

Ref.: PM10-75/96

## NET's Comments on the Commission Communication on Tourism

### Implementation of the Commission's Communication on Tourism

NET (the Network of European private entrepreneurs in the Tourism sector) is a platform of 7 trade associations whose common objective is to promote the interest of private tourism entrepreneurs in Europe.

NET members welcome the Commission's Communication on Tourism COM(2010) 352) and consider it as an important step towards a true tourism policy in Europe.

NET fully welcomes the 4 main objectives identified to constitute the backbone of the new framework:

- Stimulate competitiveness in the European Tourism Sector;
- Promote the development of sustainable, responsible and high-quality tourism;
- Consolidate the image and profile of Europe as a collection of sustainable and high quality destinations;
- Maximize the potential of EU financial policies and instruments for developing tourism

These pillars represent the proper foundation for a sound and beneficial tourism policy.

Therefore the 21 foreseen actions should be properly monitored to avoid the dispersion of resources and efforts as well as to ensure that existing initiatives of Member States and the tourism industry are not hindered.

It should be advisable to have a permanent roundtable with stakeholders to follow the implementation and elaborate on future follow ups to the actions.

#### 1. Stimulate competitiveness in the European tourism sector

NET welcomes the Commission commitment to stimulate competitiveness in the European tourism sector. However, given the horizontal nature of the industry and the transverse nature of the tourism policy, better and business-friendly regulation is critical to achieve this objective. Therefore, more emphasis should be put on the need of better impact assessments, reduction of administrative burdens and simplification of EU legislation.

#### ECC

CRUISE COMPANIES OPERATING  
IN EUROPE

#### ECTAA

TRAVEL AGENTS &  
TOUR OPERATORS IN EUROPE

#### EFCO&HPA

CAMPS SITES, HOLIDAY PARKS  
& HOLIDAY VILLAGES IN EUROPE

#### ETOA

TOUR OPERATORS BRINGING  
VISITORS TO EUROPE

#### HOTREC

HOTELS, RESTAURANTS  
& CAFÉS IN EUROPE

#### IAAPA

INTERNATIONAL ASSOCIATION OF  
AMUSEMENT PARKS AND ATTRACTIONS

#### IRU

BUS, COACH & TAXI OPERATORS  
WORLDWIDE

With regards to the first objective, NET would like to underline the importance of the integration of information society tools and services into all tourism activities, and therefore welcomes the actions foreseen in the communication to reach this objective.

Actions 3, 4

Micro and small companies do not always have the knowledge to understand that innovation and ICT technologies have become determining factors to help them remain competitive. Actions to make companies aware of the importance of adopting ICT solutions and innovative practices should be put in place, to benefit also SMEs.

Action 5

Moreover, the lack of professional skills represents a real problem for the sector. Therefore all initiatives aimed at improving professional skills and the attractiveness of the tourism and travel sectors are welcome. Anticipation of skills needs in the tourism sector is key to facilitate the adaptation of employers and employees to new technologies and new market trends.

It would be however desirable to introduce some measures to increase the attractiveness of tourism industry as employer (i.e. special financial advantages, etc.)

Actions 6, 7

Seasonality is a major feature in the tourism and travel sectors. Therefore, NET members are interested in any action that boosts demand in low season.

Actions 8, 9,  
10

The lack of proper information and data on the tourism and travel sectors hinders the proper understanding of the functioning and development of their activities, with an inevitable difficulty of having a strategic and coherent vision of the sector. Therefore, it would be highly valuable to have reliable and regular updates on the trends of the tourism industry. So, NET appreciates the measures envisaged in the Communication to consolidate the knowledge base for tourism.

In particular, NET would like to be consulted/informed on the work of the virtual tourism observatory.

What is  
missing?

*Actions to reduce administrative burdens to a minimum and partnership with relevant European, national and local authorities in order to work towards removing barriers, such as discriminating differences in tax systems, charging schemes and regulations, that hinder the development of tourism.*

## **2. Promote the development of sustainable, responsible and high-quality tourism**

Actions 11,  
12, 13, 14,  
15

The protection of the natural environment is a priority for all stakeholders in tourism, and sustainability will be the key for the development of tourism within the EU.

Adopting a sustainable attitude when making use of the tourism services should also be a responsibility of consumers/tourists. Therefore, NET finds interesting the idea of organizing awareness-raising campaigns for European

tourists as a means to promote sustainable tourism.

All initiatives aimed at promoting sustainability at European level should however take into consideration what is already in place at national and regional level.

In particular, the creation of labels for destinations and brands on quality should be carefully assessed with stakeholders, after an evaluation of what has been already implemented by the industry and by local authorities. In this regards, NET members do not favour top-down approaches by the EU and standardisation bodies but rather support market-driven and industry-based initiatives.

Furthermore, with regard to the quality of tourism services, the focus of policy makers at all levels should be on improving the conditions for investments in infrastructure and training. What is crucial is to help tourism businesses with sound policies that can facilitate investments and reduce administrative burdens, creating a favorable business environment.

Tourism entrepreneurs frequently exchange best practice information which serves to improve the attractiveness, quality and sustainability of the services within their respective sectors. This approach is preferred to attempts to impose European-wide standards which by definition lack responsiveness, flexibility and appeal.

### **3. Consolidate the image and profile of Europe as a collection of sustainable and high quality destinations**

The communication puts forward some actions for the consolidation of the image and profile of Europe in world markets. NET believes that, to achieve a greater promotion of Europe as top destination, measures to improve the convenience of travelling should be pursued such as easier to obtain and cheaper visa entry, interconnectivity of modes of transport, etc.

In addition to promoting Europe as collection of sustainable and high-quality tourist destinations, it is important to highlight its diversity.

### **4. Maximize the potential of EU financial policies and instruments for developing tourism**

NET appreciates the reference in the Communication to a better integration of tourism into its various policies. To boost the competitiveness of European tourism the first priority must be to ensure that tourism interests are taken fully into account in other EU policies. Therefore, the Tourism Unit should monitor all EU measures in the pipeline and identify the measures with a likely impact on tourism, and organize with the tourism industry consultations on all significant measures likely to affect its activities. The recognition of the socioeconomic importance of tourism must be translated into more attention being paid to the impact of the different EU policies and regulations on tourism enterprises.

For this purpose, it would be very much welcome by industry the creation of a new high level position as a full-time adviser for tourism within the

Commission, to act as a first contact point between industry and Commission officials.

What is missing?

*Moreover, to promote the various financial instruments existing at European level among the various actors of tourism, in particular SMEs, it would be advisable to update the publication "making best use of Structural funds" which briefly explains how small and medium sized businesses and representative organizations can obtain financial support for a huge range of projects and initiatives in the tourism and commerce sector.*

*It is important to facilitate the access of tourism companies to the European financial instruments. Many micro, small and medium enterprises do not have a sufficient knowledge of the European "funding system". Actions to make them aware of the possible financial instruments should be put in place.*