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*By e-mail and courier*

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CC:

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Director, European Commission  
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Head of Unit, European Commission  
Ms. Maria Aigner  
National expert, European Commission

Brussels, 30 January 2008

Dear Madam,

***RE: CEN feasibility study on accessibility criteria for tourist places + workshop on 13 February 2008***

Thank you for having invited HOTREC to express its views in relation to the study referred above.

HOTREC and its national associations agree that tourism services should be made accessible to those with reduced mobility through permanent or temporary disability or age wherever it is reasonable to do so. HOTREC also agrees with the approach by the European Parliament in its Resolution of 29 November 2007 on a renewed Tourism Policy, which “welcomes initiatives to coordinate at European level the information on accessible tourism that would allow tourists with reduced mobility and the families to find information on the accessibility of tourist destinations”.

However, we have the greatest doubts about the work currently undertaken by AFNOR for CEN. These doubts concern the following aspects:

- desirability;
- contents;
- responsible bodies.

## **Desirability**

AFNOR has started its work, without first checking whether the exercise is desirable. In a letter addressed to HOTREC (not dated), AFNOR clearly indicates that its analysis is done “*in order to demonstrate the need and possibilities for the use of standards*”. Thus the desirability phase has clearly been by-passed and, to say the least, the “objectivity” of the work of AFNOR is questionable.

The focus on “tourism” services is also causing us problems. Unfortunately, disabled people live with their disability throughout the year and not only when they go on holidays. Better access to all aspects of every-day life (streets, shops, administration buildings, financial institutions, cinemas, petrol stations, etc.), including holidays, should be ensured: there is no justification to tackle disabled people’s problems when they are on holidays as an isolated and independent issue.

## **Contents**

HOTREC is opposed to the development of European standards for accessibility criteria for tourist places. Unfortunately, “disability” is unique to each disable individual and it is impossible to achieve sufficiently flexible, yet effective definitions.

A number of measures/schemes – whether imposed by law or/and developed on a voluntary basis, at industry or enterprise level – already exist in all EU countries. There is no reason why these schemes already in place would need to be reviewed on the basis of common, harmonised criteria. After all, the objective is to facilitate access for the disabled people and harmonisation cannot be a goal in itself. One-size-fits-all-solutions are certainly not the appropriate answer in this matter.

What is crucial is that information be easily available about those key elements that will enable the disabled customer to make a sensible judgement about whether, bearing in mind his/her specific needs, the tourist place (accommodation, means of transport, attraction...) is accessible. But this aim does not call for harmonised accessibility criteria throughout the EU.

## **Responsible bodies**

Standardisation work by the standardisation bodies is in no way a prerequisite for the improvement of availability of information on access to tourist places.

HOTREC is of the strong opinion that such an improvement could be achieved without the costly and burdensome intervention of the standardisation bodies. Together with the various platforms representing the disabled, the tourism sector should be able to coordinate, at the most appropriate level – local, destination, regional, national or European -, good practice guidance appropriate for all size businesses and meeting the expectations of the great variety of customers with special needs, while keeping the economic implications for businesses at a reasonable level.

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HOTREC will attend the meeting on 13 February 2008, but its participation should in no manner be interpreted as a support for the development of harmonised accessibility criteria by CEN. HOTREC would appreciate if this letter would be included in the file for the meeting.

Yours sincerely



Marguerite Sequaris  
CEO of HOTREC