FAQ
Indoor Cleaning Services

This document collects the answers agreed upon by the EU Ecolabel Competent Body Forum to the frequently asked questions related to the EU Ecolabel Criteria for Indoor Cleaning Services- Commission Decision (EU) 2018/680 of 2 May 2018.

ARTICLES 1-3
Scope

Is it sufficient that a sub-division/subsidiary/branch/department (Art.3) keeps separate accounting records or does a legal entity (eg. Ltd, GmbH) need to be established?
A company must demonstrate that they keep separate accounting records for their EU Ecolabel and non-EU Ecolabel activities, regardless of being registered as separate legal entities. When promoting/communicating its awarded EU Ecolabel, the company must clearly state that only that specific sub-division/department X has been awarded with the EU Ecolabel.

If the sub-division/subsidiary/branch/department is not a legal entity, does this mean that the contract will be registered to the company limited to the department X?
Yes. CBs shall issue one contract per company only; if the company provides both EU Ecolabel and non-EU Ecolabel services then the contract will have to clearly indicate that only the EU Ecolabel sub-division/subsidiary/branch/department is covered. The EU Ecolabel certificate will have to clearly specify this info too.

Is it possible to perform disinfection activities under the EU Ecolabel license?
No, disinfection activities are outside the scope of the criteria (Art 1.3). The use of disinfectants is not allowed in EU Ecolabel cleaning services. Nevertheless publically accessible hospital areas, such as corridors, waiting and break rooms are included in the scope as they do not necessarily require disinfection.

Can a company providing EU Ecolabel cleaning services provide also other services like maintenance, gardening, porterage, (etc.)?
No, unless they create a separate sub-division/subsidiary/branch/department with separate accounting records.

Can an EU Ecolabel service provider take care also of the cleaning of outdoor areas?
In principle no. The cleaning activity should be performed primarily indoor. Specific needs for cleaning areas partially involving minor outdoor sections will be evaluated on a case-by-case basis.
What does “a dilution rate of at least 1: 100” exactly mean?
It means that maximum 10mL of product can be diluted in 1L of water.

How should we interpret “of all cleaning products used”? Can vinegar be considered within these products?
“All cleaning products used” means all routine cleaning products (within or outside the scope of application of the EU Ecolabel Criteria for Hard Surface Cleaning Products (HSCP) – Decision 2017/1217/EU) except disinfectants and non routine products. Looking at the Figure below it includes sub-categories 1;2;3;4. Non routine HSC products and disinfectants cannot be used within the EU Ecolabel service, they could be managed only by a separated sub-division/subsidiary/branch/department with separate accounting records. Vinegar can be calculated among “all cleaning products” either in sub-categories 3 or 4 of the Figure below.

Within the calculation of the ecolabelled products % can we include also products that don’t fall within the scope of EU Ecolabel Criteria for Hard surface cleaning services (HSCP) but that hold other Iso Type I (ISO 14024) label?
Yes, these % can be calculated considering all the used products falling in sub-categories 1 and 3 (see Figure below).

To which sub-categories of the Figure below applies Criterion M1(b) and how to verify criterion M1(b)(ii) for products not falling within the scope of EU Ecolabel for Hard Surface Cleaning Products (HSCP)?
Criterion M1(b) applies to “all products that have not been awarded the EU Ecolabel for HSCP or another EN ISO 14024 type I ecolabel”, therefore to all products falling in sub-categories 2 and 4 (see Figure below). For products not falling within the scope of EU Ecolabel for HSCP Criterion M 1 (b) (ii) shall be verified only in its applicable parts (e.g. not in the parts where specific emissions thresholds are available only for EU Ecolabel HSCP subcategories as it happens for Phosphorous or VOCs).

Where a company uses alternative cleaning techniques that don’t foresee the use of cleaning products, (e.g. machines or ozonated water), can we consider that the applicant is in compliance with the criteria M1 and O1?
The company can use these techniques but it would not be considered enough to fulfil criterion M1 and no points would be given for criterion O1.

Figure
CRITERIA M3/O3
Use of microfibre products

Are disposable textile cleaning accessories allowed in EU Ecolabel cleaning services?
The use of disposable cleaning accessories is allowed although, criterion M4 for staff training states that staff should be trained to use durable and reusable cleaning accessories and minimise the use of single use cleaning supplies.

In order to fulfill the criteria should the non disposable textile cleaning accessories be made of 100% microfibers?
No, as the criteria don’t specify any minimum required % of microfiber content in each accessory. All products containing a certain amount of microfibers are potentially compliant with criteria M3 and O3.

CRITERION M4
Staff training

What if temporary staff stay less than six weeks (one day for example), is the training mandatory?
Training is 100% mandatory for all temporary and permanent employees.

Can the temporary staff be trained by his last company or employment agency?
Yes, they can be trained by a former employer that has been training employees on the EU Ecolabel cleaning services criteria.

How should we treat the case, when the employees are already trained by the companies and able to use all the techniques referred to in the Decision?
If the employees have already been trained (and documentation proving this is available) there is no need to retrain them.

Could interactive training be allowed for the cleaning staff– (e.g. digital application: the video material is showed, or non-digital: images and textual description)?
Interactive training is allowed as long as there is proof (reports, records; list of participants) that the training has been performed efficiently.

CRITERION O4
Use of cleaning accessories with low environmental impact

Can Öeko Tex certified mops and cloths be used and considered as equivalent to Type I ecolabels?
Öeko Tex is not considered an Iso 14024 Type 1 ecolabel, therefore it would not be accepted.

CRITERION O5
Energy efficiency for vacuum cleaners

INAPPLICABLE!

Following the annulment, by the EU Court of Justice, of the Energy Labelling Regulation for vacuum cleaners, which entered into effect on 18 January 2019, (the “Dyson case”), the optional Criteria O5 is no longer applicable and cannot therefore be chosen by applicants.
**CRITERION O9**  
*Vehicle fleet owned or leased by the applicant*

Can we consider that a purchasing policy in compliance with this criterion is sufficient to obtain the points?  
No, a simple purchasing policy proposal is not considered to be enough.

**CRITERION O11 b**  
*Ecolabelled products*

What does “100% of products units of a product group” mean?  
It means that if the service provider uses one product that falls within the scope of an ecolabel, then all the other units of that specific product group that he uses must bear the ecolabel in order to get the max 3 points. Eg. If he uses one specific ecolabel laundry detergent, then all the laundry detergents he buys and uses must also bear an ecolabel in order for him to get the points, but he would be allowed to use “stain removers” (also falling within the ecolabel scope) that have not been awarded.

**Overarching Criteria**

Once the EU Ecolabel has been awarded to a cleaning service, is the applicant required to comply only with new contracts signed after the certification date?  
No, the cleaning company must guarantee that any service provided after obtaining the certification is fully compliant with the EU Ecolabel cleaning service requirements.

Must the criteria, that set minimum percentages (M1, M3, O1, O2, O3, O4…) be implemented/verified at each cleaning site?  
No, the minimum percentages set out in the criteria do not need to be verified at every cleaning site but at the totality of all cleaning sites where the EU Ecolabel services are provided.