

# EU ECOLABEL FOR CLEANING SERVICES

## BEUC and EEB comments to the criteria proposal October 2015

Contact: **Blandine Cupidon** – [environment@beuc.eu](mailto:environment@beuc.eu) & [blandine.cupidon@eeb.org](mailto:blandine.cupidon@eeb.org)

Ref.: BEUC-X-2015-126 - 15/12/2015

### **EEB -EUROPEAN ENVIRONMENTAL BUREAU**

Bd. de Waterloo 34, B-1000 Brussels • Tel. +32 (0)2 289 10 90 • Fax +32 (0)2 289 10 99 • [info@eeb.org](mailto:info@eeb.org) • [www.eeb.org](http://www.eeb.org)  
EC register for interest representatives: identification number 06798511314-27

### **BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND**

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • Fax +32 (0)2 740 28 02 • [consumers@beuc.eu](mailto:consumers@beuc.eu) • [www.beuc.eu](http://www.beuc.eu)  
EC register for interest representatives: identification number 9505781573-45

## Summary

The European Commission (EC) is developing EU Ecolabel criteria for Cleaning Services. In September 2015, the Joint Research Center (JRC) of the EC presented draft criteria proposals which were discussed at the 2nd Ad Hoc Working Group (AHWG) on 22 October 2015 in Brussels, Belgium.

Ahead of the EU Ecolabelling Board (EUEB) meeting which will take place on 20, 21 and 22 January 2016, this paper provides BEUC and EEB recommendations on the draft criteria proposal that will be discussed during the meeting.

Consumers' organisations and environmental NGOs consider that the proposal should be improved with regard to the following points of concerns:

- We have a general and major reservation about the operation and the structure of the points system proposed by the EC. In this particular case, the effect is that it contributes to a watering down of the criteria on Cleaning Services. The points system should be further revised so that points are established mostly based on the environmental benefits rather than on the technical and economic feasibility. In order to minimise the negative impact of this system on the EU Ecolabel's objectives, we strongly recommend raising the minimum amount limit of points required to be awarded the EU Ecolabel to ensure the environmental excellence of ecolabelled companies. A minimum of 40% is not acceptable, we recommend requiring at least 60% of the optional criteria set.
- The minimum thresholds of ecolabelled products used in the cleaning service companies should be raised. It contributes to foster the uptake of ecolabelled products and educate the staff members on sustainable practices.
- The use of microfiber products should be better promoted in the Ecolabel scheme as they have proven significant environmental benefits.
- All consumable goods supplied, such as hand soaps, paper towels and tissues, toilet paper should be ecolabelled.

## **1. General remarks and recommendations**

### ***On-sites visits at least once per year***

On-site inspections both at the applicant's premises and at the client's premises are essential to assess and verify compliance of the company with the Ecolabel criteria.

However, BEUC and the EEB hold the view that they should be carried out once per year and not less often to assess the company's performance on a regular basis.

### ***Social criteria highly welcome***

Consumers' organisations and environmental NGOs fully support the social criteria proposed by the JRC. Social requirements are of high importance especially in this service group and it is crucial that the Ecolabel ensures good and fair working conditions of employees.

The cleaning service company shall indeed fulfil all obligations concerning minimum wage - or collective agreements in the countries not having minimum wage-, pay taxes and social insurance.

In case the cleaning services company is subcontracting its activities and uses the subcontractor's control system, the Ecolabel requirements should ensure that the subcontractor also meets the same requirements. In addition, we recommend including an obligation for all staff members to have an accident insurance.

### ***Structure and working of the points system not ambitious enough***

BEUC and the EEB have concerns regarding the three pillars that the JRC used to define mandatory criteria. Although we recognize the importance of the technical and economic feasibility, we hold the view that the environmental improvements potential should be the key factor in the development of Ecolabel criteria. The potential environmental benefits should then count for at least half of the criteria development as the EU Ecolabel aims to reward the best environmentally performing cleaning companies. The economic and technical factors should be considered for the remaining 50% in drafting the mandatory criteria, so 25% each.

Regarding the optional criteria set, BEUC and the EEB are very worried to see that the JRC proposes to award the Ecolabel to companies performing only 6 out of 16 points in the optional criteria, and only 3 points out of 7 in the additional aspects criteria.<sup>1</sup> Achieving 40% of the whole optional criteria set is in our view not ambitious enough and would undermine the credibility of the Ecolabel, which is to make best environmentally performing companies stand out in the market.

The argument that higher thresholds would leave out companies on the market is not valid and is in contradiction with the objectives of the label: the EU Ecolabel should be awarded to the top 10-20% best performing cleaning services and such low minimum requirements are not acceptable. This argumentation from the JRC should not justify the lowering of ambition. Besides, we strongly disagree with this approach as it would undermine the credibility of the scheme and give misleading information to consumers.

---

<sup>1</sup> The set of requirements in the Cleaning Services is divided in three parts: the mandatory criteria, the optional criteria and the additional optional criteria.

In addition, such an approach would encourage companies, in a pragmatic way, to stick to the bottom line to be awarded the EU Ecolabel. With such low minimum requirements, there will be no incentives for companies to further develop environmental friendly practices and continuously make efforts to limit their environmental impacts.

BEUC and the EEB therefore recommend raising the minimum points to achieve from 6 to 10 points on the main service aspects. A minimum of 60% would be more in line with the objectives of the label which needs to remain trustworthy for consumers.

## **2. Criterion M1: The use of cleaning products with lower environmental impact should be increased**

BEUC and the EEB recommend raising this requirement from 50% to 70% by volume at purchase of cleaning products bought per year being ecolabelled products. The detergents product group is one of the most successful and we do not see any reasons to keep such a low threshold. In addition, this is a mean to boost the take-up of Ecolabel products in the market.

We highly welcome the introduction of the Hazard Statements classification table that is applicable to non-ecolabelled products. However, BEUC and the EEB recommend introducing additional requirements on the non-ecolabelled products in order to ensure their safety and sustainability and suggest, in this respect, setting requirements aligned with the criterion on *excluded or limited substances for All-Purpose Cleaners (APC)*. Service providers should not be awarded the EU Ecolabel if they make use of non-environmental friendly products containing hazardous compounds and causing harm to consumers and the environment. As many of the existing products available on the market cause damages to the environment through toxic volatile emissions and water pollution, it is essential to ensure their strict exclusion from the EU Ecolabel cleaning services, as the aim of the EU Flower is to promote products and services with the best environmental profile.

## **3. Criterion M3: The use of microfiber products should be encouraged**

Consumers' organisations and environmental NGOs recommend raising the threshold from 50% to at least 70% of textile cleaning accessories made of microfiber.

We see many benefits of using cleaning textiles made of microfiber:

- They improve the cleaning performance and allow a deep cleaning.
- They help reducing the contribution to the waste stream and the use of water and harmful chemicals, compared to other cleaning materials.
- They help reducing cross-contamination risks, which is of high importance in areas such as hospitals.

The use of microfiber products is fully in line with the objectives of the scheme.

## **4. Criterion M4: All consumable goods should be ecolabelled**

BEUC and the EEB do not agree with the proposed thresholds that we consider too low.

NGOs recommend that all products supplied are ecolabelled.

If this is not supported, we highly recommend as a minimum:

- At least 70% by volume of hand soaps;
- At least 90% of paper towels and tissues;
- At least 90% of toilet papers.

We consider these thresholds as minimum requirements. The paper products are among the most successful ones and have a high market penetration in all EU-28 countries, as stated in the technical report. The EEB and BEUC do not see any reasons why the thresholds cannot be raised to 100% or at least 90%.

This criterion is of high importance as consumable goods generate waste and cannot be recycled or reused. They have therefore a strong environmental impact. It is crucial to ensure that the majority of the products are ecolabelled and have less environmental impact.

In addition, the argument stating the will of the client of having other products than ecolabelled should not be considered to undermine this criterion. On the contrary, when a client wants to benefit from an ecolabelled company, it is understood that he has environmental awareness and is convinced by the added-value of the ecolabelled products.

## **5. Criterion M5: Staff should be trained at least once a year**

NGOs fully support the criteria proposed by the JRC. It is important that the new staff members are trained within 4 weeks after their starting date so that they are well educated, can incorporate best practices and behave in a responsible manner as soon as possible.

We agree that staff should be updated once a year on the environmentally friendly practices at work.

## **6. Criterion M8: Solid waste should be sorted in an efficient way**

BEUC and the EEB support this change brought by the JRC. Solid waste should be sorted into the waste stream categories provided at the client's premises. However, in case hazardous waste such as low energy bulbs, paints, electronic devices, cannot be collected at the premises, the cleaning service company should be able to provide this service and collect them.

In relation to this, BEUC and the EEB consider that it would be very beneficial to require more waste fractions from the company than the ones existing at the clients' premises. In case it is not possible to sort certain material at the clients' premises, requirements should be set forcing the company to take away the material and put it in the relevant waste fraction at the company's premises. Since the clients cannot always decide which waste fractions they implement in their buildings or houses, efficient and complete waste sorting should fall under the ecolabelled company's responsibility.

## **7. Criterion O1: The use of concentrated undiluted cleaning products should be increased**

Consumers' organisations and environmental NGOs ask for a more ambitious threshold of at least 50% by volume at purchase of all cleaning products used per year shall have a minimum dilution rate of 1:80. Our demand is achievable as there are today a growing number of concentrated products especially in the professional sector.

## **8. Criterion O2: The use of cleaning accessories with lower environmental impact should be encouraged**

BEUC and EEB first proposal is to make this criterion mandatory.

If this is not supported, consumers' organisations and environmental NGOs recommend raising the thresholds as follows:

### **"O2 (a) Mops**

At least 80% of mops used per year shall have been awarded with the EU Ecolabel for Textiles or with another ISO Type I Ecolabel.

### **O2 (b) Cloths**

At least 80% of cloths used per year shall have been awarded with the EU Ecolabel for Textiles or with another ISO Type I Ecolabel."

It is of high importance that cleaning services companies use as much as possible ecolabelled products with lower environmental impact. It contributes to the education of the staff members and also fosters the uptake of ecolabelled products on the market.

## **9. Criterion O3: The energy efficiency of vacuum cleaners criterion should be mandatory and further improved**

BEUC and the EEB do not support this requirement. We rather recommend requiring that all new vacuum cleaners bought by the company meet top class on energy efficiency as defined by the EU Energy Label. This can be verified by invoices and technical data sheets.

Furthermore, we encourage the JRC to include the above mentioned criterion in the mandatory criteria set.

## **10. The criterion O5 on solid waste sorting and disposal at the cleaning sites should be made mandatory**

We agree that solid waste should be sorted into the waste stream categories provided at the client's premises. However, we recommend including this requirement in the mandatory set of criteria as waste sorting is of high importance from an environmental point of view and contribute to lower the environmental impact of the company.

Besides, if hazardous waste, such as low energy bulbs, paints, electronic devices, cannot be collected at the premises, the cleaning service company should be able to provide this service and collect them.