

D-0607-181-EB

TO:
ENTR-sust-tourism@ec.europa.eu

CC:
Pedro Ortun
Francesco Ianniello
Alan Vella
Maria Aigner

Brussels, 25 June 2007

RE: PUBLIC CONSULTATION ON AN "AGENDA FOR A SUSTAINABLE AND COMPETITIVE EUROPEAN TOURISM"

Dear Madam, dear Sir,

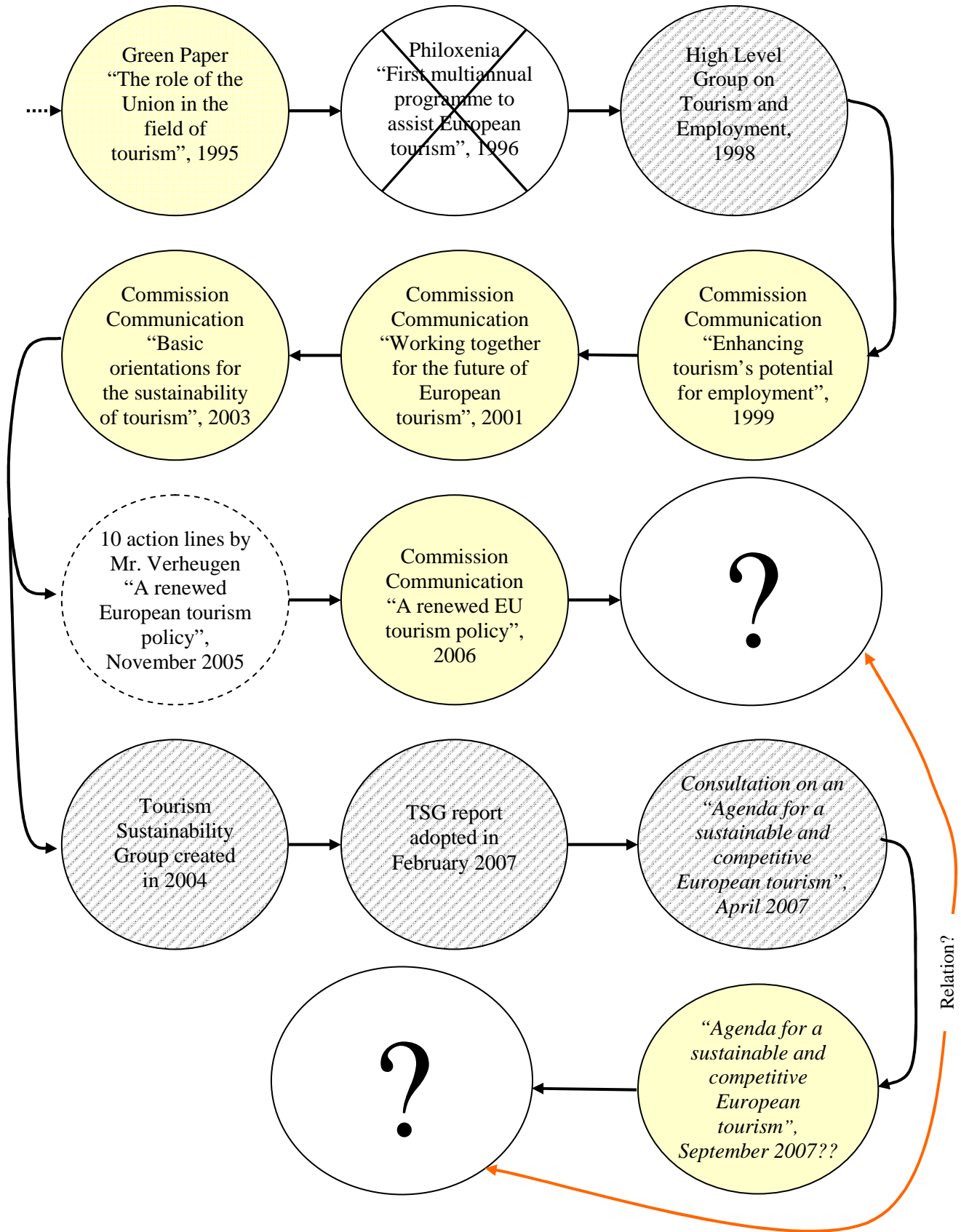
Thank you for inviting HOTREC* to reply to the consultation on an “*Agenda for a Sustainable and Competitive European Tourism*” based on the TSG report on an “*Action for more Sustainable European Tourism*”.

Background

Over the last 15 years, the European Commission has been announcing major changes in relation to an EU tourism policy. We took the liberty of summarizing the various steps in this long-lasting exercise in a “*snake*” form:

* HOTREC represents the hotel, restaurant and café industry at European level. It counts 1.4 million businesses, with 92% of them being micro enterprises employing less than 10 people. The micro and small enterprises (having less than 50 employees) in the hospitality industry representing 99% of businesses make up some 64% of value added. The industry provides some 8 million jobs in the EU alone. HOTREC brings together 39 National Trade and Employer Associations representing the interest of the industry in 24 different European countries.

Main actions taken at Commission level in relation to Tourism 1995-2007



There was a very promising step in the development of this “snake”, i.e. the announcement by Commissioner Verheugen, in November 2005, of “10 action lines”, along which the further activities of the Tourism Unit would be developed. Unfortunately, the subsequent documents focus only on some aspects of these “10 action lines”, and neglect many aspects of main interest to the industry.

TSG report

We are of the general opinion that the TSG identified correctly the various challenges facing the tourism industry.

However, the overall approach (*holistic*, to use the current EU jargon) - which can also be found in the concept of “*Corporate Social Responsibility*” - implies that all aspects listed below, and identified in the TSG report as “Aims”, are considered as equally important:

“1 Economic prosperity

- a. To ensure the long term competitiveness, viability and prosperity of tourism enterprises and destinations.*
- b. To provide quality employment opportunities, offering fair pay and conditions for all employees and avoiding all forms of discrimination.*

2 Social equity and cohesion

- a. To enhance the quality of life of local communities through tourism, and engage them in its planning and management*
- b. To provide a safe, satisfying and fulfilling experience for visitors, available to all without discrimination by gender, race, religion, disability or in other ways.*

3 Environmental and cultural protection

- a. To minimise pollution and degradation of the global and local environment and the use of scarce resources by tourism activities.*
- b. To maintain and strengthen cultural richness and biodiversity and contribute to their appreciation and conservation.”*

For years, HOTREC and its member associations have been asking that specific attention be paid to what is now listed as “Aim 1 a)” of the TSG report: *1. Economic prosperity - a. To ensure the long term competitiveness, viability and prosperity of tourism enterprises...*

I. Listing and ranking of challenges in the consultation

Whereas we acknowledge that the 8 challenges listed in the report reflect a wide-ranging approach to sustainability and that all are worth considering, we do not agree that each of them concerns to the same extent the aim of “*Economic prosperity*” of our enterprises, as described above.

Tickling and ranking of challenges

The subject matter is really too complex to allow for such an appreciation of the challenges:

- 1) The ticking/ranking will vary with the aspect of sustainability favoured (e.g. economic prosperity, quality of life of local communities, etc.);
- 2) The ticking/ranking will vary with the each sub-sector of the industry concerned;

- 3) The ticking/ranking will vary with the local/geographical/cultural circumstances;
- 4) Furthermore, we fear that the ranking of the challenges as “Very important”, “Important”, etc. lead to a too easy addition and, therefore, misleading overview of the results of the consultation.

II. Responsibility to be addressed by our group of stakeholders – the hospitality industry – in relation to the wide-ranging concept of “sustainability” as described in the TSG report

HOTREC and its 39 national associations in 24 countries are reviewing constantly their responsibility in relation to the hospitality enterprises they represent.

In each of these 24 countries, numerous initiatives are taking place to respond to the various aspects of sustainability referred to in the TSG report and these actions will continue.

III. Recommended actions at EU level

1. Suggestions for actions by the Commission Tourism Unit in relation to sustainability

In line with our comments of February 2006 on the “10 action lines” proposed by Commissioner Verheugen in November 2005 we reiterate that “sustainability” should also include commitments by the Commission to:

- Not propose unnecessary regulation (which includes the commitment of proper impact assessment of all measures likely to impact tourism);
- Not seek to impose standards when those can be elaborated through voluntary self-regulation;
- Work to cut red tape and modernise existing regulation;
- Coordinate the Community actions affecting tourism.

2. New approach: standards, voluntary schemes, platforms of exchange of good practices

Whereas HOTREC and its member associations are already working on closer, industry-based, benchmarking, bottom-up approaches to the common issues they are facing, they do not favour any Community action in relation to:

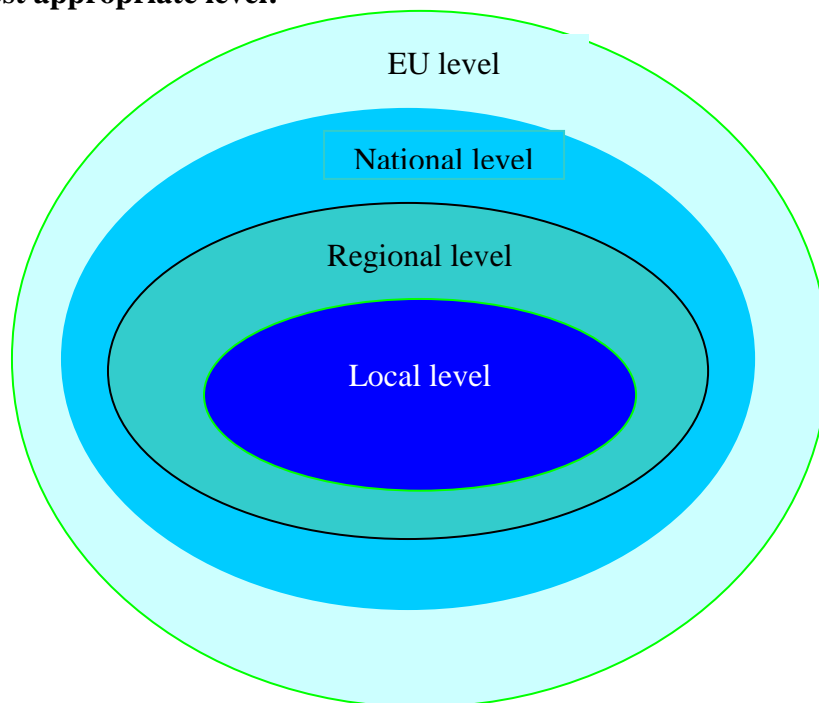
- Standards not initiated by the industry itself;
- Certification schemes not related to standards initiated by the industry itself and which benefit mainly the certifiers;
- Classification schemes, which should be left to the responsibility of the industry and of national/regional authorities;
- Setting-up of networks to organise the exchange of best practices: HOTREC is opposed to the setting-up of any Platform in the field of tourism, based on the model of the Nutrition and Alcohol Forum: much too burdensome for the concrete

results to be expected! Since years, national associations have been usefully exchanging best practices within their European umbrella organisation.

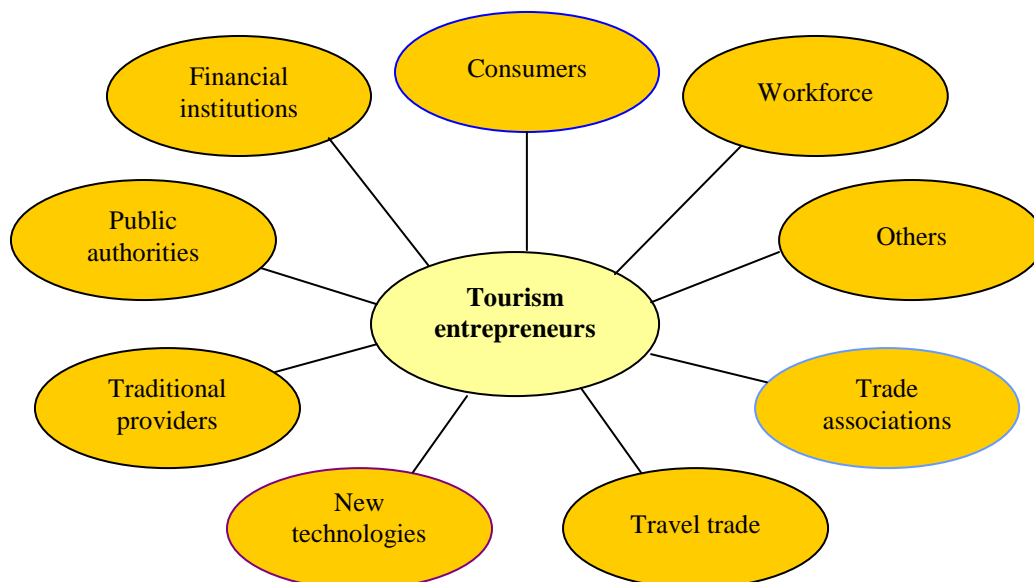
IV. Concrete proposal

Action is now needed...

At the most appropriate level:



Via full partnerships of all stakeholders:



* * *

HOTREC is looking forward to discussing further with the Commission the “Agenda”, which it plans to issue in September 2007.