

NET position on standardisation of tourism services

Preservation of the diversity of tourism across Europe

NET is not opposed to standards *per se*. We recognise the importance of standards related to goods to both manufacturers and consumers. We appreciate that there is also a need for service standards in some sectors.

We would argue, however, that there is no such need for the tourism industry, and there is no support from the sector itself. Tourism's success depends on diversity and innovation. As the October 2010 meeting of the Competitiveness Council noted in its discussion of the new EU framework for tourism policy, the large number of SMEs in the tourism industry provide considerable added value through the diversity of their products and services.

Tourism services reflect differences in culture, location and approaches to hospitality, the driving force of people travelling and exploring the differences around the world. Tourists' needs and expectations vary; they are by their essence not uniform and standard. Businesses need the maximum possible flexibility to be able to meet those needs and live up to those individual expectations – and to be free to innovate in doing so.

To achieve any agreement on tourism service standards, by keeping the essence of tourism, these standards would have to be set at such a low level as to be of no interest to the industry and of no benefit to the consumer.

Difficulties in the standardisation process

NET members and their own member associations/companies have considerable experience of the standardisation process at (i) national level (mirror committees of the national standardisation bodies), (ii) European level (CEN Technical Committee 329 on tourism services) and (iii) international level (ISO Technical Committee 228 on tourism and related services).

Participation in the standardisation process is not without difficulties. These are particularly telling for the tourism industry, characterised as it often is by family-run small and medium-sized businesses (SMEs) which lack the resources to be involved individually and who look to their trade association to represent their interests.

The cost of participation and the time involved

Participation in standards work is expensive and time-consuming, especially when the sector does not see the benefits of the standards being developed. Full participation is open only to members of national committees. At least in Europe, industries concerned about the development of a standard must take part both in national working group and committee meetings and the relevant European and international committee meetings.

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Our experience is that representation on working groups and committees is poor and likely to be driven by a few parties who have the resources to take part and pursue their own individual interests and agendas.

Industry representation - Liaison status

SMEs (including a vast majority of often family-run micro enterprises) make up the vast majority of tourism entrepreneurs who depend on their membership of trade organisations and associations to keep them informed and represent them in standards meetings. Yet these same organisations have no voting rights in CEN and ISO meetings. They merely have the right to participate as observers – “liaison status”.

A lack of transparency

National Standards Bodies (NSBs) are expected to have consulted trade interests in their own countries before deciding the line that their delegates will take at European and international meetings. Sometimes this happens; sometimes it doesn't. Standards bodies work in a closed environment. Key industry stakeholders are often not consulted and excluded before the process even commences. There should be wider and earlier consultation of all standards proposals, without the need to be affiliated to the standards body and pay a membership fee.

When standards become mandatory through legislation

Standards are said to be voluntary. Standards are, however, already used in litigation - even when the parties involved have not adopted the standard voluntarily. Formally incorporating standards in regulation effectively makes them mandatory, not voluntary. This is a serious concern in tourism, not least because of the sector's lack of confidence in the operation of the standards system. Moreover, given the numerous regulations and administrative burdens the sector already has to comply with, it is difficult to expect a sector composed of 90% of micro enterprises to comply with various additional standards.

Support from stakeholders

It may be that the current system works well in the development of standards for goods where the objectives are clearer and the process is prompted by a desire for common standards on the part of the relevant sectors. This has generally not been the case in the development of tourism standards so far.

A bottom-up, industry-driven approach is needed

Our experience has been overwhelmingly that the top-down approach predominates in tourism standards work as standards bodies themselves make the initial proposals. Yet standards bodies at all levels are there to facilitate, not to initiate or create, new standards.

Industry support is essential to any new standardisation proposal. Standardisation should always be market-driven. There is no substitute for the knowledge, experience and support which can only be made available through explicit and motivated industry participation.

An excellent example of this is the European standard on the safety of fairground and amusement park machinery and structures (EN 13814) which was developed with the full support and involvement of the amusement-park sector. It is a standard that meets a declared industry need and deals with aims and objectives that are both tangible and realistic.

Industry representation on national standards bodies

We know that some national standards committees lack industry representation. In such cases, their mandate to play a part in the process is surely questionable. This will not be an easy situation to address, but it is fundamental to restoring confidence in the process. For new standard proposals the consultation of the relevant sectors and their explicit agreement should be demonstrated to prove relevance.

Conclusion

There is currently no demand or support from the tourism industry for the development of tourism service standards. The strength of feeling in the industry has been plain for all to see in meetings organised both by CEN and ISO over the past year.

NET supports only proposals for standards that are market-driven i.e. where there is a clear, explicit and unambiguous support of the industry and clearly proven benefits for consumers and businesses alike. The current standardisation process does not offer sufficient safeguards for proper and correct industry representation.

The diversity of European tourism and its customers' needs and aspirations must be recognised by policy makers as comprehensively as it is understood already by the industry. Uniformity in the shape of inflexible European and international tourism service standards is not the way to promote this diversity and could be detrimental to the global tourism market.
