

September 2021

MBB feedback to Consultation on Tourism Transition Pathways

What additional or different issues would you propose to be ambitiously considered for the development of a resilient tourism ecosystem?

Resilience:

1. On improving the EU capacity to manage shocks affecting travelling, any EU preparedness for coordinated action in exceptional circumstances must ensure to be upheld by the member states and once agreed considered to be binding. It is counterproductive to have EU policies in place which are then disregarded and replaced by unilateral actions.
2. On improving the effective leverage of funds, relying on promotion of funding opportunities by EU and national authorities is insufficient. SME's and particularly micro enterprises are at the very end of the chain and thus first it must be ensured that national development banks or other financial intermediaries are accessing every programme and making them available. Furthermore, EU funding schemes must be designed in a way that truly appeal for SME's to tap into, whether from an administrative perspective or as an incentive to undertake specific investments.
3. On enhancing cross-border cooperation with resilient policy instruments for sustainable tourism, one must also consider the limited capacity and/or resources of stakeholders as well as operators. Cross-border cooperation initiatives should be simplified processes and complemented by capacity building elements for participants.
4. On health and safety protocols through developing safety seal and integrated quality labels, these should be the product of clear, consistent and coherent policy measures across member states. One cannot create confidence in a label if the rules keep on the sanitary front keep changing. Furthermore, adopting health and safety seals should not come at a cost to tourism operators, firstly due to the financial strain the crisis has placed them in, and secondly because this can be viewed as a public service. Service safety protocols should be harmonized for tourism service providers as inconsistencies between member states can be confusing for customers.

5. On improving access to tourism and reducing regional vulnerability, allocating targeted funding to improve accessibility for people with disability and reduced mobility is a good policy measure. This should be provided in the form of grants and through simplified procedure. However, we do not see the relevance to the reference of teleworking under this point. Nevertheless, tourism is an interactive sector relying on inter-personal contact and thus opportunities for teleworking are limited.
6. On digitalization of visa and travel documents, this will be a welcome development. Nonetheless, one must ensure the highest due diligence and tech-proof systems for data processing and general security.
7. On supporting competitive, resilient and innovative tourism business, please refer to point 2.
8. On skilling approaches for the tourism workforce, one must ensure that sufficient investment goes into educational institutions dedicated to tourism professions as well as other funding for training programmes undertaken by industry. However, the biggest challenge is that of attracting people to work in tourism. Investment needs to be put into communication and marketing campaigns to instill a sense of pride in those considering a career in tourism. In addition, awareness campaign should be done encouraging the public at large to be more appreciative towards the tourism workforce. Labour supply has been a concern for tourism operators across many EU states and has become more pronounced in recent months during the recovery period. Operators in the sector have been constrained to limit their operational capacities due to shortage of staff. Tourism suffers from negative perceptions fueled by sweeping statements about the sector which are often triggered by insufficient or incorrect data. The nature of the tourism business operates differently than other economic sectors, because of fluctuations, seasonality, temporary employment to meet high season demands etc., and official data needs to be well disseminated and interpreted when compared to other sectors. It is unfortunate that benefits of tourism employment are rarely mentioned or reflected in official statistics. A review of methodologies that can decipher data to give a clearer picture should be considered, and a campaign to promote the positive aspects of working in the sector should be embarked and pursued across all member states. This will help to encourage prospective candidates that are considering a career in the sector. If the issues of labour supply is not addressed this will translate to a limiting factor for tourism growth and will present itself as a challenge to long term sustainability of the sector.
9. On insufficient knowledge base of the tourism ecosystem and the proposal for better data collection by member states, it must be ensured that such data collection would be voluntary, processed in aggregate manner, and requests should be timely without overburdening stakeholders or operators.

Sustainability:

The document inevitably refers to the various issues related to a sustainable tourism ecosystem. During pre-covid time we were facing issues related to 'over tourism' and a number of destinations experienced different forms of 'protests' by local communities who considered that their tolerance level had been exceeded because of higher number of visitors which was impinging on the quality of their lives in more ways than one. We know that over tourism is mainly linked to increased level of activities in highly visited cities, and in some instances in island states. Therefore, we need to have in place specific tourism policies that address city tourism to alleviate daily pressures on the local inhabitants, which has risen exponentially over the years. One of the main causes was unregulated short-term rental (STR) and similar accommodation offered. STR requires strong regulation not only to ensure a level playing, but to ensure that the quality of life in homes and within prime private residential communities are better 'protected' from tourists. Cities must do more to manage numbers and more to ensure that local inhabitants do not become 'second class' citizens in their own city. We need to see that local inhabitants are not pushed to a level where they become hostile to visitors because of undue increased pressures, as this will be counterproductive. Carrying capacity undertakings for cities should be drawn to operate within a controlled growth scenario. This is also essential to manage sustainable goals targets related to climate change commitments.

Further comments on the actions indicated in staff working document.

1. On unsustainable mobility with high carbon footprint, we agree in favour of a transition to carbon neutral travel option. However, it must be ensured that the price for travel remains affordable for all segments of society. Special consideration must be also made for islands that depend entirely on aviation and maritime for the movement of people. Any burden placed on operators must be proportional and should ensure the continuation of service provision at reasonable costs for travelers.
2. On the lack of shared framework for sustainability monitoring and proposal for tourism destinations to subscribe to EU Sustainable Destination Charters. While destinations should all aspire to meet such goals, the charter must acknowledge the different starting point of the relevant destinations for the different key performance indicators (KPIs) and allowed reasonable pathways to reach the end objectives. Efforts should be made to promote the use of common sustainability measuring methodologies and tools to facilitate benchmarking between destinations.

3. On low involvement of tourism destinations and industry in climate change prevention and adaptation, it must be also ensured that tourism operators and their business representatives are properly consulted in the spirit of partnership while developing any climate change prevention and adaptation plans in order to ensure that industry is fully engaged in the implementation process.
4. On insufficient green and local consumption and the use of sustainability values and tools, there is clearly a need of further promotion of environmental footprint tools developed at EU level for a better take-up by industry. With regards to expectations on the contribution by the hospitality sector to reduce pollution, water use and plastic waste, this needs to be accompanied by policy tools and market driven solutions that are also commercially viable. This also must be addressed through persistent educational campaigns among the public.
5. On insufficient energy efficiency or renewable energy in buildings used for tourism, this must be addressed in planning policies for new buildings and complemented by direct engagement with operators, possibly by involving representatives of the sector to encourage the take up of climate friendly solutions. Efforts need to be in place to ensure that every new development follows green building principles at planning and more importantly at execution stage as these have longer term benefits. Huge benefits can be reaped if new development is more strictly regulated as this will have long term implications. This will also facilitate energy efficiency management programmes and subscription of eco labels. This process would be made simpler if adopting such solutions have a quick return on investment.
6. On the lack of update of sustainability schemes and strategies, also referred to as eco-labels, we are concerned that there are too many labels and this can create consumer confusion that reduces or eliminates the value of eco-labels. Eco-labels are not very effective unless they are well promoted with consumers. One way of starting would be to work with online distribution channels, which is characterised by few major players, and who can play an important role to promote eco certified tourist establishments, as is suggested in the subsequent action point of the staff working document. Given the developments and demands related to eco-friendly practices, Eco-labels should fundamentally be reviewed and updated to reflect the realities and developments we are experiencing through rapid climate change scenarios.
7. On the need to need to incorporate sustainability as one factor in the quality rating of tourism establishments. In the first place HOTREC already provides a uniform star rating system, which already is represented by 17 European state, so the set target is already more or less achieved. However, star rating should not be associated with quality as classification and star rating models are based on the tangible provision of services and

facilities and do not measure the level of quality. Quality should not be associated with ratings, as this should be offered irrespectively. Star ratings are there to guide visitors on the level of service provisions and are not indicative of quality achieved. We must aim for tools that can measure the level of quality of the service provision, which requires different methodologies than that adopted for star rating. Nowadays customers rely on customer ratings, and platforms like Tripadvisor, which do not always reflect genuine or qualified sentiments, though they serve as a good indicator. Methods need to be introduced to measure quality in a regular and consistent manner based on the quality of facilities provided and service provision.

Digitalisation:

1. On unfair practices in the collaborative economy. A legislative initiative on short-term accommodation and rental services would be welcome in order to ensure a fair level playing-field among all operators in the sector.
2. On low level of digitalization among tourism SMEs. Funding support, preferably through grants and accessible in simplified format would help greatly tourism SMEs, considering other investment priorities in the context of recovering from the Covid-19 crisis.

What additional or different common output scenarios for 2030 would benefit the development of a sustainable tourism ecosystem? Please propose concrete targets for 2030 and milestones for 2025 to measure progress.

We disagree with common output scenarios as presented in the staff working paper as these indicators are subjective and not based on any methodology or subject to an impact assessment.

What should be the actions, roles and responsibilities to reach these objectives for each of the Commission, Member States / Regions, Industry, Destinations and other stakeholders?

The responsibility of the Commission would be to oversee that member states are implementing the actions in a timely manner.

Member states should ensure that meaningful consultation is done with representative organization prior to rolling out policy and legislative initiatives that would impact tourism operators.

Industry needs to do its utmost to support public authorities with the implementation of policy frameworks and legislation and ensure compliance. This will help cushion the impact of future sanitary crises and also help reach the climate objectives which is in the interest of the industry itself to protect.