

CAMP SITE SERVICE EU ECO-LABEL AWARD SCHEME



EU Eco-Label

MINUTES OF FIRST AHWG 11 April 2008 Rome





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First AD HOC WORKING GROUP (AHWG) meeting for

"Revision of the ecological criteria for the award of the Community Eco-labels for tourist accommodation and camp site services"

Rome, 11th April 2008

MINUTES

1. Attendees

European Commission DG ENV – Project Official Management	
Martin Buechele	Project officer - European Commission
Consultants – Project execution consortium	
Stefania Minestrini	Project Manager APAT
Angelo Polidori	APAT
Dagmar Diwok	ACTA
Francesca Conti	ACTA
Michela Esposito	ACTA

Attendees AHWG	
Luigi Rambelli	Legambiente Tourism – IT
Joan Clark,	European Federation of Camping site Organisations & Holiday Park Associations (EFCO&HPA) - EU
Riccardo Chelucci Anna Di Monaco	Park Hotel Arcobaleno - IT ARPA Emilia Romagna - IT
Adéla Petrová	Competent Body - CENIA, Czech Ecolabelling Agency - CZ







Daniela Toma Competent Body - Ministry of

Environment and Sustainable

Development Romania - RO

Thomas Cook Northern Europe

Themis Kriara Resorts & Hotels - GR

Giuseppe GRAVINA ARPA Puglia -IT

Roberto Saettone Federchimica Plasticseurope - IT

Hellriegel, Bianca Ecocamping - DE

Susanne Møller Competent Body - Ecolabelling

Denmark - DK

Leena Nyqvist-Kuusola Competent Body – SFS, Ecolabelling

Finnish Standards Association - FI

Sabine Schwarz APPA Bolzano - IT

Sandra Sazzini European Environmental Bureau – EUB,

from Legambiente Turismo

Christian Baumgartner BEUC- from Friends of Nature

International - EU

Philippe Roux Competent Body - AFAQ AFNOR

Certification - FR

Chris Nuttall Competent Body- AEAT - UK
Demi Theodori Competent Body - SMK European

Ecolabel - Stichting Milieukeur - NL

Andrew Forte Hilton Hotels - International
Fiona Bewers The Caravan Club - UK
Annelie Couvée-Kooyker OekoZenter Letzebuerg - LU

Marianne B. Eskeland Competent Body - Ecolabelling Norway

- NO

Carla Pinto Competent Body - DGAE - Direcção-

Geral das Actividades Económicas -PT

Otto Fichtl VKI - Austrian Consumer Association,

Dpt. Ecolabel - AT

Carlo Amaduzzi Domus de Janas - IT

Luca Amaduzzi

Marco Giorgio UEAPME - EU

Caterina Tuci Univiversity Ca' Foscari Venice- C.S.S.

IDEAS - IT







Salvatore Russillo ARPA Basilicata - IT

Mary Madigan Competent Body – NSAI Ireland – IE

Aldo Blandino Comune Avigliana (TO)- IT

Saverio Panzica ARPA Sicilia – IT

Sergio Marino

1. Meeting Start. at 10h00

The chair Ms. Stefania Minestrini welcomed the participants of the first AHWG Meeting. Mr. Martin Buechele, as representative of DG ENV D.3 Commission, thanked APAT for handling the criteria revision and expressed his hope for a constructive and rapid revision process.

Ms. Michela Esposito as a representative of ACTA, presented shortly the working plan and the objectives of the meeting. She mentioned that the first tasks of the revision project had been completed, meaning the identification of the members of the Ad Hoc Working Group and the elaboration of a technical Background Document studying the current situation and the need and possibilities for revision.

She then presented the further steps, which include the first draft criteria proposal in June 2008, followed by an intermediate report and a second draft criteria proposal in August 2008 prior to the 2nd Ad Hoc meeting on the 8th of September 2008 in Rome and the EUEB meeting in Brussels a week later, the results of which will be distributed in a second background document and 3rd draft criteria proposal in October 2008. The final steps will be the 3rd AHWG on 14 November 2008 in Rome, followed by the Final Report and Final Draft Criteria Proposal (December 2008) and the Vote at the EUEB meeting in december 2008 and the revision of the User Manual in January 2009.

As objectives for the meeting, Ms. Esposito listed the presentation and discussion of the structure of the Background Document and of the proposals for criteria revision, followed by a discussion regarding the further steps for criteria revision.

2. Technical Presentation

The following documents have been circulated in advance to the participants:

- Working Plan
- Background Document
- Agenda

Ms Dagmar Diwok, representative of ACTA, gave a synthesis of the results outlined in the Background document, regarding updated EU legislation, market situation, efficiency of the Eco-label criteria and synergies with other certifications and management systems.

Ms. Sandra Sazzini from Legambiente Turismo, representing the EEB, stated that EEB wanted to increase the efficiency of Eco-labels and their distribution on the market, and until now did not think that the EU Eco-label had reached a sufficient market share to be efficient.







APAT

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

Ms.

Sazzini also mentioned that she was missing more detailed data regarding the already certified structures and their environmental impact in the report. She also asked why the cooperation and synergy with other Eco-labels mentioned was limited to the Austrian and Nordic Eco-labels.

Ms. Minestrini from APAT answered the question regarding the data stating that the collection of data from certified structures was going on right now and the results will be used in the revision..

Ms. Diwok from ACTA answered the question regarding the synergies stating that official cooperation and harmonisation with other labels was possible only with Eco-labels with an ISO type I approach. She also mentioned that there was constructive cooperation with other ISO type I Eco-labels being carried on right now in some other countries, such as the Green Box in Ireland and the Romanian Ecolabel for Sustainable Tourism.

3. Towards Criteria Revision

Ms. Diwok representing ACTA then proceeded to present the criteria for which, in the framework of legislation update or modification, marketing situation or synergies with other certifications, a revision was needed.

Following, only those criteria which contain proposals for change or which received comments:

Regarding criterion 1(CSS)/1(TAS), (Proposal for change: At least 50 % of energy shall come from renewable energy sources) the following comments were made:

Ms. Carla Pinto representing the Portuguese Competent Body asked if the exception for those countries where no renewable energy sources were available was still valid.

Ms. Minestrini from APAT confirmed this.

Ms. Leena Nyqvist-Kuusola from the Finnish Competent Body stated that this would be difficult, renewable sources are rare and more expensive

Philippe Roux from the French Competent Body stated that raising the limits would mean less acceptance from the structures, therefore no change.

Mr. Christian Baumgartner from Friends of Nature International, representing BEUC supported the increase to 50% and mentioned the comments BEUC had made available to participants at the AHWG.







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Otto Fichtl from the Austrian Competent Body stated that there is need for more into-depth study of the market situation and prices for alternative energy in Europe, in order to avoid discrimination. The optional criterion could be raised, but not the mandatory one.

Ms. Minestrini from APAT answered that to increase the limit is necessary as it has been showned in the update legislation and for the future energy policy where almost 30% would become obbligatory, so if we want to have an ecolabel which goes beyond legislation, an increase is needed; considering that 90% of Italian tourist accommodation already use 100% of RES and according to the future energy policy the proposal of 50% could be a credible compromise in order to reinforce the environmental efficiency of the criterion; furthermore the revised criteria will enter in validity in almost two years and they will last for other at least three years, when the situation on the European market will have moved yet more towards the general accessibility of renewable energy sources and according to availability to less costs.

Ms. Joan Clark representing EFCO stated that for most camp sites, which to 95% consist of SMEs, this criterion represents a big problem due to the high costs of alternative energy.

Ms. Bianca Hellriegel from ECOCAMPING mentioned that several camp sites who had applied for the EU Eco-label in the end could not achieve it precisely due to this criterion, which would have meant too high operating costs and brought problems with long term contracts.

Ms. Stefania Minestrini from APAT assured that the cost and contract situation will be verified.

Philippe Roux from the French Competent Body mentioned that the competitor on the French market for the EU Eco-label, the Green Key, has no such criterion, which guarantees it more success.

Ms. Annelie Couvée-Kooyker representing VISIT and the Luxembourg Ecolabel proposed to combine the sum of energy sources consumed and calculate the amount of alternative energy on this.

Mr.Chelucci from Park Hotel Arcobaleno expressed his opinion that the criterion should be left as it is.

Ms. Sazzini from Legambiente Turismo representing EEB agreed with BEUC, but stated from the Legambiente point of view that if the costs are too high, no businesses will apply for the label.

Regarding criterion 2(CSS)/2(TAS), (Proposal for change: Heavy oil at 0,1% sulphur content, under verification for market availability) the following comments were made:

There was agreement upon the necessity of investigating regarding the availability on the market of fuels with less than 0,1% sulphur content conforming to the new regulations.

Regarding criterion 3(CSS)/3(TAS),(Proposal for change: At least 50 % of the electricity used for heating common areas, rental accommodation and sanitary hot water shall be from renewable energy sources) the following comments were made:







Mr.

Otto Fichtl from the Austrian Competent Body expressed the wish to eliminate the criterion.

Regarding criterion 4(CSS)/4(TAS),(Proposal for change: Increase the efficiency of new boilers to at least four star efficiency. Values that are foreseen in the new directive for energy savings of buildings as regard to energy labelling of optional criterion) the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body mentioned that the criterion is very difficult to comply with for old boilers, and the preparation of the technical documentation results complicated.

Philippe Roux from the French Competent Body suggested to modify the criterion in a way that existing boilers have to be changed if they are below a certain efficiency level.

Regarding criterion 5(CSS)/5(TAS), (Proposal for change: Introduction of class A instead of B) the following comments were made:

Mr. Otto Fichtl from the Austrian Competent Body proposed a change of the wording to: "Any household air-conditioning system"

Regarding criterion 6(CSS)/6(TAS),(Proposal for change: Introduction of a possible change of window insulation during the duration of the EU Flower as for criterion 4 and 5 according to EE for buildings directive. Elimination of the wording "in rooms" in order to enlarge the criterion to all windows of the structure) the following comments were made:

Ms. Adéla Petrová from the Czech Competent Body mentioned that for old, historical buildings this criterion poses great difficulties.

Ms. Stefania Minestrini from APAT assured that if an expert certifies that sufficient isolation is been achieved, no changes in the historical aspect have to be made.

Ms. Demi Theodori from the Dutch Competent Body and Ms Themis Kriara representing the Thomas Cook group proposed an energy use report instead of single reduction criteria, a kind of "energy accounting".

Ms. Susanne Møller representing the Danish Competent Body stressed the fact that for CSS this criterion is nearly impossible to comply with, as the windows of rent caravans do not fall into normal categories.

Ms. Joan Clark representing EFCO stated the necessity for a rewording towards seasonal usage.

Regarding criterion 7(CSS)/ 7(TAS),(Proposal for change: No changes) the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body mentioned the comments received from several licensees regarding their unwillingness to put too many signals and information towards the guests around the place.





APA] Italian

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

Ms.

Stefania Minestrini from APAT answered that it is sufficient to put the information in one "info sheet" which is at guests' disposal. The decision to put other information out is left to the enterprises.

Mr. Otto Fichtl from the Austrian Competent Body agreed with the proposal of combining all criteria regarding communication into one.

Ms. Marianne B. Eskeland representing the Norway Competent Body stated how on the contrary, licensees in her country are happy to establish as many forms of communication with guests as possible.

Regarding criterion 9 (CSS)/9 (TAS), (Proposal for change: Elimination of "Within one year from the date..."; Increasing of the limit at point control: a) at 80% and point, b) at 100% mentioning of directive 2006/32/EC) the following comments were made:

Philippe Roux from the French Competent Body proposed to keep the time frame of 1 year for the acquisition of the energy saving light bulbs.

Ms. Susanne Møller representing the Danish Competent Body mentioned the difficulty to find small class A energy saving light bulbs.

Ms. Stefania Minestrini from APAT suggested using LEDs.

Mr. Otto Fichtl from the Austrian Competent Body confirmed the same opinion as the French Competent Body.

Regarding criterion 54(CSS)/10 (TAS),(Proposal for change: Elimination) the following comments were made:

Ms. Marianne B. Eskeland representing the Norway Competent Body mentioned that Saunas were switched on only when guests were present. So the criterion is unnecessary.

Regarding criterion 11(CSS)/12(TAS),(Proposal for change: Harmonization and reinforcement of the limit to 9 liters/minute) the following comments were made:

Ms. Demi Theodori from the Dutch Competent Body supported a limit even lower than 9 litres.

Ms. Adéla Petrová from the Czech Competent Body agreed with this.

Ms. Susanne Møller representing the Danish Competent Body requested a specific explication regarding Camp Site service on which taps are concerned by this criterion.

Mr. Andrew Forte representing Hilton Hotels requested a distinction for taps (6 liters) and shower (10 liters) and mentioned the problems for older structures with several floors.

Ms. Stefania Minestrini from APAT answered that an average flow shall be measured for the whole structure.

Regarding criterion 13(CSS)/14(TAS),(Proposal for change: Additional indication in the criterion where the information needs to be put: in the toilette) the following comments were made:







Ms. Bianca Hellriegel from ECOCAMPING requested a specification for female toilets.

Regarding criterion 14(CSS)/15(TAS), (Proposal for change: Possible elimination for TAS) the following comments were made:

Mr. Otto Fichtl from the Austrian Competent Body affirmed that this criterion should not be eliminated, as it is relevant both for TAS and CSS.

Regarding criterion 15 (CSS)/16(TAS), (Proposal for change: Elimination of the part concerning staff training (will be included in criterion n.33))the following comments were made:

Elimination for grouping the criterion with others was agreed upon by the participants.

Regarding criterion 16(CSS)/18(TAS), (Proposal for change: Possible elimination) the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body confirmed the difficulty to control such a procedure and the necessity to insert it into the staff training procedures.

Regarding criterion 18(CSS)/20(TAS), (Proposal for change: The tourist accommodation shall inform guests and staff on the correct use of the waste water discharge, in order to avoid the disposal of substances that might prevent waste water treatment in accordance with the municipal waste water plan. Where a waste water plan from the Municipality is not available, the tourist accommodation/camp site shall provide a general list of substances that shall not be disposed of with the waste water according to the Groundwater Directive (2006/118/EC)) the following comments were made:

Reformulation of the criterion was agreed upon by the participants.

(LUNCH BREAK)

Regarding criterion 20(CSS)/21(TAS), (Proposal for change: Elimination and integration with criteria regarding staff training and guest information (32/33 CSS, 33/34 TAS)) the following comments were made:

Ms. Annelie Couvée-Kooyker representing VISIT and the Luxembourg Ecolabel stressed that this criterion was important and should not be eliminated.

Ms. Stefania Minestrini from APAT clarified that it would be a training criterion but also an obligation .

Ms. Adéla Petrová from the Czech Competent Body opposed elimination too.

The criterion was agreed to remain unchanged.

Regarding criterion 21(CSS)/22(TAS), (Proposal for change: Elimination and integration with criteria regarding staff training and guest information (32/33 CSS, 33/34 TAS) the following comments were made:







Ms.

Demi Theodori from the Dutch Competent Body stated the need to provide evidence on the training courses, and a reformulation with more details of the criterion.

Regarding criterion 23(CSS)/24(TAS), (Proposal for change: Elimination and integration with criterion criteria regarding staff training and guest information (32/33 CSS, 33/34 TAS), including the disposal of electrical appliances as of WEEE/ROHS directives) the following comments were made:

Ms. Demi Theodori from the Dutch Competent Body requested a reformulation of the criterion in order to make it even clearer what staff and guests are supposed to do and proposed continuing to keep it as a separate criterion.

Regarding criterion 26(CSS)/27(TAS),(Proposal for change: The guest shall be informed about the waste reduction policy of the tourist accommodation and the use of quality product alternatives. No disposable products such as one portion or one use toiletries, cups, glasses, plates and cutlery shall be used unless required by law) the following comments were made:

Ms. Joan Clark representing EFCO stressed the problems with take away for camp site.

Ms. Annelie Couvée-Kooyker representing VISIT and the Luxembourg Ecolabel also mentioned big problems in finding biodegradable objects.

Mr. Saettone from Federchimica stated that this criterion constitutes a discrimination for the plastic sector and announced to participants the existence of a research made by TNO which shows that disposable cups are a better solution compared to the normal ones.

Mr. Otto Fichtl from the Austrian Competent Body confirmed the difficulty of this criterion which in Austria caused the exclusion of two enterprises from the certification.

Ms. Leena Nyqvist-Kuusola from the Finnish Competent Body mentioned the problems causedby the criterion in the case of weddings or other events.

Ms Stefania Minestrini from APAT stated that the criterion respond to the objective to minimize wastes and that when a correct communication to guest is made, it is a successful criterion. In particular according to the Italian experience companies are very happy to eliminate disposable products in order to reduce wastes and to reduce costs, on the other hand guest are happy as well to receive instead of disposable toiletries a present from companies and using dispensers.

Mr Riccardo Chelucci from Parc Hotel Arcobaleno confirmed that his guests were very happy to receive local products as souvenir for their stay and as possible compensation for the elimination of the toiletry kit.

Regarding criterion 27(CSS)/28(TAS), (Proposal for change: Smoking in not more than 50% of common areas for guests and staff should be only allowed if these are separately ventilated) the following comments were made:

Mr. Christian Baumgartner from Friends of Nature International, representing BEUC expressed their opinion that smoking should be eliminated completely from ecolabelled enterprises.







Ms.

Annelie Couvée-Kooyker representing VISIT and the Luxembourg Ecolabel mentioned that there should be special limits for smoking in external areas to avoid the use of outside heating appliances.

Regarding criterion 28(CSS)/29(TAS),(Proposal for change: "Addition of: Information and links on the web site shall be made easily available to guests and staff") the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body stressed the need for a differentiation for Camp site services where the important issue is information on how to reach other places from there with public transport, and not how to arrive to the camp site.

Mr. Christian Baumgartner from Friends of Nature International, representing BEUC requested more mandatory criteria regarding soft mobility.

Regarding criterion 29(CSS)/30(TAS), (Proposal for change: Elimination) the following comments were made:

Philippe Roux from the French Competent Body asked to keepthe criterion. This was supported also by Ms. Demi Theodori from Duch Competent Body.

Regarding criterion 30(CSS)/31(TAS),(Proposal for change: Integration of the criterion with: "and air conditioning systems". Frequency of maintenance as of Directive 92/42/CE if not yearly) the following comments were made:

Elimination of the criterion is agreed upon by the participants.

Regarding criterion 31(CSS)/32(TAS), (Proposal for change: POLICY SETTING AND ENVIRONMENTAL PROGRAM - Addition of supplementary elements: Insertion of social concerns (local employees, local purchasing, against sexual tourism, against hunting of endangered species). Better specification:

Comments and complaints from guests received by means of a questionnaire shall be taken into account. (elimination of optional criterion n.82) the following comments were made:

Mr. Christian Baumgartner from Friends of Nature International, representing BEUC requested clarification on how this could be controlled and supported the general intent of the modification.

Mr. Martin Buechele from the EC expressed doubts that the part regarding local employees agrees with the free choice of labour guaranteed by the EU.

Ms. Susanne Møller representing the Danish Competent Body stressed the difficulties in controlling such a criterion.

Philippe Roux from the French Competent Body did not agree on the request but accepted the need for sustainability.

Ms. Demi Theodori from the Dutch Competent Body disagreed with the policy change.

Mr. Otto Fichtl from the Austrian Competent Body disagreed with the questionnaire.







Ms.

Diwok from ACTA explained that a guest feedback could be done also verbally.

Regarding criterion 32(CSS)/33(TAS),(Proposal for change: Integration with criterion n.16-21-22-24-25 TAS and related CCS criteria. Added information about disposal of electrical and electronic equipment according to WEEE and hazardous substances according to ROHS) the following comments were made:

The modifications were agreed upon.

Regarding criterion 34(CSS)/35(TAS), (Proposal for change: Simplification with the help of electronic tools) the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body stated that measuring in m2 does not make sense for Camp Sites.

Philippe Roux from the French Competent Body proposed to use m3 instead m2 so high rooms can be calculated too.

Mr. Luca Amaduzzi from the Domus de Janas Hotel requested a frequency of every month or 1 year but not every 3 months.

Mr. Andrew Forte representing Hilton Hotels asked for more flexibility.

Ms. Annelie Couvée-Kooyker representing VISIT and the Luxembourg Ecolabel stated the need for more simplification, and announced that she would send an excel sheet in order to show how they have dealt with such a kind of data

Ms. Joan Clark representing EFCO expressed the difficulty to measure quantity of visitors in camp sites with year round occupation.

Regarding criterion 35(CSS)/36(TAS),(Proposal for change: Simplification with electronic tools. Modification of "dry substances" for TAS:

Harmonization with the CCS criterion) the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body mentioned that for CSS it is difficult to monitor the consumptions.

Regarding criterion 36(CSS)/37(TAS), (Proposal for change: Modification: The tourist accommodation/camp site has adopted measures to save energy and water, to reduce waste, to improve the local environment) the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body expressed the need to have the samewording for TAS and CSS,.

Regarding criterion 37(CSS)/38(TAS),(Proposal for change: Addition of "hydroelectric power" to harmonize TAS with CSS) the following comments were made:







Ms.

Susanne Møller representing the Danish Competent Body requested to reward also the production and input into the grid of energy from RES.

Regarding criterion 38(CSS)/39(TAS),(Proposal for change: Proposal for score modification and increase of the percentage up to 70%) the following comments were made:

Mr. Otto Fichtl from the Austrian Competent Body proposed to differentiate the score for levels over 70% of RES production.

Regarding criterion 51(CSS),(Proposal for change: Addition of criterion also for TAS) the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body proposed to split the criterion in 2 (1 point each and 2 points if both)

Regarding criterion 59(CSS)/56(TAS),(Proposal for change: Reduction of the limit to 7,5 litres/minute) the following comments were made:

The modification was agreed upon.

Regarding criterion 60(CSS)/57(TAS) (Proposal for change: Increase to 100%), the following comments were made:

Mr. Otto Fichtl from the Austrian Competent Body proposed 95%.

Regarding criterion 63(CSS)/60(TAS), (Proposal for change: increase to 100%) the following comments were made:

Accepted at least 95%

Regarding criterion 67(CSS), (Proposal for change: Addition of criterion also for TAS) the following comments were made:

General agreement on extra points for dosing mechanism

Regarding criterion 80(CSS)/68(TAS),(Proposal for change: Elimination of "except where required by law") the following comments were made:

Philippe Roux from the French Competent Body stressed that glass next to swimming pools is a problem.

Regarding criterion 81(CSS)/69(TAS), (Proposal for change: Mandatory criterion with the exception of butter, diet jam and chocolate spread) the following comments were made:

Philippe Roux from the French Competent Body underlined that this always causes problems with hygiene. He suggested glass packaging as an alternative.







Mr.

Riccardo Chelucci from Park Hotel Arcobaleno stated his positive experiences offering only non-packaged local food at breakfast.

Ms Stefania Minestrini from APAT stated that this criterion is not in contrast with any legislation or regulation concerning hygiene aspects and that according to the experience made this criterion implies a better quality perception for the guest who prefers more genuine food for breakfast than industrial single dose packages.

Regarding criterion 84(CSS)/71(TAS), (Proposal for change:Addition of "other products" also for TAS) the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body mentioned the difficulty to show compliance, particularly for CSS.

Ms Stefania Minestrini from APAT answered that in order to show compliance with the criterion a declaration from the part who is receiving the material is normally requested.

Regarding criterion 89(CSS),(Proposal for change:No changes) the following comments were made:

Mr. Otto Fichtl from the Austrian Competent Body proposed also façade greening for TAS.

Regarding criterion 91(CSS)/73(TAS), (Proposal for change: Increase of percentage to 100%) the following comments were made:

Philippe Roux from the French Competent Body did not agree with the change.

Mr. Otto Fichtl from the Austrian Competent Body proposed a differentiation in score: 70% of rental accommodation 1 point, 100% 1,5 points.

Regarding criterion 92CSS)/74(TAS),(Proposal for change: No changes) the following comments were made:

Mr. Otto Fichtl from the Austrian Competent Body requested more and different proposals on soft mobility.

Regarding criterion 96(CSS)/79(TAS), (Proposal for change: Addition of the interdiction of consumption of local endangered species also for TAS) the following comments were made:

Philippe Roux from the French Competent Body proposed to include in the criterion the request for seasonal products.

Regarding criterion 97(CSS)/78(TAS), (Proposal for change: No changes) the following comments were made:

Mr. Otto Fichtl from the Austrian Competent Body proposed a higher score for 100% organic food products.

Regarding criterion 100(CSS), (Proposal for change: No changes) the following comments were made:







Mr. Otto Fichtl from the Austrian Competent Body proposed the criterion also for TAS.

Regarding criterion 101(CSS)/83(TAS), (Proposal for change: No changes) the following comments were made:

Ms. Susanne Møller representing the Danish Competent Body proposed extra energy meters for CSS for guest energy consumption.

Chris Nuttall from the UK Competent Body stated that their camp sites cannot become sellers of electricity to 3rd parties by law.

Philippe Roux from the French Competent Body asked to make the criterion mandatory for CSS and TAS for those who have a swimming pool or restaurant.

Regarding criterion 102(CSS)/84(TAS), (Proposal for change:No changes) the following comments were made:

Mr. Saverio Pansica from ARPA Sicilia mentioned the possibility of giving extra points also to structures belonging to areas which are particulary environmental friendly.

Ms. Diwok from ACTA answered that this would be reasonable in case these protected areas imposed particular criteria on the structure, and those criteria could be eventually used to achieve points with the "additional environmental measures".

Mr. Luca Amaduzzi from the Domus de Janas Hotel proposed the use of rechargeable batteries for remote TV controls, rechargeable toner for copying machines and printers and the serving of purified water instead of bottled water to guests as additional optional criteria.

Ms. Demi Theodori from the Dutch Competent Body mentioned the possibility of a future enlargement of the product group to conference centers, on which the Dutch Ecolabel was working right now, also in the vision of making the choice for meeting venues easier in the GPP context.

Ms Stefania Minestrini from APAT answered that due to the budget for the project and to the time schedule requested from the European Commission it is not possible to enlarge the product group definition but proposals for criteria on the service provided by conference centres which can fit with the present criteria can be investigated and eventually added in order to let even conference centres be eco-labelled.

4. End of the meeting at 17h00

European Commission, APAT and ACTA thanked all the participants for their intervention and discussions. All interested parties were kindly asked to send further comments and reactions as soon as possible to the consultants by e-mail, in order to prepare the first draft of revised criteria for June.



