

Commission Communication to the Council, the European Parliament, the Economic and Social Committee and the Committee of the Regions
“Working together for the future of European tourism”
COM (2001) 665 final

Comments

On 31 August NET welcomed the Outline for the Communication circulated in July. We have now compared this Outline with the final Communication and are disappointed to note that the Communication does not meet the expectations raised by the Outline.

With the exception of the points covered below, the Commission’s Communication adds little that is new to the debate on Tourism Policy in Europe and does not address the very serious concerns of the organizations that comprise NET’s membership.

Diversity

The Communication includes the phrase: *“Because of its diversity and fragmented nature, the tourism sector has no clear identity”*. “Tourism in Europe: united yet diverse” is a reality which the Institutions must learn to recognise. The diversity of the sector is integral to the industry’s identity and is intrinsic to its success. The Commission should seek to embrace this in the same way the industry has done.

In such a diverse sector, a single voice can only be heard on general issues.

Consultation

According to the Communication, this will be achieved through an extension of the Tourism Advisory Committee to “expertise” from industry and an annual European tourism forum. NET welcomes the confirmation of the involvement of industry in the TAC discussions. In our comments on the Outline, we also welcomed the announcement of an Annual European Tourism Forum.

But in the final Communication we see no reference to the participation of the sectoral associations in the Forum: *“The Forum will bring together high-level figures from the industry, civil society and the European, national and regional authorities responsible for tourism”*.

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“High-level figures from the industry” implies that the Commission will invite CEOs of major companies rather than European sectoral associations.

Europe’s tourism industry is dominated by SMEs with 99% of enterprises employing less than 250 people. The vast majority of the businesses in the tourism sector are micro-enterprises (employing less than 10 people). The Commission's own figures show that in 1997 tourism SMEs represented 7.4% of all SMEs in Europe, 94.2% of which were micro-enterprises. The proper representation of the sector is through the European associations and not through a partial and *ad hoc representation* from individual companies. It is only through membership of their respective sectoral trade body, that the SME's can articulate their views to the authorities.

Sectoral associations represent both large and small businesses. At least at that level, the “single voice” – so much desired by the Commission – is a reality. Therefore, it would be more sensible and transparent for the Commission to deal via the European sectoral associations to get the views of tourism enterprises of all sizes.

The Forum should be an annual co-operative event, i.e. jointly run in terms of agenda fixing by the Commission and the new “European tourism industry network”, but with administration done by the Tourism Unit. It should be part of the Tourism Unit’s regular responsibilities to organise its consultation with the industry through the Annual Forum. In order for the event to be successful, only the Commission can effectively act as the independent broker.

Impact Assessment of Measures

The Communication acknowledges *“many Community policies and measures involve tourism stakeholders and directly influence their activities”*.

In order to render such measures effective, an “impact assessment” of each of them - when they all still at the proposal stage - must be an integral part of the Commission’s strategy. Business impact assessment or cost/benefit analysis of each proposed measures under any Community policy is the most effective way in which the Tourism Unit can facilitate the development of tourism. It should be the priority activity of the Tourism Unit commanding the largest share of its resources.

But in the Communication there is only a consideration of *“mechanisms”* for *“ a more systematic assessment of Community measures”*: more systematic than what?

The Tourism Unit presently carries out no assessment whatsoever. Europe’s tourism industry needs a business impact assessment for each proposed measure.

The short-term priority should not be the Sixth Framework Programme and “information society technologies”. This text is far from being a top priority for the tourism industry, which is much more concerned about taxation, transport, consumer protection and competition issues.

For example, the recently published “White Paper on transport” failed to recognise the need to accommodate tourism-related transport in this document. An impact assessment in tourism terms would, we are sure, make a substantial contribution to the Commission’s deliberations on the subject of transport.

Co-ordination

The announced “improved coordination between Commission services”, which NET welcomed in its comments to the Outline is omitted from the final text of the Communication. NET has for years requested that the Tourism Unit focus on the co-ordination of all measures emanating from the various services of the Commission that have an impact on the tourism sector.

The Communication has acknowledged the diverse nature of the tourism sector yet fails to co-ordinate the wider Commission’s role towards the industry. They call for one voice, but provide many ears.

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NET does not believe that the Communication sets out a proper blueprint for better “*working together for the future of European tourism*”. On behalf of our members in the tourism industry, NET will make its views known at the TAC meeting on 12 December and at the hearing to be organized by the EP Committee on Regional Policy, Transport and Tourism in February 2002.

Brussels, 10 December 2001

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