schemes in Europe. Percent value.

	All stars	1-2 stars	3 stars	4-5 stars
LODGING	53	60	57	46
RECREATION ACTIVITIES	2	-	-	7
TRANSPORT ACTIVITIES	12	10	9	14
PREPARING AND PROVIDING MEALS	33	29	34	34

Looking attentively at the components listed in the different national regulations, it was possible to identify the elements and activities which best indicate the lodging service and divide them according to the physical boundaries described below. For the purpose of the study these components and activities were successively referred to as Class A services.

Class A services are all those components and activities linked to sectors of tourist accommodation which can be divided according to the following physical boundaries :

A-1	Room premises
A-1-1	Bedroom area
A-1-2	Private Bathroom
A-2	Reception/administration area
A-3	Common Rooms: facilities to reach the lodging premises
A-3-1	Corridors/extra room
A-3-2	Common rooms (including common TV or lounge with the piano)

It can be seen that these include all the activities expressed in the product group definition, as reported above and are directly involved in the provision of "sheltered accommodation" , according to the definition of Commission Decision 1999/35/CE for the collection of statistical data relating to tourist accommodation.

The Class A elements have more stringent criteria and mainly constitute the mandatory section of the award scheme (see further).

2.4.2 Class B: extra lodging services

Setting a system of boundaries was necessary to clearly identify the field of reference of the criteria. As it was described above, those elements included in the system boundaries of the lodging service were defined as Class A elements, those belonging to extra lodging services were defined Class B elements. This brought us to tackle breakfast again, although it had been excluded from the product group definition.

Breakfast

The analysis of the national regulations on hotel classification allowed the identification of the most essential elements of the lodging service. As a result of this analysis breakfast was taken out of the product group. It was seen that, although offered often, it was not required as the real core of "sheltered accommodation".

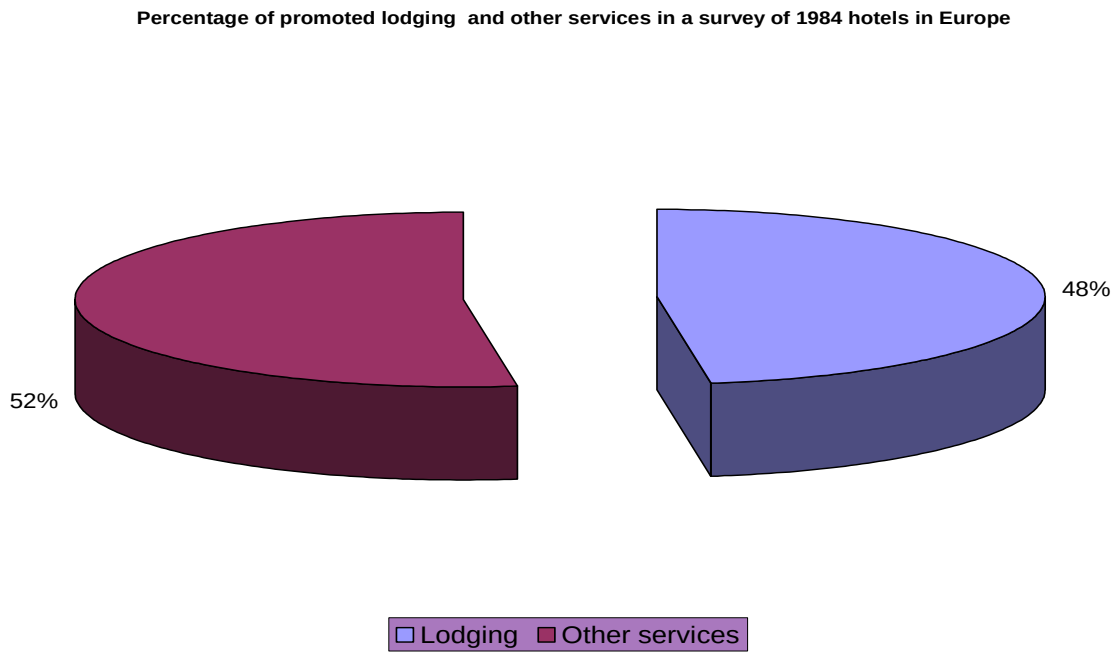
Extra lodging services

Another result of this analysis was the observation that although the lodging services are the main ones, there are other services which are required and may be offered which are outside the main lodging service but which may have a significant impact on consumer perception. These services needed to be identified in greater detail than was possible only through the analysis of regulations, which only identified services connected to food and fitness services.

In order to check the potential importance of the services secondary to lodging in consumer perception, a study was conducted on the nature and frequency of these services in promotional material, which is most closely linked to consumer perception. For this scope, the services reported in official national hotel guides from all European countries (EEC) were listed from over 2000 hotels throughout Europe, and they were divided into lodging and extra-lodging services. The results obtained validated the observations from the regulation analysis: the lodging services are advertised in a greater percent than the extra-lodging services but the high percentage with which these last ones appear, makes them important for consumer perception. For this reason, although they are not part of the product group, it was decided to take them into consideration during criteria development, so as to guarantee a homogeneous environmental performance of the structure, even outside the lodging service, and assure a positive image of the EU eco-label to consumers.

Figure 2 shows the lodging and extra-lodging services found in the analysis of nearly 2000 hotels throughout Europe.

Figure 2- **Promoted lodging services with respect to other services in hotels in Europe (n=1984)**



The lodging and extra lodging services identified in the analysis are the following:

Extra lodging services

Services other than lodging
Parking
Park/garden
Pets welcome
Congress centre facilities
Bar
Baby sitting
Tennis and other sports
Restaurant
Access for the disabled
Swimming pool
diet meals available
Sauna
Groups welcome
Fitness
Private Beach
medical service
Transportation
Garage
Shopping area
Disco/night
Simultaneous translation
Bicycle rent
wellness facilitiies

Lodging services

Elements and services included in the lodging service
TV
Telephone
Independent heating
Lift
Radio
Frigobar
Credit cards accepted
Laundry
Hair dryer
Common Rooms
Air conditioning
Safe
Change
Suite
Room Service
Business room
video in rooms
Internet
Extra bed
Fax
Antiallergic room

Similarly to the analysis of national regulations, the analysis of the hotel guides allowed the identification of the main extra-lodging services. These were classified according to "service type" categories rather than by physical boundaries since the physical boundaries were in fact of secondary importance as long as they were within the accommodation grounds and under the direct management of the accommodation manager. For the purpose of the study these components and activities were referred to as Class B services.

Class B services are all those components and activities linked to sectors of tourist accommodation which can be divided according to the following categories:

B1		FOOD SERVICES
	1	Kitchen
	2	Restaurant
	3	Bar
B2		WELLNESS AND RECREATION
	1	Swimming pool
	2	Tennis
	3	Golf
	4	Other sports within the hotel premises
	5	Sauna
	6	Fitness room
	7	Solarium
	8	Private Beach
	9	Disco/night club
B3		CONFERENCE SERVICES
	1	Conference hall
	2	Simultaneous translation
	3	Common Rooms to conference area
	4	Sanitary facilities of conference area
	5	Reception and Administration of conference area

B4		GREEN AREA
	1	garden
	2	park
	3	fields
B5		PARKING AREA
	1	indoor parking space
	1	outdoor parking space
	2	Transport means
	a	bicycle
	b	car
	c	bus
B6		SHOPPING SERVICES
	1	Supermarket
	2	Other shops
B7		OTHER

It can be seen that these services constitute an important part of consumer perception, although they are not the core of tourist accommodation. They were nonetheless considered as per environmental impacts and successively criteria development in order to guarantee a homogeneous coverage of the criteria over the entire services having significant environmental impacts and influence on consumer perception.

2.5 Identification of the environmental impacts of the tourist accommodation service

The methodological steps which led to the identification of the main environmental impacts of the tourist accommodation service will be discussed in detail in Chapter 3, here we will briefly point out some of the main elements which were important for the definition of the product group.

As requested by the Regulation, the environmental impacts of the tourist accommodation service were identified according to a life cycle approach.

The life cycle of a service includes three main phases:

1. the purchase of the goods to provide the service (purchase phase)
2. the supply of the service which includes using the goods which were purchased (the use phase)
3. the management of the waste produced from the use phase (the waste management phase)

The lack of reliable, exhaustive and comparable quantitative data on the environmental impacts of tourist accommodation required the elaboration of a specific methodology in order to assess the potential impacts. The analysis was conducted on two main elements: existing eco-labels, as described in Chapter 3, research with specialists in each field, AHWG meetings and EU environmental policy, described in Chapter 4.

2.5.1 Analysis of existing eco-labels

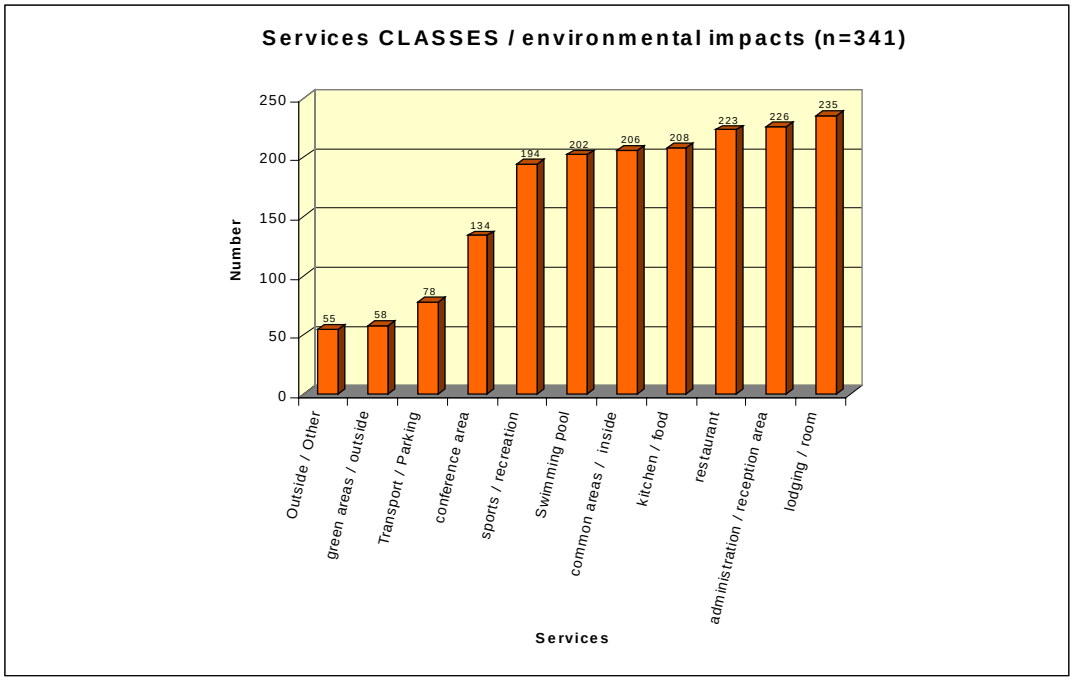
In this paragraph the analysis conducted on existing eco-labels shall be very briefly described. The environmental impacts were assessed by analysing the criteria from seven national and regional eco-labels[6] on tourist accommodation and evaluating them against the environmental aspects reported in Annex I of Regulation 1980/2000 as well as putting them in relation with the pertaining phase of the life cycle. The eco-label criteria of the official eco-labels were assumed to address the most important environmental aspects of tourist accommodation, and for this reason, the services to which the criteria referred were identified and analysed according to two different variables: the type of service (lodging, food service, fitness etc) and the environmental aspect involved: energy saving, climate change, ozone layer, water, management of natural resources etc, according to Annex I of the Regulation.

The quantitative entity of the environmental impacts was assessed according to the frequency with which the criteria of the analysed existing eco-labels addressed certain environmental issues. The more criteria addressed a particular service, the more that service was considered to have potential negative environmental impacts.

Graph 6 shows the results obtained from the environmental impacts analysis. This analysis was conducted from three national eco-labels from Austria, Scandinavia and Catalunia[7].

[6] Umweltzeichen (At), Les Clefs Vertes (Fr), Nordic Swan (Scandinavia), Via Bono (D), Great Tourism Business Scheme (Scotland), Die Groenne Noegle (DK), El Distintivo de Qualidad (Catalunia).
[7] Austria: Umweltzeichen; Scandinavia: Nordic Swan; Catalunia: El Distintivo de Qualidad

Graph 6- The Environmental relevance of lodging and other service classes



Graph 6 reports the number of criteria from three national eco-labels (for a total of 341 criteria) referring to a component of the lodging or extra-lodging services. It can be seen that the lodging service is the most relevant service class. Most environmental criteria are related to „room“ and „reception/ administration“ as main components. Other services also have a high environmental relevance, especially food and fitness services.

2.5.2 LCA: identification of the aspects and impacts of the tourist accommodation service in the different phases of the life cycle

It is important to notice that the environmental aspects reported in Annex I of the Regulation 1980/2000 are interlinked and in this analysis they were considered in a more aggregated way, so as to aggregate them into environmental objectives, mainly energy saving, water saving, chemical reduction and waste management. It can be easily seen that all together these objectives influence climate change, protection of the ozone layer, of soil, biodiversity, quality of air and water, and management of natural resources.

Concerning the phase of the tourist accommodation service which has most impacts, all three have shown to be important.

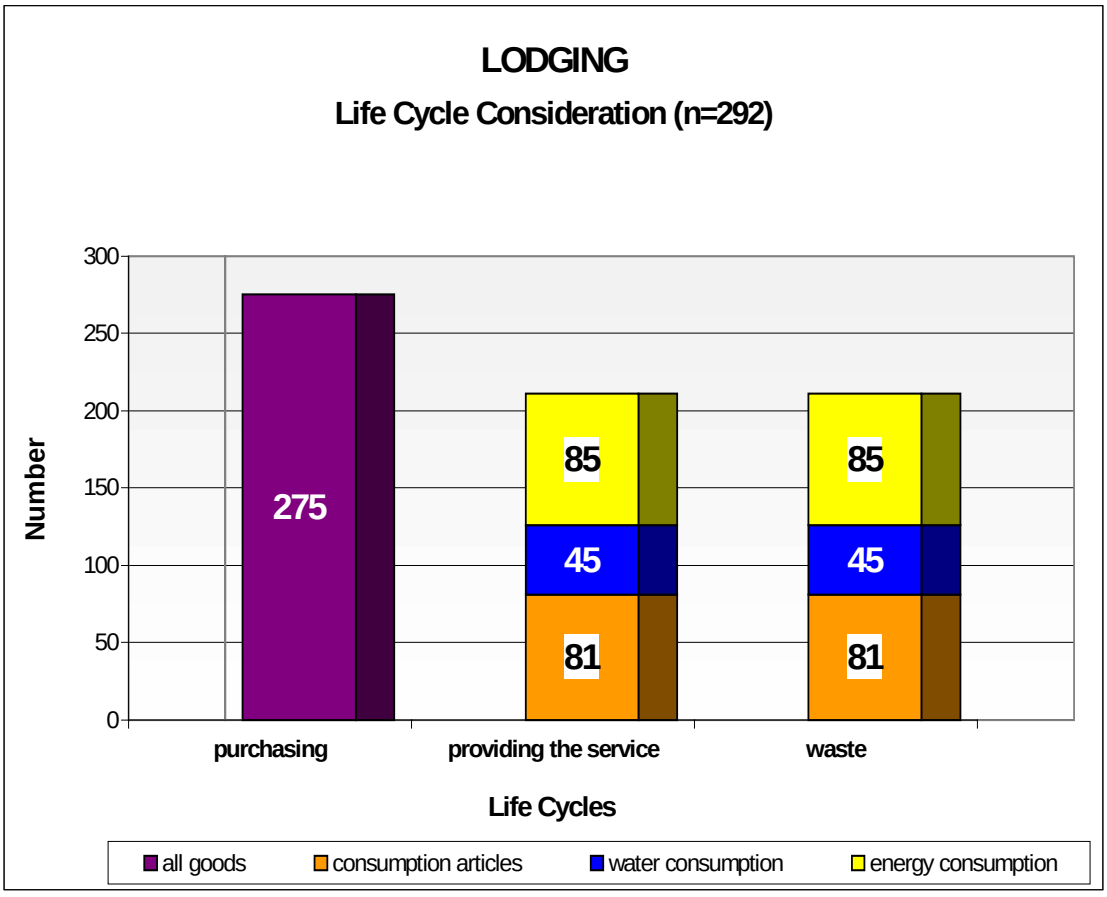
The purchase phase mainly considers the provision of durable and non durable goods, energy and water. This phase mainly relates to the quality of the resources available for use (eco-labelled goods, energy from renewable sources, rainwater). The main influencing factor of the purchase phase is the accommodation manager and the limiting factor is the availability of the resource on the market and its price.

The use phase is mainly related to the quantity of resources used (non-durable goods, energy, water) which is influenced both by technology and by consumer/staff/lead behaviour (insulation, water saving devices, responsible behaviour by guests and staff on the use of resources).

The waste management phase is directly linked to the use phase because waste is a result of the use phase. The waste management phase mainly involves the appropriate disposal of hazardous and urban solid and liquid waste. The main influencing factor of the waste management phase are guest and staff behaviour.

Graph 7 reports the distribution of the criteria of the seven national and regional eco-labels according to the different phases of the tourist accommodation service.

Graph 7 – Distribution of the environmental impacts of the tourist accommodation according to a life cycle approach.



This graph shows that 275 of 292 environmental criteria for lodging relate to physical goods, and as such relevant in the purchasing phase (17 of 292 are specific management activities).
81 goods are consumed themselves as short term goods (toilet paper, give aways, washing powder for textile cleaning, etc.). The use of 45 goods causes the consumption of water, 85 goods consume energy. In consequence they end as waste, produce waste water and emissions.

2.6 Conclusions of the product group definition

From the in depth study of the above stated national eco-labels some observations were made as follows.
The analysis of the environmental impacts of tourist accommodation services confirmed that the lodging service has most of the environmental impacts. These are concentrated in the three main components "room", "reception/administration" and "common services", and they are very similar one to the other.
Three quarters of the environmental impacts of all the lodging services with all their elements are linked to:

- consumption of non durable goods (and their end as waste)
- consumption of energy
- consumption of water

These results show that lodging is a suitable product group not only from the standpoint of legislation and standard setting initiatives, but also from an environmental point of view.
Having set the system boundaries of the lodging service, it has been believed that developing criteria so as to relate in great detail to those elements, would allow to achieve the best environmental improvements.
The environmental impacts related to the extra-lodging services include non-durable goods, energy and water consumption. In particular, food services and fitness services are the two most impacting services outside the product group system boundaries. The analysis of the promoted offered services conducted on the official hotel guides has proved itself fundamental to the identification of these services, so as to allow the identification of the main impacting elements of the extra-lodging services.

On the basis of these findings the ecological criteria were developed for the product group "lodging service", defined as **"provision of sheltered overnight stay in accommodation with appropriately equipped rooms, including at least a bed, offered as a main service to tourists[8] travellers and lodgers for a fee".** The criteria developed for this product group concentrate mainly on elements included within the lodging service system boundaries (Class A services), however they also address other extra-lodging services, as identified in the study on the promoted offered services (mainly concerning food services, such as breakfast, fitness services and management of green areas under the ownership or direct management of the accommodation), in order to guarantee a homogeneous positive consumer perception on the environmental performance of the accommodation. These extra-lodging services were called Class B services for the purpose of the study, although no differentiation results in the draft document.

Of the lodging and extra-lodging services the main components and their relative environmental impacts were identified. This was the basis for the development of the ecological criteria for this product group.

In the next chapter the methodological steps which led to the identification of the environmental impacts of the tourist accommodation service shall be described in further detail. be outline of the award scheme is briefly reported, including the aims of the criteria, the factors influencing them, the types and nature of the criteria.

[8] The official definition of tourist, according to the World Tourism Organization is: any person who travels from his usual place of residence where he earns the major part of his income, for at least 24 hours (which includes an overnight stay)t and for less than one year.

Of the Class B services, those which best fulfil Regulation requirements of importance on the market and environmental impacts, as can be seen from the results of the research on hotels guides and environmental impacts (Graph 6) are food services and fitness services, which are those most considered in criteria development.

The following chapter describes the analysis of the environmental impacts of the product group tourist accommodation.

3 ANALYSIS OF ENVIRONMENTAL IMPACTS

The tourist accommodation service was studied according to a life cycle approach, and the different services as identified in the product group definition analysis were checked against the environmental issues listed in Annex I of the Regulation 1980/2000.

3.1 The state of the art

The aim of the life cycle analysis of the" tourist accommodation service" as a whole, was to identify the main environmental impacts of the different specific tourist accommodation services, centred in lodging but taking in consideration the other offered services, in order to develop European criteria able to reduce those environmental impacts.
When starting this analysis, two main things had to be considered. First is that there are no comparable, reliable quantitative data available which represent the environmental impacts of accommodation services offered in Europe. Second is that, differently from a "good", the tourist accommodation service is multi faceted and, as the research on the product group revealed, it can be very different according to category and to condition. It can be well said, that no accommodation establishment is exactly the same as another. The reasons are easy to understand: every element in the establishment, for example in the room, has its specific quantitative and qualitative environmental impacts which depend on the way it was produced and brought to the accommodation structure, by how and how much the element is used within the accommodation service, and by the waste it produces. The size of the room and the building have, for example, influence on the energy consumption. Other impacts depend on the quality and quantity of the services offered (inside or outside the room) and on the location/region of the establishment. For example, the same service may have different impacts in the city or in the countryside, depending on the vulnerability of the environment, on the degree of management provided by local authority and by the number of people which use the service. The behaviour of the people is also very important, because it can very much influence the impacts deriving from the use phase of the service.

For these reasons, there is a lack of reliable, objective direct data on the environmental aspects of tourist activities. This did not allow a purely quantitative evaluation of the environmental impacts of the tourist service, according to formulas and numerical results. In order to identify the main environmental impacts of the tourist accommodation service it was necessary to adopt an inductive approach, starting from the best available data on the main impacts of the tourist accommodation service. This data was found in the existing eco-labels.

3.2 Life cycle considerations of the tourist accommodation service.

It was considered that the most important, reliable and pragmatic source for analysis of the environmental impacts of the tourist accommodation services could be extracted by a deep analysis of existing official national / regional eco-labels in different European countries developed according to procedures similar as those laid down by the Regulation. The criteria from these eco-labels were taken as the base for the inductive assessment of the environmental impacts. It was assumed that the criteria from these existing national eco-labels took into consideration the specificity of their nation/region, were non discriminating and addressed the most important environmental impacts of

the tourist accommodation service by expressing criteria directed specifically to the relevant services and components.
In the following paragraphs the analysis of the potential environmental impacts of the tourist accommodation service is explained in detail[9].

3.3 Identification of the main environmental impacts of the tourist accommodation service

For the reasons explained above, the identification of the main environmental impacts of the tourist accommodation service was conducted starting from a deep analysis of the existing eco-labels on tourist accommodation in Europe. The analysis re are about 40 Eco-labels for Accommodation in Europe, some of them operating since many years, some leading schemes on regional, national, international level. We assumed that the leading Eco-labels on national/international level which are operating since two or more years have the main experience on this issue in Europe. Some of them are public schemes which follow their own national regulations which require (similar to the EU-Flower regulation) LC considerations, the assessment of the environmental impacts and the potential for improvements, and performance criteria which guarantee that the certified product is better than non certified competitors in the same (type of) destination/ country.

It was assumed that these Eco-labels

1. developed their environmental criteria according to the specific situations in their countries without discriminating products which belong to the product group
2. checked these criteria as relevant and feasible (operating since years, high experience with certified products, market studies)

The eco-labels were selected as described below, and considerations were made on the results of the analysis of their criteria. For example, those criteria which were found common to all eco-labels were assumed to have a high relevance and feasibility on international / European level, for different types of accommodation structures.

From the analysis the most relevant impacts were identified.

Selection of most relevant Eco-labels
For a first assessment of environmental impacts the following three Eco-labels have been analysed:
Nordic Eco-label (SE, FI, NO, DK, IC)
Austrian Eco-label (AT)
Catalunia Eco-label (ES)

These Eco-labels are following their national legislation which requires similar approaches as the European regulation for the EU-Flower. They cover three main types of regions in Europe: North, Alps, Mediterranean.

At a later state, when developing criteria in detail, the experiences of further relevant Eco-labels were considered:
Luxemburg Eco-label for Tourism (LU)
Green Tourism Business Scheme (UK)
Green Key (DK)
Viabono (DE)

[9] For greater detail see Second Activity Report

These four Eco-labels are private/public schemes which have been operating since years, widely recognised by the product groups and other groups of interest (consumers, environmentalists), in co-operation with/ supported by national governments (LU, UK, DK, DE)

Altogether the seven schemes above have been selected for the following reasons:

1. they cover different countries, regions, main types of destinations in Europe (North, South; mountains, cities, coast, rural)
2. they cover all types of hotels and similar establishments (Austria, LU, UK), the most complex structure,
3. they require all types of criteria (management + measures + limit , see details in Part II of this report)

The code book for analysis of existing eco-labels

The three public Eco-labels (Nordic, Austria, Cataluna) altogether require 341 individual environmental criteria (no reduction of similar criteria). These criteria were analysed with respect to the following issues:

1. Countries where the Eco-label is applicable
2. Types of Accommodation structures for which the Eco-label is applicable
3. Relation to the life cycle phases and its service activities
4. Relation to the main factors influencing the environmental impacts
5. Type of criteria (management, measure, limit)
6. Relation to EMAS
7. Relation to eco-labelled products
8. Type of requirement (mandatory, obligatory)
9. Environmental impact / objective (11 environmental issues)
10. Relation to Service class/es (class A, classes B1-B7)

3.4 Environmental aspects, impacts, objectives.

It is important to explain what is meant by type of environmental objectives and subsequent Environmental Aspects/Objectives. The voices reported in Annex I of the Regulation are of different logical nature and it is necessary to clarify the way these issues have been referred to.

Annex I of Regulation 1980/2000 reports issues which are in the two categories of environmental aspects (quality of air, quality of water, environmental safety, biodiversity), and environmental objectives (soil protection, waste reduction, energy saving, prevention of global heating, protection of the ozone layer). Management of natural resources (and also waste reduction, stated above) can be considered as an action which must be undertaken in order to reduce the impacts on the environmental aspects and to reach the environmental objectives.

These voices, in general can be regrouped as direct or indirect environmental objectives.

In order better explain and illustrate the differences of the environmental issues listed in Annex I of the Regulation, the following examples are made:

Energy.

Energy is needed to heat the room, to cook, to make some light. Energy per se is not a natural resource but it is the product of a process on natural resources. Therefore, energy saving, one of the voices listed in Annex I, is an environmental objective. It has the double result of saving the resource needed to provide energy, limiting the consequences of the process required in order to obtain energy from that natural resource and bringing the energy to the accommodation, and saving the impacts of the waste products of energy use. These impacts have influences on elements which in Annex I are listed as environmental aspects (quality of air, biodiversity) and as environmental objectives: prevention of global heating.

Water

Another example is water. Water is a natural resource and is used in many instances, such as using bathroom facilities, heating, cleaning, kitchen, swimming pool. The Management of natural resources implies saving water. The "quality of water" does not have a direct link with the saving water from the WC or the kitchen, but it is certainly a consequence of water management as a whole, which includes quantitative and qualitative issues linked to water capitation, treatment and disposal. Saving and managing water could reduce the negative impacts on biodiversity, and could reach the objective of soil protection.

Chemicals

The use of chemicals has impact on the quality of water, on soil protection, on biodiversity.

Packaging

Packaging is also a result of use of natural resources and processes, and, its impacts on the environment are the impacts of the life cycle of the packaged product.

Waste

The use of any good and service creates waste, either material (packaging, dirty waste water…), or immaterial (energy).

Summarising, the main environmental impacts which were identified by the research linked to the quality and quantity of energy, water, chemicals and waste were put in relation with the environmental issues listed in Annex I of the Regulation as follows:

1. the quality and consumption of energy are linked to the :
   - quality of air
   - energy saving
   - management of natural resources (renewable and non renewable sources of energy)
   - prevention of global heating
   - protection of the ozone layer
   - environmental safety
   - biodiversity

2. the quality and consumption of water are linked to the :
   - quality of water
   - soil protection
   - energy saving (for hot water)
   - management of natural resources (water is a natural resource)

3. the quality and consumption of chemicals are linked to the:
   - quality of air
   - quality of water
   - soil protection
   - protection of the ozone layer
   - environmental safety
   - biodiversity

4. the quality and production of waste are linked to the:

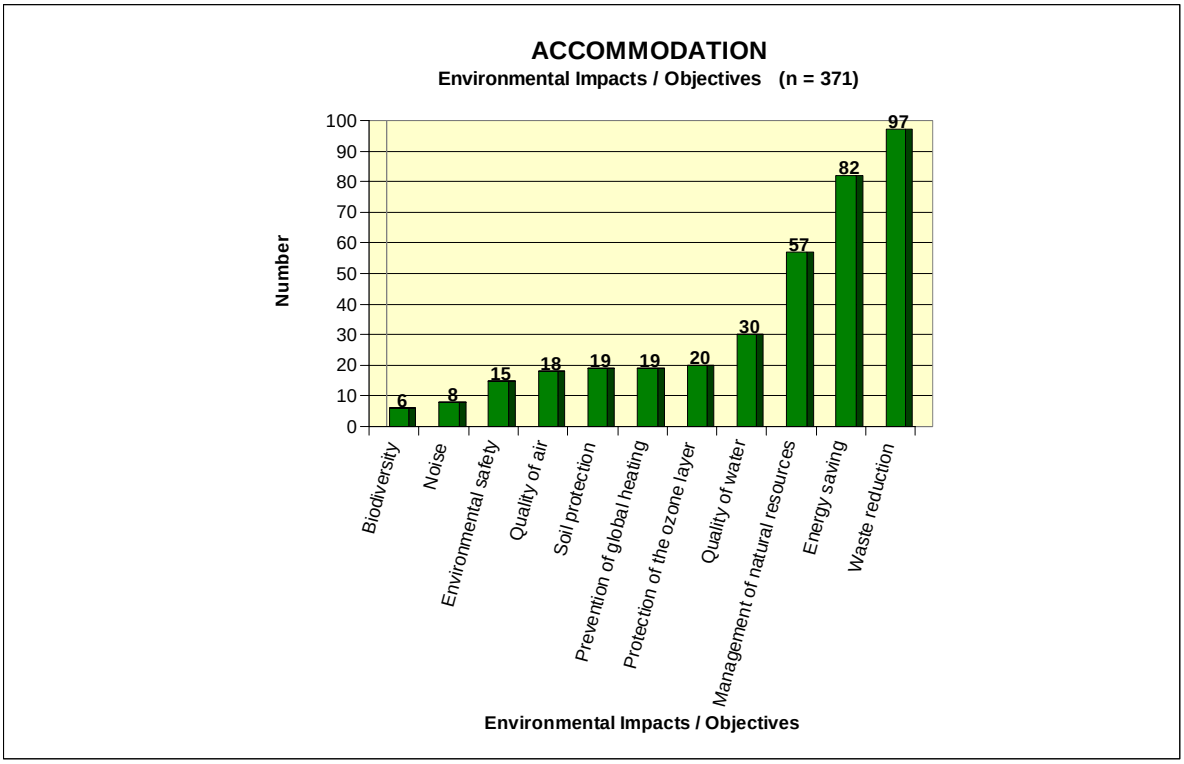
- quality of air
- soil protection
- environmental safety
- biodiversity

The quantitative entity of the environmental impacts was assessed according to the frequency with which the criteria of the analysed existing eco-labels addressed certain environmental issues.

3.4.1 General results

The analysis of the environmental impacts by means of existing eco-label criteria has been conducted in order to assess the main environmental impacts of the elements constituting the product group and derive the system boundaries accordingly. As has been already reported in Chapter 2, Graph 6, the lodging service is the most relevant service class. Most environmental criteria are related to „room" and „reception/ administration" as main components but other extra lodging services also have a high environmental relevance, especially food and fitness services. The environmental impacts of the tourist accommodation services were put in relation with the environmental issues listed in Annex I of Regulation 1980/2000, as can be seen from Graph 8 below.

Graph 8- The environmental impacts of the whole accommodation service: relation to the eleven global environmental aspects listed in Annex I of the Regulation



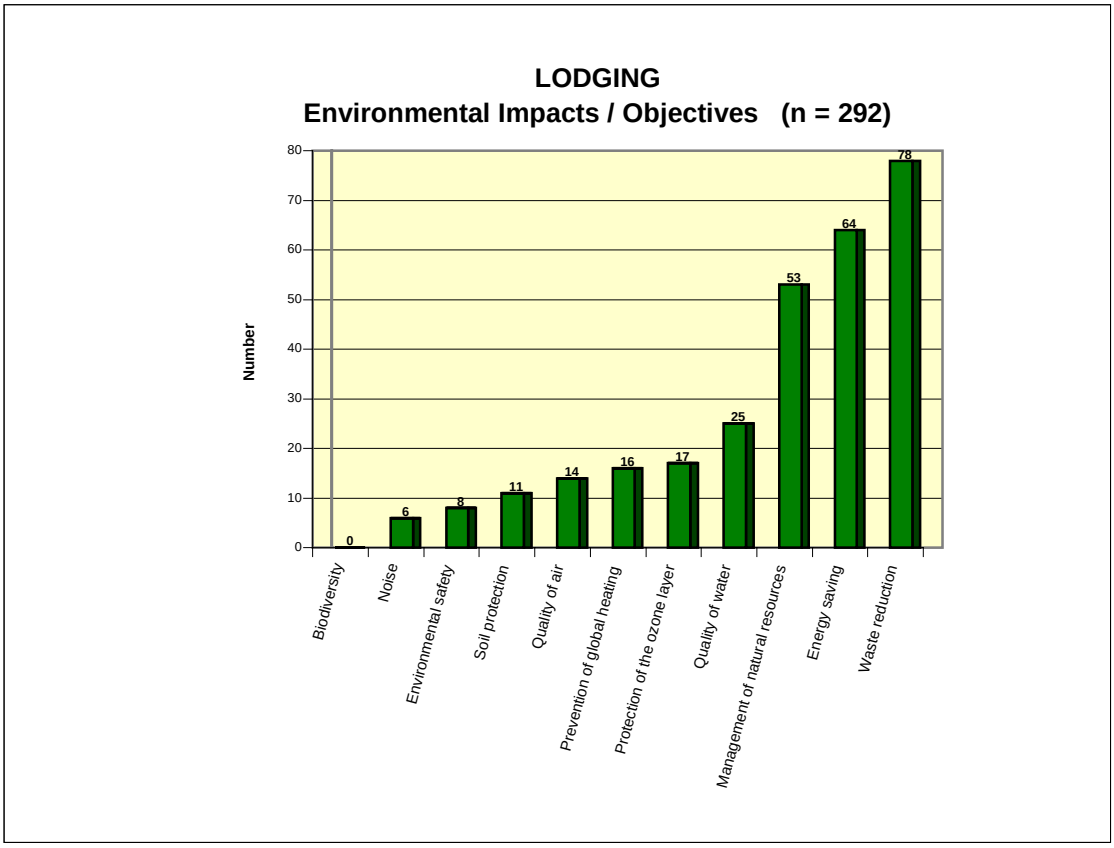
N = number of criteria

From Graph 8 it can be seen that the most important environmental impacts and objectives in relation to tourist accommodation service are: waste reduction, energy saving, and natural resources (above all: water). Two other important issues are quality of water and protection of soil and of the ozone layer, which are strongly linked to the consumption of chemical substances.

3.4.2 Specific results

From the more specific point of the lodging service, as described by the product group definition, the environmental impacts are very similar as those of the tourist accommodation taken as a whole. Graph 9 shows the environmental criteria identified in the lodging service in relation to the 11 environmental aspects of Annex I of the Regulation.

Graph 9- Environmental impacts of the lodging service in relation to the eleven global environmental aspects of Annex I of the Regulation



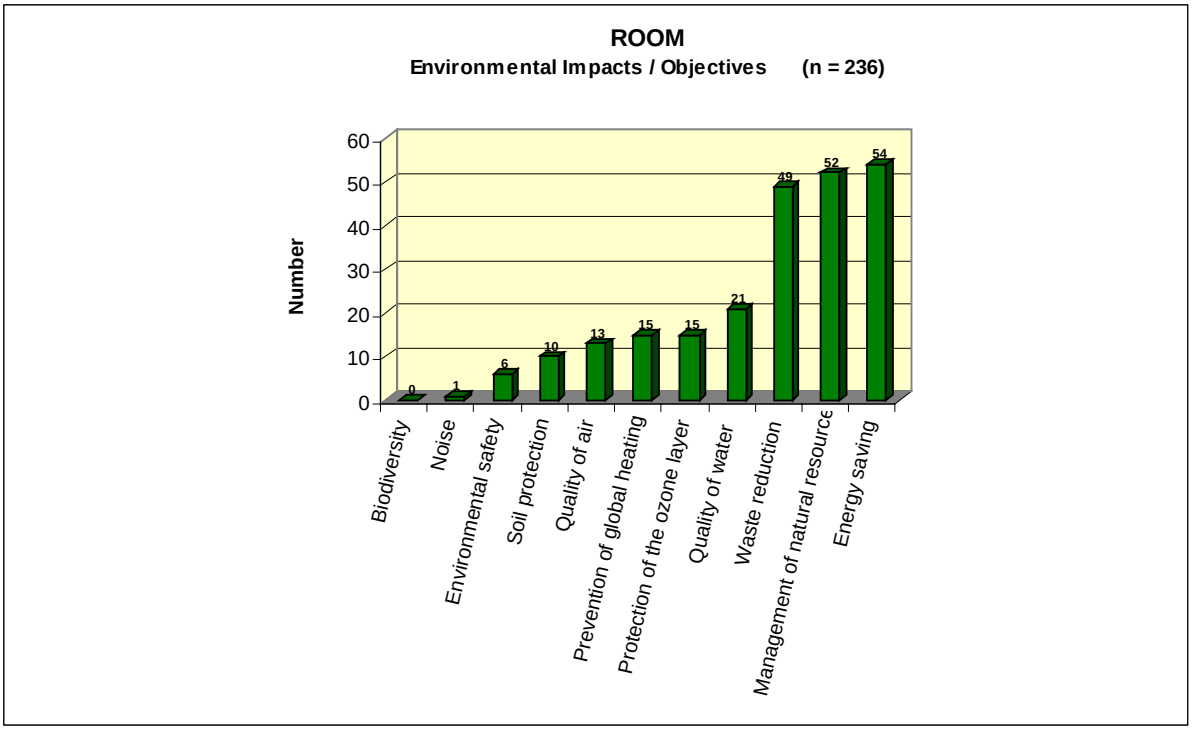
N = number of criteria

Graph 9 shows that the most important environmental impacts and objectives of the lodging service are: waste reduction, energy saving, and natural resources (above all: water). Two other important issues are quality of water and protection of soil and of the ozone layer, which are strongly linked to the consumption of chemical substances.

Sub-dividing the different components of the lodging service, as identified in the product group definition: the room, the common rooms and the administration /reception activities, the results were that two thirds of all environmental impacts in the "room" services are linked to the consumption of energy and water and the produce of waste.

Graph 10 below reports the results of the main environmental impacts of the room service, contained within the system boundaries of the product group.

Graph 10 - The environmental impacts of the " room" as lodging component in relation to the eleven global environmental aspects of Annex I of the Regulation



N = number of criteria.

For the "common room" services, the results were the same, while for the "reception/administration" lodging components, the analysis showed that the main environmental impacts derived from waste production (mainly paper, toner, ink) and energy consumption. Water had a lesser importance.

3.4.3 Allocation of the environmental impacts with respect to the life cycle phases of the tourist accommodation service

Considering the environmental impacts identified above with relation to the different phases of the accommodation service, as is shown in Graph 7, 275 out of 292 (94%) environmental criteria relate to physical goods, the remaining are management activities.

From the analysis of the criteria relating to goods, it was seen that 81 (30%) are particularly relevant in the purchase phase because they are non durable goods (toilet paper, toiletries, detergents…). Other 45 goods (16%) are responsible for water consumption (WC, tap, shower…) while another 85 (31%) are mostly responsible for energy consumption (TV, electrical office and cleaning equipment). The remaining criteria are linked to other environmental issues.

All these objects produce waste products in relation with the environmental impact.

For non durable goods, the waste derives from the object in itself and is mainly connected with the collection of special and urban waste having impacts on quality of soil and emissions linked to waste management (incineration, for example). Hazardous waste is mainly connected with batteries, electronic office equipment as well as toner/ink and refrigeration gases. Urban waste is mainly constituted by packaging.
For water consuming goods, the waste product is the waste water, linked to water quality and for energy consuming products, the waste product are emissions, linked to climate change and ozone layer. Depending on the location of the accommodation, these impacts are more or less directly linked with biodiversity and environmental safety.

3.5 Consumption issues in the tourist accommodation service

In order to tackle the environmental impacts relating to consumption it was necessary to define how to measure consumption and which kind of consumption to consider. The two main types of consumption are effective or potential consumption.

Effective consumption depends on both the technical features of the elements and on their use. For example: the consumption of energy due to the use of a hair dryer depends on the power of the hair dryer and on the number of minutes which the hair dryer is used. It is clear that customer use is subjective. It is clear that it can vary greatly. It is also clear that in order to define effective consumption in a non discriminating way, many statistics from the different parts of Europe and from different accommodation service categories should be available for analysis.

Potential consumption , on the other hand, exclude behaviour to a greater degree, and mainly take into account only the technical features of the elements. Objective measure units guide potential consumption, the consumption which depends on technical features of the good and not on its use. These units are energy per minute, water per minute, weight or volume of waste per overnight.

The lack of reliable and comparable data on effective consumption of tourist accommodation does not allow fair and realistic effective consumption limits to be set. The only way now to set limits which may be evaluated and quantified are those based on potential consumption.

Summarizing:

- effective consumption = per overnight stay = needs a lot of statistical data which is missing at present
- potential consumption = per time, m² or weight = can rely on legislation, can help establish statistical data for future analyses on effective consumption = objective consumption.

3.6 Conclusions

The analysis of the environmental impacts of tourist accommodation services confirmed that the lodging service has most of the environmental impacts. These are concentrated in the three main components "room", "reception/administration" and "common services", and they are very similar among them.
Three quarters of the environmental impacts of all the lodging services with all their elements are linked to:

- consumption of short term non durable goods (and their end as waste)
- consumption of energy
- consumption of water

As was said in Chapter 2, these results show that lodging is a suitable product group not only from the standpoint of legislation and standard setting initiatives, but also, from an environmental point of view.
Having set the system boundaries of the lodging service, the criteria will relate in great detail to those elements, as the way to achieve the best environmental improvements.

The life cycle phase which most influences potential impacts is the purchase phase, which determines the kind of good is present to be used in the accommodation, nevertheless, the use and the waste management phases have a primary importance as well.

In conclusion the following observations can be made:

- The quantity of the environmental impacts directly depends on the quantity of goods, of their environmental quality and their specific consumption of water and waste by use.

- Consequently the European Flower shall aim
  - to the reduction of the consumption of articles which end in urban and/or hazardous waste
  - to the reduction of the consumption of water and energy when providing the services and when using the provided services

- potential consumption shall be measured instead of effective consumption, which is dependent on data which is not available to this day, in order to not be discriminating and to begin data collection on effective consumption for the next criteria revision.

The evaluation of existing legislation was an integral part of the criteria development. The following chapter briefly summarises , in a non exhaustive way, the general lines of EU environmental policy on the main environmental impact areas of the tourist accommodation service.

4 EUROPEAN LEGISLATION CONSIDERATIONS

A deep analysis of the main existing European Directives and documents on its environmental policy was carried out. 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. Further details may be found in the annex documents relating to the criteria development from the Second to the Final Draft Criteria.

The environmental policy of the European Union, as stated in the Treaty, is to

- 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 promotion of adhesion to eco-labelled products and to EMS is one of the instruments of the European Union to implement steps in this direction.

In the Fifth Action Plan, “Towards Sustainability” 1992-2000, the target sectors were identified. 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 in the condition of the environment, which is indivisibly “our” environment. It proposes five priority avenues of strategic action: improving the implementation of existing legislation; integrating environmental concerns into other policies; working closer with the market; empowering people as private citizens and helping them to change behaviour; and taking account of 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.

Presently European energy consumption comes for a 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 a 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

4.1 The energy policy in the EU

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

Directive 92/75/EEC10, 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. Labels on energy efficiency of electrical appliances are mainly two and reference made to them by the EU eco-label on tourist accommodation lines the Eco-label with European policy and Regulation requirements.
Directive 93/76/CEE 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.

Energy Label
Directive 92/75/EEC11 establishes a classification of the efficiency of electrical appliances with respect to standard efficiency. Energy classes A to G indicate an **index of efficiency** in percentage according to the following ratio:

Energy Class: Energy needed to do the work / Average standard efficiency

Efficiency is maximum for Class A products and decreases to Class G.

Energy Star
Decision 2001/469 CE 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 Community on the Co-ordination of Energy Efficient labelling programmes 99/0135 (CNS), signed in Brussels the 1st July 1999.

[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] ibid

Energy from Renewable Sources (RES)
Directive 2001/77/CE fixes the level of energy coming from renewable sources by the year 2010 as a 12% of the total energy consumption, and in particular, the electricity coming from renewable resources at a 22% of the electricity consumption.
All EC governments are involved in research and implementation of energy from renewable sources (program **ALTENER**). Research and Development is the prerequisite to sustainable development and the present eco-label intends to promote the demand for RES, in the attempt to make RES economically competitive to fossil fuels is the aim.

4.2 The water policy in the EU

The Treaty of the European Union at Article 174 already states the belief in prudent and rational use of natural resources, and 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 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.
From the EU report on Water there is the awareness stated in CE Directives that "a**ll 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 environment**[12]**".**

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. 47, which does not allow eco-labelling to an accommodation which does not treat waste waters.

The newest document which tackles EU water policy is Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy[13].

It states the following main points:

- 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.

[12] Directives 91/271/CE ; 91/171/CE modified by directive 98/15/CE ,

[13] *Official Journal L 327 , 22/12/2000 P. 0001 - 0073*

In terms of implementation of actions which shall achieve the desired results, the Community's position is that it 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.

In this sense, the criteria in the Second Draft aimed at water saving which foresee extra points if they are applied in *arid* areas or areas where the resident population experiences water shortages, or criteria n. 26, which does not allow sport or wellness facilities in the above stated areas, intend to ask the National Competent Authorities to be designated as sensitive and vulnerable areas, according to appropriate assessments.

4.3 Chemical substances in the EU

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, adopted on 13 February 2001, addresses the shortcomings of the current system. This relates mainly to the following legislation:
- Directive on the Classification, Packaging and Labelling of Dangerous Substances
- Directive on the Classification, Packaging and Labelling of Dangerous Preparations
- Regulation on the Evaluation and Control of the Risks of Existing Substances
- Directive on Restrictions on the Marketing and Use of certain Dangerous Substances and Preparations

Consequences of this paper are not directly found in the criteria of this Eco-label for tourist accommodation, 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 "tourist accommodation"; what has been righteously requested is that staff be careful to appropriately dose detergents, in order to avoid excessive quantities.

4.4 Waste management in the EU

Council Directive 94/62/EC of 15 December 1994 on packaging and packaging waste [Official Journal L 365, 31.12.1994].
The Member States must 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 waste [COM (2001) 729 final].
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.

In terms of criteria requirement, in the case of the Eco-label on tourist accommodation, it may be 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 States[14].

[14] O J *L 182 , 16/07/1999 P. 0001 – 0019*

5 Analysis of environmental improvement from criteria

Eco-labelling is a voluntary instrument of implementation of high environmental performance in order to reduce consumption and acquire visibility to a sensitive market. One of the scopes of eco-labelling is to reduce the environmental impacts of goods and services through the promotion of market driven environmentally friendly products.

As an instrument of implementation of European environmental policies, the criteria were developed coherently with these policies, as briefly presented in the previous chapter.

In this chapter the environmental improvements from the criteria will be concisely shown.

In the field of tourism, less than 1% of the European accommodation structures are eco-labelled. The improvement of eco-labelling in general, is that of promoting the technology and the awareness to achieve higher environmental performance. The improvement of the environmental performance resulting from compliance with the EU eco-label criteria for tourist accommodation is three-fold. Firstly the aims of the criteria are directed toward significantly reducing the environmental impacts due to energy, water and chemical consumption and waste production. Secondly the criteria strive to increase awareness and education of both guest and staff toward environmental issues, and thirdly, this eco-label promotes synergies with other eco-labelled products and environmental management systems, such as EMAS.

The scheme has been developed according to EU environmental policy in all the above stated fields, and the environmental improvement is not only a result of the compliance with each criterion, but should be looked at while considering the scheme in its entirety, from the limit to the management criteria, from the push toward better technology to the promotion of more sustainable guest and staff behaviour.
The EU Eco-label on tourist accommodation refers to the tertiary sector, which is very rapidly expanding. Studies show that 40% of energy is used in the residential/ tertiary sectors, and that in general, a very large potential for energy savings exists in the residential and tertiary sectors. More in detail, the energy demand in 2000 was distributed allowing a 31% for transport, 28% for the industry and a 41% for the residential and tertiary[15] activities. This means that all the energy saving measures applying to tourist accommodation (which is a residential category) may potentially be extended to apply for situations which account for a major part of the energy consumption on Europe.
From a study published on COM(2000)769 of 29 November 2000, the energy consumption by end use in EU tertiary buildings (shops and offices) is as follows:

- Cooling 4%
- Space heating 52%
- Lighting 14%
- Cooking 5%
- Water heating 9%
- Other 16% (office equipment)

while energy consumption by end use in EU residential buildings accounts for the following consumption percentages:

[15] Tertiary includes offices, wholesale and retail trade, hotels, restaurants, schools, hospitals, sports halls, indoor swimming pools, etc. but excludes industrial buildings. Brussels, 11.5.2001
COM(2001) 226 final. Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the energy performance of buildings

- Space heating 57%
- Electric Appliances 11%
- Cooking 7%
- Water heating 25%.

The criteria in the EU eco-label for the product group tourist accommodation as defined above take into consideration all the above stated issues except cooking. It can be seen how compliance with the EU eco-label criteria may significantly reduce energy consumption.

With respect to specific components present in tourist accommodation, the document reported on the following:

Boilers. Ten million EU residential boilers are older than 20 years. Their replacement would save 5% of the heating energy

Lighting. Lighting consumes 14% of total energy in the tertiary sector. 30-50% savings could be achieved with the use of the most efficient components, control systems, integration of day-lighting and other technologies.

Cooling. Energy use for air-conditioning will double by 2020. 25% could be saved through air-conditioning equipment minimum efficiency requirements

Green energy generation
On-site renewables, cogeneration of heat and power, connection to district heating/cooling and heat pumps also have savings potential.

Bioclimatic design
Active and passive solar design and systems, improved day-lighting and natural cooling can reduce energy demand by up to 60%.

The criteria tackle all the above stated issues, including bioclimatic design and insulation of both windows and the structure, in order that the old buildings may increase their energy conservation performance (for both heat and cooling). In general, the total energy used in new dwellings is 60 % of that used in old dwellings, showing that by addressing all the above stated issues the criteria have a very high potential for improvement of the environmental performance of the product group.

It is clearly seen that these measures involve new technology with better environmental performance, such as new efficient boilers and energy saving light bulbs. The same can be said for water saving devices. It is also true, as was mentioned above, that behaviour is another important influencing factor of environmental performance. The criteria requiring staff training on environmental issues serve this purpose. Trained staff, in turn, shall not only enhance the environmental performance of the accommodation, but shall also play an important role in raising consumer awareness and satisfaction. It is important to keep in mind that the eco-label intends to influence the market toward environmental respectful products, therefore consumer satisfaction is important and in the accommodation service the behaviour of lead and staff is part of the image and impact of the eco-label.
A desired improvement of the eco-label awarded to the accommodation service is also that of influencing guest behaviour after his vacation into his own every day life.

6 Development of the criteria

For the development of the ecological criteria for the EU eco-label on tourist accommodation the first task was to identify those components responsible for the main environmental impacts. Due to the vastness of the possible components and due to the need that the criteria be applicable throughout the European territory, specific institutional reference documents were sought as guidance on which to base the criteria, together with the analysis of the existing eco-labels. This research had the scope of identifying those fields where the criteria had the possibility to most significantly influence the negative environmental impacts of the product group.

Class A components, included within the system boundaries of the product group, were identified in greater detail than the Class B extra-lodging service components. Of each main component the main environmental impact was identified and consequently the main influencing factor. This allowed to have an idea of which type of criterion would be most effective in improving the environmental performance of the accommodation service (see below).

In concretely expressing the criteria it was considered that the criteria needed to have the following characteristics: they needed first of all to be effective from an environmental point of view, to not undermine the fitness for use of the product group, not be discriminating to any applicant, be easy to put into action, produce measurable results, permit an easy verification system (documentation, on-site verification), and imply low costs for Small Medium Enterprises.

6.1 Aims of the criteria

According to the environmental impacts identified within the product group analysis (Chapter 2) and to EU environmental policy, it was identified that the criteria would be mainly aimed at:

- reducing the quantity of energy used
- reducing the quantity water used
- reducing the quantity of chemicals used
- reducing the quantity of waste produced

and also be aimed at:

- improving the quality of the energy used
- improving the quality of the water used
- improving the quality of the chemical substances used
- improving the quality of the waste produced

In particular, improving the quality of the energy used means to promote the use of renewable resources of energy, improving the quality of water means to promote the use of less treated water when possible, because treatment implies the use of chemicals having negative impacts on the environment, improving the quality of chemicals means to avoid the use of some substances which are particularly hazardous, and improving the quality of waste means to separate waste as much as possible.
In addition to the four main areas listed above, there are other general environmental objectives which include:

- Raising the awareness and promoting the environmentally friendly behaviour of staff and guests.

- Collecting data in order to create a data base on effective consumption, inexistent up to today, for future criteria development.

- Promoting synergies with the EMAS regulation for continuous improvement in the environmental quality of the service provided.

6.2 Types of criteria

From a technical point of view, the criteria in this eco-label scheme are of three types: **limit, measure** and **management**. These different types are due to the presence of two main factors influencing the environmental impacts: technology and behaviour. Behaviour as an influencing factor depends on the fact that this product group is a service, and therefore entails human action. The actors involved, whose behaviour is an influencing factor, are mainly two, guests and staff.
In addition, from an administrative point of view, each criterion has two levels of requirement: it can be mandatory or optional, depending on whether compliance to the criterion is obligatory or can be object of the accommodation manager's choice, according to his regional, structural and infrastructural possibilities. The characteristics of the mandatory and optional criteria will be discussed in the second part of this report, as they are more specific of the Final Draft Commission Decision.
As follows the characteristic of the different types of criteria from a technical point of view is described.

The limit criteria fix potential limit consumption of energy or water or limit the presence of some chemical compound which has main environmental impacts. Limit criteria have the role of setting a quantitative border to respect, and to set standards which allow the definition of a "better than" situation between the EU labelled and the non labelled accommodation.

Due to the lack of reliable, comparable and homogeneous data on effective consumption of energy, water, chemicals and on the production of waste in the different tourist accommodations, the limit criteria in this draft commission decision consider *potential* consumption, rather than effective consumption. Because they need to consider specific "consuming" elements, the limit criteria in this scheme are directed toward specific situations instead of setting an "all inclusive consumption limit".

In order to set potential consumption limits, first the main components responsible for the environmental impacts deriving from potential consumption of energy, water, chemicals and waste were identified and the most environmentally friendly performances were investigated, keeping into consideration the characteristics of the criteria, as stated above.

Measure criteria indicate actions which need to be performed in order to achieve the desired environmental effect. They may be similar to limit criteria but do not fix a limit. When it is impossible to identify the limits of the end result, for the reasons stated above related to lack of data, the measure criteria indicate the steps which can lead to achieve the same goal.

Measure criteria have the role of insuring that the strategy set by the management criteria is carried out.

Management criteria refer to the general conditions for the measure and limit criteria to be performed. They can be thought of as "enabling criteria", setting the policy and the intent of the environmental regulation. Management criteria have the role of identifying the environmental strategy of the tourist accommodation and coordinating the other two types of criteria. Their goal is to establish a method and to integrate all other criteria into a logical and organic pattern and to set a data collection/ monitoring system which allows the accommodation structure to control its

environmental performance. These criteria include monitoring of environmental consumption figures (water, energy, waste), training staff and information to guests.

The limit and measure criteria differentiates the eco-label from an purely management scheme. These two types of criteria describe a required situation and performance level which other environmental management schemes (EMS such as EMAS or ISO 14001) leave to the discretion of the applicant.

6.3 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 and which were presented and agreed upon in the AHWG meetings, which are as follows.

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 2000/1980 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.

In Part II of this report, the main features of the Final Draft Commission Decision will be described.

PART II

EU ECO-LABEL CRITERIA

7 TOWARDS FINAL DRAFT COMMISSION DECISION

After many internal drafts, four AHWG meetings and two EUEB meetings and relative feedbacks, the actual draft Commission Decision is of the 1st October 2002 is the final document which shall be considered in this report. Further changes will probably occur, which will lead to the final draft Commission Decision.
The steps and changes which led to the draft of the 7 October shall be considered in this chapter.
The criteria should be valid five years, from 2003 to 2008.

7.1 Framework of the Final Draft Commission Decision

The Final Draft Commission Decision has, as the other EU eco-label schemes, an initial framework section stating the aims of the criteria and laying down the basic characteristics of the criteria.

The aims of the criteria are coherent with those delineated in the initial methodological section. Specifically, in the Final Draft document they are reported as follows:

"FRAMEWORK
The aims of the criteria
The criteria aim to limit the main environmental impacts from the three phases of the service's life cycle (purchasing, provision of the service, waste). In particular they aim to:

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

In the next chapter 6.2, the general scheme of the criteria will be briefly described, then basic characteristic of the criteria are described in chapter 6.3, as they are specific to this product group, and deserve a more detailed description.

7.2 General scheme of the Final Draft Commission Decision Criteria

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 tourist accommodation. In the next sections the structure of the criteria shall be explained in detail. Here it will be said briefly that it is the first time that the EU eco-label sees optional criteria, although they are common in the existing eco-label schemes for tourist accommodation. 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 tourist accommodation in order to obtain the EU eco-label.

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.

In the Final Draft Commission Decision, the criteria scheme is described as follows:

"CRITERIA

The criteria are divided into two main sections, the mandatory criteria and the optional criteria. All the criteria in the mandatory section must be fulfilled, if applicable (for example unless local or national legislation makes it impossible). If it is not possible to fulfil a mandatory criterion, the applicant shall explain why this is the case. The criteria in the optional section need to be fulfilled according to the requirements set out in the scoring system."

7.3 Profiles of the Criteria in the Final Draft Commission Decision

In this paragraph, the profile of the mandatory and optional criteria will be described in detail, since they are very particular to this product group.

7.3.1 Profile of the mandatory criteria

In Chapter 5.3 the overall requirements of the criteria were identified; with respect to those 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 3 describes the features of the mandatory criteria as described above.

Table 3- Profiles 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

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 accommodation, 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 tourist accommodation has no garden.

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.

7.3.2 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 in Chapter 5.3 and in Table 3, according to a different scale, as follows.

First of all, the requirements of the EU criteria were analysed in order to assess a simplification of the scheme which would be used for the assignment of the score. The aim of this analysis was to identify those requirements which really differentiate the criteria one from the another. Table 4 reports the requirements which vary in the optional criteria.

Table 4- 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 = low investment 1 = high 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 2000/1980 and by the discussions among stakeholders of the AHWG meetings.

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.

Table 5 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 5- Possible combinations which can be attributed to each criterion.

Criteria	Environmental effectiveness	Weighted value for env. eff.	Consumer perception	Weighted value for cons. percep.	Technical/economical feasibility	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. 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, and as resulted from many reactions of participants to the Third AHWG meeting, as well as to pursue only the main environmental impact, as agreed at the Second AHWG meeting, 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 5 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.

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.

Compliance with the optional criteria is required until the accommodation has reached a certain score, which for a basic lodging service is 16,5 points. One point needs to be added if the accommodation offers food services (including breakfast), one point if it offers fitness facilities (such as swimming pool) and one point if it offers green areas (gardens under the ownership or direct management of the accommodation). The maximum total number of points which are required is 19,5. It is our belief that the score system has been developed in such a way as to allow the accommodations seeking high environmental performance to achieve certification without any particular impediment.

7.4 Other characteristic of both mandatory and optional criteria in the Final Draft Commission Decision

In addition to the characteristics reported in Part I, which provided the methodological framework for the criteria development, and the specific traits of the mandatory and optional criteria in this Final Draft Commission Decision, there are other general features of both the mandatory and optional criteria, which are illustrated below. Some are implied as a part of the Regulation, although they had been at first specifically stated.

Compliance with the law of the accommodation structure

As a requirement of Regulation, the criteria should lead to measurable results. A first attempt in the second draft to define requirements for landscape, biodiversity but the discussions showed that neither of these topics has been sufficiently standardised at a European level to allow the formulation of a criterion which could me measurable. These elements are automatically taken into consideration by the requirement of the Regulation 1980/2000 that the accommodation does comply with the law. This takes into consideration also the safety measures of the building and of all equipment used within the accommodation structure for which individual criteria would be impossible and redundant. This is also true of chemicals and detergents which can be used. The only realm of action which the accommodation eco-label criteria can make a difference is in the quantity used, which should be minimal.

No banning of any particular substance

Since the Second Draft, no particular substance was banned by any criterion. This is true for detergents and disinfectants, and for any other material which is sometimes present in other eco-labels, such as PVC or plastic in general or wood. It is our belief that it is not the role of an eco-label on tourist accommodation to pick on a particular material or substance, because this action should be the results of a specific comparative study on that substance. Rather, the effort to reduce the quantity of substances used, both natural and synthetic, is one of the main aims of the criteria.

7.5 Selectivity of the criteria

According to the Regulation, the criteria must be designed to have the highest potential reduction of the negative environmental impacts.
Qualitatively, the criteria are so designed as to improve the environmental performance of the tourist accommodation in all environmental influencing factors: technical features of equipment, staff and guest awareness and behaviour, and even influence awareness and behaviour of local administration, since some criteria depend on the local administration for their effectiveness (such as for solid and

water waste management, for example), as it is with all issues concerning the environmental impact of activities similar to household taking place within an urban or otherwise settled environment..
At the same time, the scope of the Eco-label scheme is to reduce environmental impacts by being applied to a certain number of product groups.

The criteria have been developed keeping in mind that the EU Eco-label addresses the best 5 – 30% of the target group. It must be kept in mind that the EU Eco-label, as all Type I eco-labels, is selective. For this reason there are limit criteria and in general, the entire scheme is demanding.
The selectivity has been assured by developing the criteria starting from criteria of selective existing eco-labels which already assure good performances.
It is important to remember that environmental excellence sought by the Regulation and scope of the EU Eco-label, is given to the criteria in their entirety, taking into consideration the limit, measure and management criteria together, as well as the communication of the actions taken.

7.6 Synergies with existing Type I eco-labels, EMAS and ISO 14001

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 tourist accommodations that have already an eco-label which complies with the standards ISO 14024 (type I eco-labelling).

Synergies with EMAS and ISO 14001

As it has been seen in Chapter 6, 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 coordinated framework of deadlines and measures.
This is a crucial aspect for improvement, in any field.
The management criteria presented in the EU eco-label tackle in general the existence of an environmental policy of the accommodation, which sets goals for its environmental behaviour, and an action plan, which sets a calendar for actions.
EMAS (Eco-Management and Audit Scheme) is the EU 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 guaranted by means of the recognition of the management criteria. In fact, tourist accommodations which are certified with EMAS or ISO 14001 automatically fulfil all management criteria foreseen in the EU eco-label.

Furthermore, in the optional criteria a specific criterion recognises the value of the EMAS certification awarding points to those structures registered with EMAS, and another criterion promotes the choice of suppliers with an EMAS registration.

7.7 Verification procedures in the Final Draft Commission Decision

The main verification measures include documentation, self declaration of the accommodation manager, declarations of non-use and on-site inspections.

These declarations and documentation vary according to the phase of the life cycle to which the criterion refers. The verification of criteria influencing the purchase phase mainly involve invoices and manufacturer documentation. The verification of criteria influencing the use phase, involve self declarations from the accommodation manager attesting the required behaviour from staff (also through training programs) and the efforts conducted in building guest awareness (mainly through communication of positive behaviour). Verification of criteria influencing the waste management phase mainly include documentation from waste management service providers.

In the Final Draft Commission Decision the Assessment and verification requirements read as follows:

"Assessment and verification requirements
The specific assessment and verification requirements are indicated within each criterion.
Where the applicant is required to provide declarations, documentation, analyses, test reports, or other evidence to show compliance with the criteria, it is understood that these may originate from the applicant and/or his supplier(s) and/or their supplier(s), et cetera, as appropriate.
Where appropriate, Competent Bodies may require supporting documentation and may carry out independent verifications.
The Competent Bodies are recommended to take into account the implementation of recognised environmental management schemes, such as EMAS or ISO 14001, when assessing applications and monitoring compliance with the criteria (*note: it is not required to implement such management schemes.*)."

In view of the fact that most accommodation are Small Medium Enterprises, and often Micro enterprises, as it can be seen from the paragraph above, the verification procedures have been kept as simple and as inexpensive as possible.

There are no specific laboratory test requirements, as for the eco-labels on products.

8 Cost and benefit considerations

8.1 Economical and technical benefits

The implementation of the criteria involve an investment of time and, sometimes, money, depending on the performances of the applicant at the time of application. The criteria have been developed in order not to be discriminating to any applicant, nor to the environment, therefore it should be considered that their scope is not to praise the state of the art of the majority of accommodation but to praise environmental excellence, which requires an effort.

The investments, however, intend to have a general payback period from five to eight years, depending on the national fees of natural resources (water, energy, waste taxes, goods), size and occupancy rates of the accommodation structure.

Technical feasibility of the criteria

None of the mandatory criteria require purchase of equipment which cannot be found on the European market, such as energy efficient light bulbs or waste baskets. It has been taken into consideration that existing equipment may not be completely substituted, therefore some criteria of the final draft as of 7th October 2002 apply to equipment purchased after application to the EU eco-label, whereas extra prompt measures are valued in the optional section with points. It is true that investments which save resources may be convenient from the very beginning. For example, the heat pump has an estimated pay back period for an average use of five years.

A high efficiency condensation boiler is required when bought after application to the EU eco-label. It may cost from 30 to 40% more than other boilers, but may save up to 15% the energy of a less efficient boiler, therefore, complying with the criterion takes into consideration environmental and economical sustainability.

Bioclimatic architecture for new structures, saves a lot of energy through higher insulation, positioning of the day and night rooms, use of natural air currents and general attention to well being of the inhabitant. It may require more thinking and specialised professionals at the beginning but it leads to a better end result which allows to save natural resource and money.

Laws regarding energy efficiency of buildings have already been issued and certainly new buildings tend to be more energy efficient than the old. From literature, the following estimates can be reported. On building efficiency as a whole, also referred to as global savings potential, as regards energy in buildings that is used for heating, hot water, air-conditioning or lighting purposes has been estimated for new buildings. A savings[16] potential of around 22% of present consumption is estimated to exist and can be realised by applying efficient insulation and boiler to the building, which should be much more diffuse than today by the year 2010.

Saving potential in lighting has been demonstrated in a recently launched EU Green Light Programme showing that most of the energy savings in lighting are highly cost-effective. It is enough to realise that an incandescent light bulb has a lumen output of 10 lumen/watt compared with the 55 lumen/watt output of an energy saving light bulb. This means consuming 5 times less electricity.

[16] In this context, savings potential is generally defined in terms of investments in energy-efficient technology having a pay-back period of eight years or less, allowing a high rate of return compared to alternative investments, including investments in energy production.

Air conditioning is a rapidly growing consumption activity in the residential and tertiary sectors. The total consumption of energy for air-conditioning, which is about 3 Mtoe, or 0,7% of total final energy consumption in the two sectors combined, will double by 2020 if current trends persist. The cost-effective savings potential is about 25% by applying high efficiency air conditioners.

Other benefits

As stated by Regulation 1980/2000, the EU eco-label intends to increase market driven environmental performance, therefore, the eco-label is a marketing tool. The labelled accommodation should benefit from consumer perception and awareness of environmentally friendly measures. The Fematour study reported that environmental concerns were growing in Europe and could become an important part of a consumer decision for his accommodation. Recent studies, conducted in Germany, for example, and shown in the "German Reiseanalyse 2002" report , show that half of all Germans are looking for high environmental quality. So 50% of Germans want to take their holidays only where the environment is still intact / unspoiled. With special respect to tourist accommodation the report shows that 25 million Germans think that it is particularly important to find environmentally-friendly accommodation, and another 12 million would welcome it if the catalogues of tour operators, accommodation operators and destinations were to clearly indicate offers which are particularly environmentally-friendly.

For this reason many criteria are directed toward consumer perception, so that the consumer may find some visible signs of environmental commitment, so as to satisfy his choice for the accommodation.

Other benefits resulting from the application of the EU eco-label are connected to the social aspects of staff training and keener overall management, which can only result in a higher quality of the service in general.

These benefits are very closely linked to consumer communication, which is described in further detail in the next section.

8.2 Social benefits linked to communication

Communication to customers is the set of actions and measures which concur to make staff and customers understand what the eco-labelled tourist accommodation is doing to reduce the negative environmental impacts which any lodging service has, including individual homes, on the environment.

In the communication to the staff, training programs are essential in order to keep staff updated with the latest innovative technologies and on the environmental policy of the accommodation structure.

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

8.2.1 Direct communication

Direct communication is the communication which the accommodation 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 room. As is stated on the Regulation, these 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 :

1. the existence of an eco-label for tourist accommodation,
2. what the EU eco-label entails, its aims and measures,
3. 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 tourist accommodation 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 sensitize the customer in general on the EU flower all over Europe.

It has been very often said that the customer of a tourist accommodation 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 accommodation. 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 Second Draft, are used to promote the tourist accommodation

Furthermore, as should be auspicated, it may bring him to adopt an environmentally friendly attitude at home, if he did not have one, and choose eco-labelled products afterwards.

8.2.2 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 accommodation structure. It is important for consumer perception that he understands what he sees in relation to the adhesion of the tourist accommodation to an environmental label.

For this reason the main extra lodging services were added to the EU eco-label criteria, so that the consumer could see in the entire accommodation grounds an environmentally friendly management and measures.

Indirect communication is carried out also through the attitude of lead and staff toward criteria requirement, which clearly shows the importance of regular training, as required in the management section.

9 FEE SYSTEM

In this chapter the current proposal for a fee system for the Community eco-label for tourist accommodation is examined, taking into consideration that 95% of the businesses in this field, and therefore possible applicants, are Small and Medium Enterprises[17] or even Micro enterprises.
The fee system is laid down by three official documents which give the nature and the entity of the fees and identify the conditions for discounts.
In the following paragraphs these documents are examined and in the end the proposal is made.

9.1 Documents regulating the framework of the fee system of the EU Eco-label

The fee system of the EU eco-label is regulated by three main documents: by Regulation 1980/2000, in articles 12, 17 and Annex V, by Decision 1999/468/EC which states how the Commission can go about implementing its powers, and by Decision 2000/728/CE, establishing the application and annual fees of the EU Eco-label.
The above stated documents shall be examined in order to present the framework regulating the proposed fee system for the EU eco-label on tourist accommodation.

9.1.1 Regulation 1980/2000

Article 12 states that the eco-label is subject to a fee.
Costs and fees
Every application for the award of an eco-label shall be subject to payment of a fee relating to the costs of processing the application.
The use of the eco-label shall entail payment of an annual fee by the applicant.
The level of application and annual fees shall be established in accordance with Annex V and under the procedure laid down in Article 17.

ANNEX V specifies which are the elements constituting payment and sets the conditions for some reductions on the fee.
Fees
1. Application fees
An application for the award of an eco-label will be subject to payment of a fee relating to the costs of processing the application. A minimum and a maximum fee will be fixed.
In the case of SMEs and also product manufacturers as well as service providers of developing countries the application fee will be reduced by at least 25 %.
2. Annual fees
Each applicant who has been awarded an eco-label will pay an annual fee for the use of the label to the competent body which has awarded the label.
The period covered by the fee will begin with the date of the award of the eco-label to the applicant.
The annual fee will be calculated in relation to the annual volume of sales within the Community of the product awarded the eco-label. A minimum and a maximum fee will be fixed.
In the case of SMEs(2) and also product manufacturers as well as service providers of developing countries, the annual fees will be reduced by at least 25 %.
Applicants who have already received certification under EMAS or ISO 14001 may be granted

[17] SMEs as defined in Commission Recommendation 96/280/EC (OJ L 107, 30.4.1996, p. 4).

additional reductions in the annual fee.
Further fee reductions may, where appropriate, be granted pursuant to the provisions of Article 17.
3. Costs for testing and verification
Neither the application fee nor the annual fee will include any cost towards testing and verification which may be necessary for products which are the subject of applications. Applicants will meet the cost of such testing and verification themselves.
In drawing up the assessment and verification requirements the objective of keeping costs to a strict minimum must be observed. This is particularly important in order to facilitate participation by SMEs in the Community eco-label system and thus to contribute to the wider dissemination of the system.

Article 17 lays the procedure for approval of a draft proposal:
Committee procedure
1. The Commission shall be assisted by a committee.
2. Where reference is made to this Article, Articles 5 and 7 of Decision 1999/468/EC shall apply, having regard to the provisions of Article 8 thereof.
The period laid down in Article 5(6) of Decision 1999/468/EC shall be set at three months.
3. The Committee shall adopt its rules of procedure.

From the Regulation it is understood that the elements for payment of the EU eco-label are three: application fee, annual fee and verification and testing fee, and that a draft proposal shall be made by the Commission and ratified according to the document below.

9.1.2 Commission Decision 2000/728/EC[18]

Commission Decision 2000/728/CE establishes the application and annual fees of the Community Eco-label and sets definite values to the fees which are identified in Annex V of Regulation 1980/2000. It is drawn in accordance with Decision 1999/468/EC.

As was stated by Art.12 of the Regulation, the elements of payment are the following, which are briefly discussed as follows:

1 - Application fee
The application fee is paid to the Competent Body, relating to the costs of processing the application. It has a minimum value of € 300 and a maximum value of € 1300.
There is a 25% reduction for SMEs as defined in Commission Recommendation 96/280/EC[19].

2- Annual fee
The annual fee, also paid to the Competent Body, is for the use of the label. The annual fee is a percentage of the annual volume of sales within the European territory of the eco-labelled product group. The figures for the annual volume of sales, when the product is a service, are based on the delivery price.
It has a minimum value of € 500 and a maximum value of € 25.000

Competent Bodies may grant reductions of up to 25 % for up to the first three applicants in each Member State that are awarded the Eco-label for a given product group.
All of the above reductions shall be cumulative and shall also apply to the minimum and maximum annual fee, but shall not exceed in total 50 %.

[18] Official Journal L 293 , 22/11/2000 P. 0018 - 0019
[19] Commission Recommandation 96/280/EC (OJ L 107, 30.4.1996, p. 4).

3- Verification fee
In the above stated fees, any additional test needed in order to prove compliance to a criterion is not included. This kind of expense lies on the applicant. The verification fee for the product group tourist accommodation should be zero, in that there are no specific laboratory tests which need to be conducted in order to show compliance to the criteria, which is a happening of goods produces in industries.
In the case of the service lodging, this voice would include any expense requested by a supplier of goods or services to release additional information on its environmental behaviour or on the characteristics of its products. However, this is a very improbable happening.

From the above stated documents the following table can be drawn regarding the fee system which regulates the EU eco-label.

Table 6- Fee system for the EU eco-label for tourist accommodation as per Regulation 1980/2000 and Commission Decision 2000/728.

Element of payment	Range (in euro)	Reduction for SME	Reduction for EMAS registered and/or ISO 14001 certified[20]	Reduction for first three applicants	Total reduction
Application fee	300 - 1300	25%			25%
Annual fee	0, 15 % of annual volume of sales 500 - 25000	25%	15%	25 %	Reductions are cumulative and apply to both minimum and maximum fee but cannot exceed 50%
Verification tests	No set value	-	-		

The reductions relative to applicants from developing countries has not been taken into consideration since the service lodging has to take place in the European Union.
It must be remembered that the application fee is paid only once.
Competent Bodies may grant reductions of up to 25 % for up to the first three applicants in each Member State that are awarded the Eco-label for a given product group.
All of the above reductions shall be cumulative and shall also apply to the minimum and maximum annual fee, but shall not exceed in total 50 %.

It can be seen that for the product group lodging in tourist accommodation, the delivery price and the annual fee need to be specified, as shall be done in the following paragraph.

[20] This reduction shall be subject to the condition that the applicant explicitly commits itself in its environmental policy to ensure full compliance of its Eco-labelled products with the Eco-label criteria throughout the period of validity of the contract and that this commitment is appropriately incorporated into the detailed environmental objectives. Those applicants with ISO 14001 shall demonstrate annually the implementation of this commitment. Those with EMAS shall forward a copy of their annually verified environmental statement.

9.2 Proposed fee system for the EU eco-label for tourist accommodation

According to the documents setting the fee system for the EU eco-label presented above, as follows is the proposed fee system for the EU eco-label on tourist accommodation.

9.2.1 Application fee

The application fee could be established at a minimum value lower than stated by Commission Decision 2000/728/CE, € 300.
A reduction of a 75% should be applied if the applicant is a micro enterprise or an alpine hut, and have the regular 25% reduction if it is an SME, as defined in Commission Recommendation 96/280/EC[21] .

9.2.2 Annual Fee

The annual fee is a percentage of the annual volume of sales relative to the product group, which, in case of a service, is based on the delivery price.
Since the vast majority of the tourist accommodation enterprises are SME (over 95%- Hotrec and Eurostat, 1998) and a very good number of these are micro enterprises (about 94,5%- estimates form Eurostat 1998 data), it is proposed to lower the minimum annual fee to € 100, while keeping the maximum at € 25.000. In addition, the annual volume of sales shall be reduced by half: it shall be calculated by multiplying the delivery price by the number of overnight stays and reducing this product by 50%.

A reduction of 25% should be applied if the applicant is a SME, as defined in Commission Recommendation 96/280/EC[22].
According to Commission Decision 2000/728/CE , enterprises registered with Emas should be eligible for a 15% reduction of the annual fee.
These reductions are cumulative up to a maximum 50% reduction on the annual fee.

For the calculation of the annual fee, the delivery price first needs to be identified.

9.2.3 Identification of the Delivery Price

The delivery price, is the price of the eco-labelled product group: the lodging service in tourist accommodation.
The starting point for the identification of the delivery price is the product group definition
"The lodging service: the provision of sheltered overnight stay structured in rooms, with all their contents, including at least a bed fit for use, offered as main service to tourists behind a fee" [23]
This complies with the requirement of the EU Regulation 1980/2000 that the product group should have similar aims and be equivalent in use and consumer perception.

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[21] Commission Recommendation 96/280/EC (OJ L 107, 30.4.1996, p. 4): SME are enterprises with less than 250 workers and an Annual turnover of less than 40mil euros, or a global balance of less than 24mil euros.

[22] Commission Recommendation 96/280/EC (OJ L 107, 30.4.1996, p. 4): SME are enterprises with less than 250 workers and an Annual turnover of less than 40mil euros, or a global balance of less than 24mil euros

[23] Third Activity Report p. 3

The physical boundaries of the lodging service have been identified as:

- the room (bedroom area and private bathroom)
- the reception/administration area
- the common rooms (leisure, common sanitary facilities and connection premises, such as corridors).

For example, if the hotel has a swimming pool, the use of which is not charged extra, it means that the use of the swimming pool is included in the lodging activities. The same can be said for a walk in the accommodation premises if there is a garden, or the availability of a parking space for the guests' car, etc.
In fact, this is the very reason why criteria for Class B services were included, in order to consider services offered which were connected with the lodging service. These services are included in the "sheltered overnight stay" service, and when not charged extra, they are included in the minimum overnight stay fee, and are part of the delivery price.

Breakfast
The analysis of the official national regulations showed that breakfast is not required from a legislative point of view to all accommodation structures, and therefore it was taken out from the product group boundaries.
When the price of the overnight stay indicated to guests automatically includes breakfast two possibilities arise:

- if the guest has the opportunity not have nor pay for breakfast, then the price for the breakfast should be excluded from the delivery price,
- if the guest does not have the opportunity to exclude breakfast from the overnight stay fee, then the income from breakfast is to be considered as part of the delivery price for the lodging service.

Services not linked to the lodging service charged extra
Income deriving from services extra from the lodging activities which are charged separately from the baseline price for the overnight stay should not be considered within the delivery price. Such income could derive, for example, from baby sitting services, from access to sport or fitness facilities charged extra (lessons, massages), parking under custody, hairdresser or private laundry-repair service for guest clothes, etc.

Services directly linked with the lodging service charged extra
With the specific intent of keeping fees as low as possible, the services which are directly linked to the accommodation service but charged extra should not be included in the income deriving from labelled services. Such activities could be, for example, pay TV, room service, minibar expenses, etc.

The delivery price should be considered as the minimum fee paid by the guest for the overnight stay, including all the services which do not entail an extra charge, free from any additional facilities which depend upon his choice and are charged extra.

If there is more than one delivery price, the final delivery price shall be considered as the average fee paid by the guest for the overnight stay.

9.2.4 The annual volume of sales

In order to obtain the annual volume of sales, the delivery price needs to be multiplied by the number of overnight stays in one year.
This shall give the annual volume of sales deriving from the eco-labelled service.

This figure shall be multiplied by 0, 0015 in order to obtain the annual fee which a business should pay to the body responsible for the assignment of the eco-label.

The minimum annual fee is € 100 the maximum is € 25000 on which, as stated above, the following reductions could be envisaged.

Reductions
The reductions envisaged, as per Regulation, could be for SME and for EMAS registered enterprises.

Small Medium Enterprises
The Regulation and Commission Decision 2000/728/CE envisage reductions for SME of a 25%. The vast majority, over 95% (Hotrec, Eurostat) of tourist accommodations are SME therefore the proposal is to maintain this reduction.

EMAS certified enterprises: the reduction of 15% cumulative should be applied if the applicant is EMAS registered or ISO 14001 certified, under the conditions stated in Decision 2000/728/EC and reported in table 2.

These two reductions are cumulative and can add up with other reductions up to a maximum of 50%.

Verification of the volume of sales.
In order to verify the volume of sales, both the delivery price and the annual overnight stays need to be assessed.

The delivery price shall be proposed under justification by the accommodation and accepted by the Body responsible for the attribution of the eco-label.

The number of overnight stays in one year of the accommodation shall be those which the business needs to communicate to the appointed body in each region.

9.2.5 Special verification tests and procedures

For the product group tourist accommodation, no special laboratory tests are envisaged, but only requests of official documents stating a certain situation. Subsequent verification of the documents and of the state of the art is always possible from the body responsible for the attribution of the scheme.
If the request of a particular document may entail some expense, this may be equivalent to a laboratory tests for the industry, and the accommodation shall bear the expenses of such a request. However, usually the request of extra information to a producer or a dealer takes time and effort but no extra charge.
Table 7 summarises the proposed fee system for the eco-label on tourist accommodation.

Table 7 – The proposed fee system for the EU Eco-label on tourist accommodation

Element of payment	Fee (in euro)	Reduction for micro enterprises	Reduction for SME	Reduction for EMAS registered and/or ISO 14001 certified[24]	Reduction for first three applicants	Total reduction
Application fee	300	75%	25%			Up to 75%
Annual fee	0, 15 % of 50% of annual volume of sales 100 - 25000		25%	15%	25%	Reductions are cumulative. but cannot exceed 50%
Verification tests	-	-		-		

The reductions relative to applicants from developing countries has not been taken into consideration since the service lodging has to take place in the European Union.

It must be remembered that the application fee is paid only once.

[24] This reduction shall be subject to the condition that the applicant explicitly commits itself in its environmental policy to ensure full compliance of its Eco-labelled products with the Eco-label criteria throughout the period of validity of the contract and that this commitment is appropriately incorporated into the detailed environmental objectives. Those applicants with ISO 14001 shall demonstrate annually the implementation of this commitment. Those with EMAS shall forward a copy of their annually verified environmental statement.

10 FUTURE CRITERIA DEVELOPMENT

The Regulation 1980/2000 accounts for revision of the eco-label criteria to keep up with technological improvement and new findings in the fields of environmental sustainability.

The research conducted for the development of the first criteria document has already identified some possible issues for future criteria development which could not be tackled this time mainly due to the lack of reliable data, or due to the lack of official legislation.

Future criteria development on issues considered by the present criteria document

Effective consumption instead of potential consumption

Consumption limits could be established considering effective consumption instead of potential consumption, as has been done presently. As has been explained in Chapter 2, the lack of reliable, comparable data per accommodation structure and per offered services prevented the setting of effective consumption limits which could be considered European and non discriminating. The presence of a management criterion on consumption monitoring shall enable the setting of an initial data base on effective consumption and, ideally, shall allow to relate best performances to particular practices.

Energy efficiency relating to the entire building

As stated above, legislation is starting to define global saving potential of buildings. So far the legislation is not homogeneous and is relatively recent (mainly since 1996) making a criterion on global efficiency discriminating on a large scale and the study of the parameters such as to make European criteria a task in itself, which could not be deeply looked into in this first revision, also because, in order to make the legislation into criteria it should be closely connected with effective consumption, which was unavailable. The next revision may look more deeply into this issue, which is being applied now more widely by Member States and shall have a greater implementation within the next years.

Energy efficiency of industrial equipment

In the period of criteria development, industrial equipment was often referred to, as it is not considered specifically by the criteria, as opposed to household equipment. As has been stated, since there is no official European directive on the calculation of industrial equipment, and since the variability of industrial equipment is much higher than household, it was not possible this time to set any specific limit, nor was it possible to make a European wide survey of efficiency of industrial equipment. It is the hope that data collection from applicants shall be of help in establishing benchmarks which may allow to cover this issue within the next revision, or that normatives will be developed in this field.

Eco-labelled products

In the present draft the purchase of some eco-labelled products are specifically valued in the optional section. It could be that by the next revision there shall be a greater, more capillary availability of eco-labelled products on the so that the requirement could become mandatory.

Food

As organic food develops or any other agricultural policies and technologies change, food, which cannot be eco-labelled, could be covered in deeper details with more requirements.

Development of criteria in fields not covered by the present criteria document

Biodiversity and landscape integration

As stated above, the criteria need to give measurable results. For this reason biodiversity and landscape issues were not covered specifically. If current research on biodiversity indicators and on objective elements pertaining to landscape integration shall be adequately developed by the next revision, these issues could be weighed scientifically in the next revision.

Transportation

This draft only refers to information given to guests as to how to reach the accommodation through public transport and the provision of bicycles. The next revision may look deeper into this issue, according to the new technological developments in fuels and infrastructure management of public transport. Special praise of accommodations promoting the use of soft transport should be actively sought, as often tourist accommodation structures do through integrated public transport tickets offered to their guests.

Social criteria

As the integration policies acquire greater articulation, and as a result of a possible widening of the scope of “environmental” criteria, social criteria may come to be included in this product group, where personal contact is in a central position.

Criteria structure

According to changes in best available technology and/or in European environmental policy, some criteria which are now optional may become mandatory, such as to make the eco-label scheme always updated with the current indications.

Additional criteria

Due to new research and to the possible different implementation measures relative to the criterion on “Additional environmental actions”, there may be, and probably shall be, new effective criteria on specific issues which may reflect specific conditions which may have a general application on the reduction of environmental impacts of tourist accommodation.

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11.2 Second Activity Report

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