

# GREEN PUBLIC PROCUREMENT FOR CLEANING SERVICES

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

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## Summary

The European Commission (EC) is revising the EU Green Public Procurement (GPP) criteria for Cleaning Services. In September 2015, the Joint Research Center (JRC) of the EC presented a draft criteria proposal 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.

EU GPP criteria are formulated either as Selection criteria, Technical specifications, Award criteria or Contract performance clauses. For each set of criteria there is a choice between two levels of environmental ambition: the core criteria and the comprehensive criteria.

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

- The minimum thresholds of ecolabelled cleaning products and accessories used in the GPP cleaning service companies should be raised. It would contribute to foster the uptake of ecolabelled products and educate the staff members on sustainable practices.
- The use of microfiber products should be better promoted through the GPP as they have proven significant environmental benefits and perform better than conventional products.
- The minimum thresholds for ecolabelled consumable goods such as hand soaps, paper towels and tissues, toilet paper are not ambitious enough and should be raised in order to be aligned with the Ecolabel criteria.
- All new vacuum cleaners bought by the company should meet class A on energy efficiency and not only one as proposed by the JRC.

BEUC and the EEB advocate for a greater integration of the EU Ecolabel and the GPP criteria in the EC Sustainable Production and Consumption framework. The GPP provide significant opportunities to achieve a higher uptake of Ecolabel products on the market. This is why BEUC and EEB consider that it is important to align the GPP core criteria with the EU Ecolabel criteria in all aspects.

## **1. Criterion T1: Use of cleaning products with lower environmental impact**

BEUC and the EEB recommend requiring at least 50% by volume at purchase of cleaning products bought per year ecolabelled in the core criteria, and at least 70% in the comprehensive criteria. The detergents product group is one of the most successful and we do not see any reasons to keep such low thresholds. On the contrary, GPP is an excellent tool to foster the take-up of Ecolabel products in the market.

Consumers' organisations and environmental NGOs highly welcome the introduction of the Hazard Statements classification table that is applicable to non-ecolabelled products. However, we 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 of the EU Ecolabel cleaning services, as the aim of the EU Flower is to promote products and services with the best environmental profile.

## **2. Criterion T2: Use of microfiber products**

BEUC and the EEB recommend raising the threshold to at least 50% for the core criteria and 70% for the comprehensive criteria of textile cleaning accessories made of microfiber.

BEUC and the EEB see many benefits of using cleaning textiles made of microfiber:

- It improves the cleaning performance and allows a deep cleaning.
- It helps reduce the contribution to the waste stream and the use of water and harmful chemicals, compared to other cleaning materials.
- It helps reduce cross-contamination risks, which is of high importance in areas such as hospitals.

This is why the use of microfiber materials should be better promoted through GPP criteria.

### **3. Criterion T3: Solid waste sorting and disposal at the cleaning sites**

We support this criterion but we would like to include additional requirements.

Solid waste should indeed be sorted into the waste stream categories provided at the client's premises also. 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.

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.

### **4. Criterion T4: consumable goods**

NGOs do not agree with the proposed thresholds that we consider too low and not ambitious enough.

We rather recommend requiring:

- At least 40% by volume of hand soaps;
- At least 50% of paper towels and tissues;
- At least 50% of toilet papers.

for the core criteria;

and:

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

for the comprehensive criteria.

BEUC and the EEB consider these thresholds as minimum requirements. The Ecolabel paper products are among the most successful ones and have a high market penetration in all EU-28 countries. NGOs do not see any reasons why the thresholds cannot be raised further.

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 Ecolabel and have less environmental impact.

## **5. Criterion S1: Staff training**

BEUC and the EEB fully support the criteria on staff training 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 A2: use of concentrated undiluted cleaning products**

BEUC and the EEB recommend awarding points to tenders which have at least 50% by volume of all cleaning products directly related to the cleaning tasks a minimum dilution rate of 1:80. This 50% threshold is achievable as there are today a growing number of concentrated products in the professional sector. In addition, this criterion is optional and concentrated products should be better promoted through the GPP.

## **7. Criterion A3: use of cleaning accessories with lower environmental impact**

Considering the high potential of environmental benefits of ecolabelled products, BEUC and the EEB recommend raising the thresholds from 20% to at least 50% for the core criteria, and 50% to 70% in the comprehensive criteria.

NGOs also hold the view that products labelled with the Nordic Ecolabel should also be accepted in the scope of this criterion like ecolabelled products.

## **8. Criterion A4. Energy efficiency of vacuum cleaners**

BEUC and the EEB do not support this requirement. We rather recommend requiring that all new vacuum cleaners bought by the company meet the 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 technical specifications.