



EUROPEAN COMMISSION
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL

Service Industries
Tourism Policy

Public consultation on the European Tourism Label for Quality Schemes initiative

13 April- 13 July 2012

1 EMPIRICAL FINDINGS

1.1 *The online consultation through “Your Voice in Europe”*

The European Commission conducted an open consultation via the Your Voice in Europe portal on the European tourism label for quality schemes initiative¹ between 13 April and 13 July 2012. The consultation was part of the impact assessment exercise of the initiative and was analysed by the Centre for European Policy Studies (CEPS), who were entrusted by the Commission to carry out a study on the estimated impacts and possible legal instruments of the initiative.

The following sections analyse in various ways the results of this open consultation and are also included in the final report of the CEPS study published on the Commission's website:

http://ec.europa.eu/enterprise/newsroom/cf/itemdetail.cfm?item_id=6236&lang=en&title=Estimated%2Dimpacts%2Dof%2Dpossible%2Doptions%2Dand%2Dlegal%2Dinstruments%2Dof%2Dthe%2Dumbrella%2DEuropean%2Dtourism%2Dlabel%2Dfor%2Dquality%2Dschemes.

Two sources of data and information were analysed in order to make inferences on the results of the open consultation: (i) the 147 usable responses out of a total of 152 that were filled out by the respondents: we labelled these survey responses “usable” in order to distinguish them from the “non-usable” ones that featured a significant number of unanswered questions or contained bogus comments, which made them unreliable; and (ii) opinions expressed by the respondents in the “remarks” section of the questionnaire: as a matter of fact, instead of filling out the surveys, some respondents preferred to contribute to the consultation by sending written position statements. These position statements are fed into the interpretation of the results where appropriate. In addition Section 1.1.4 presents an overview of all the comments received.

Figure 1 below shows the breakdown of the results by type of participant. Professional associations / federations and public administrations constitute the majority of the responses (113 responses out of 147). Table 1 below presents in more detail the type of

¹ Initiative stemming from Action 13 of the Commission Communication on Europe, the world's No 1 tourism destination – a new political framework for tourism in Europe (COM (2010)352 final), 30 June 2010

respondents that participated in the questionnaire. The survey also included an “other” answer option, where respondents were asked to specify which organization they belonged to and why it was relevant to them to answer the questionnaire.

Figure 1 – Number of "usable" survey responses by type of respondent

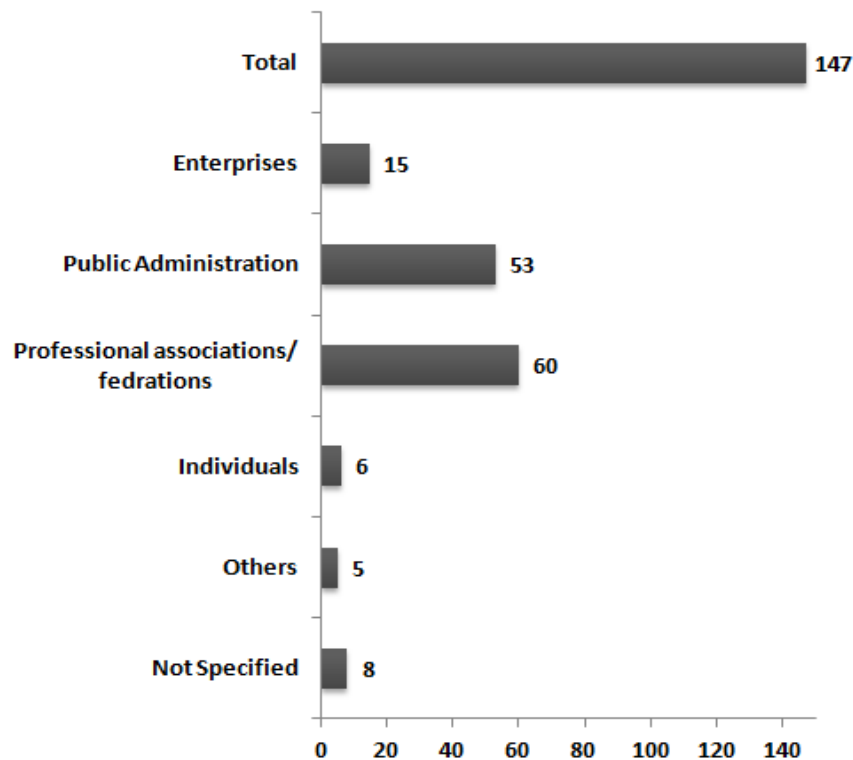


Table 1 – Breakdown of respondents to the online consultation

	Number of respondents
Enterprise	15
Tourism Related	11
<i>Part of a quality evaluation scheme</i>	3
<i>Not-Part of a quality evaluations scheme</i>	8
Non-Tourism related	4
<i>Part of a quality evaluation scheme</i>	2
<i>Not-Part of a quality evaluations scheme</i>	2
Public administration	53
National public administration	27
<i>Operates an evaluation/ labelling scheme</i>	14
<i>Doesn't operate an evaluation/ labelling scheme</i>	13

Sub-national public administration	4
<i>Operates an evaluation/ labelling scheme</i>	3
<i>Doesn't operate an evaluation/ labelling scheme</i>	1
Regional public administration	15
<i>Operates an evaluation/ labelling scheme</i>	8
<i>Doesn't operate an evaluation/ labelling scheme</i>	7
Local public administration	7
<i>Operates an evaluation/ labelling scheme</i>	1
<i>Doesn't operate an evaluation/ labelling scheme</i>	6
Professional Association/ Federation	60
Tourism Related	50
<i>Operates an evaluation/ labelling scheme</i>	26
<i>Doesn't operate an evaluation/ labelling scheme</i>	24
Non-Tourism related	10
<i>Operates an evaluation/ labelling scheme</i>	4
<i>Doesn't operate an evaluation/ labelling scheme</i>	6
Individuals	6
Others	5
Not specified	8

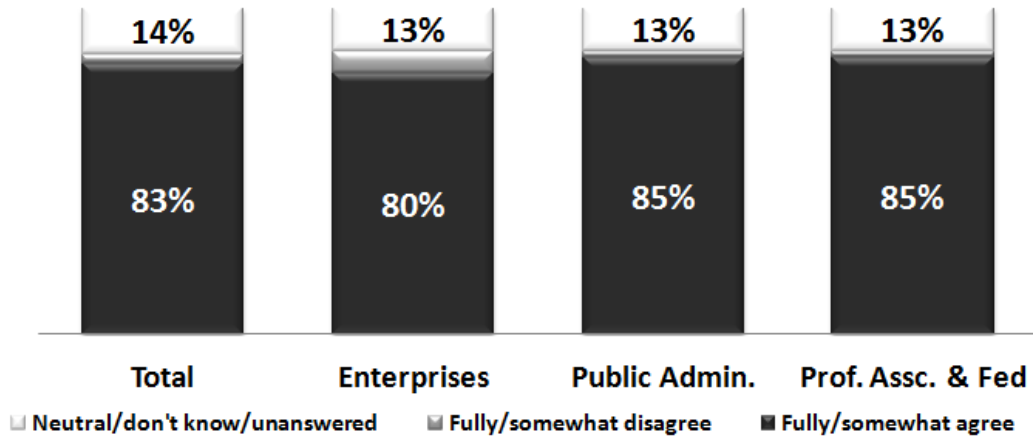
1.1.1 General questions

The consultation document asked respondents to evaluate and report to what extent they agreed or disagreed with certain statements reflecting the problem definition identified by the European Commission. Below, we show the results of the consultation for each of those questions.

1.1.1.1 Fragmentation and inconsistency between quality schemes

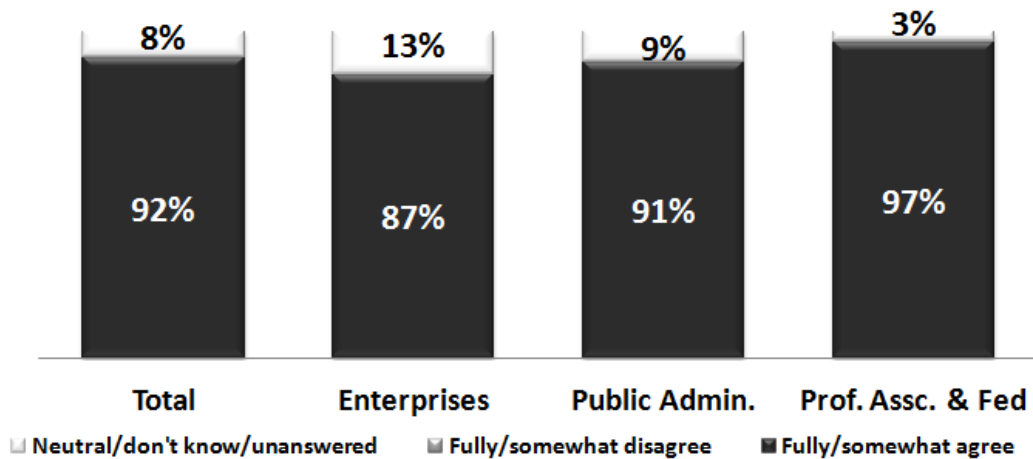
The overwhelming majority of the respondents (83%) stated that they either fully or somewhat agree that currently quality schemes for tourism are very fragmented, and feature significant inconsistencies. When looking inside the different categories of survey respondents, professional associations/federations and public administrations appear as even more in agreement with this statement (85% of responses).

Figure 2 – Responses to statement: “Quality schemes show little consistency and coordination”



Similarly, and even more importantly, as many as 92% of total respondents agreed that there are no consistent and comparable quality-related principles and criteria at European level. A percentage that reaches its peak among professional federations and associations (97%), which can be assumed to have a clear view of the level of information available in this field (most of the respondents in this category, 50 out of 60, are associations or federations active in the tourism sector).

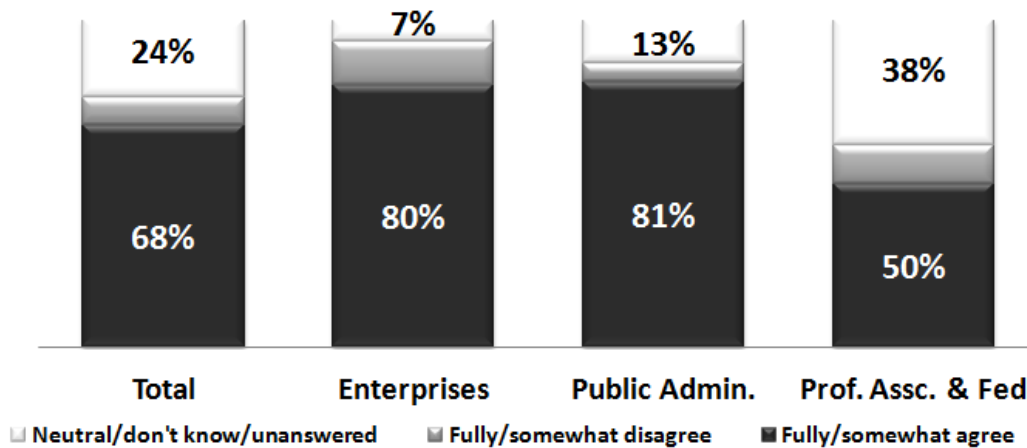
Figure 3 – Responses to statement: “There are no consistent and comparable quality-related principles and criteria at European level”



Also similarly, 68% of respondents agree that fragmentation can hamper the achievement of consistent quality levels across the European Union. This figure, however, is much greater for enterprises (80%) and public administrations (81%) than for professional

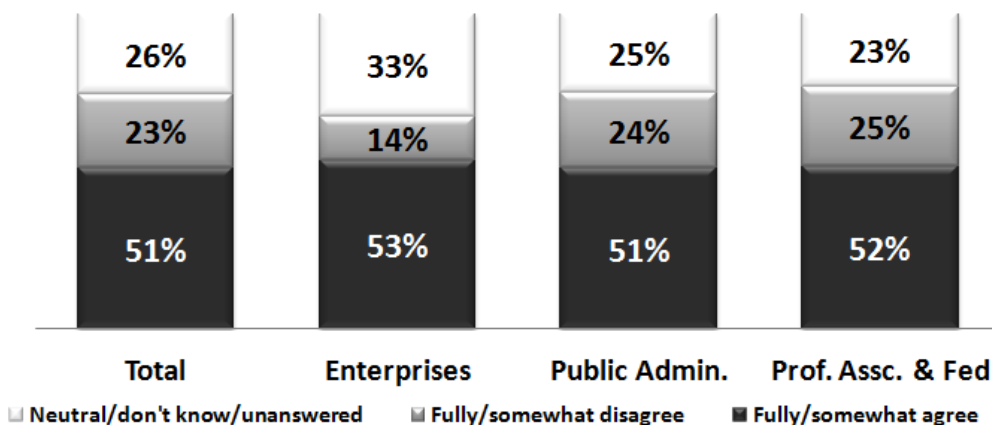
associations and federations (50%). However, it must also be observed, that a large share (33%) of respondents from professional associations and federations declared themselves neutral when prompted with this question. Accordingly, the low percentage figure does not imply disagreement with this statement.

Figure 4 – Responses to “Fragmentation can harm consistent quality of tourism at EU level”



In line with these answers, responses also highlighted agreement on the fact that Europe does not feature a single, consistent image as a set of high-quality destinations, especially when looking at non-EU tourists. Figure 5 shows that enterprises, in particular, agreed with this statement.

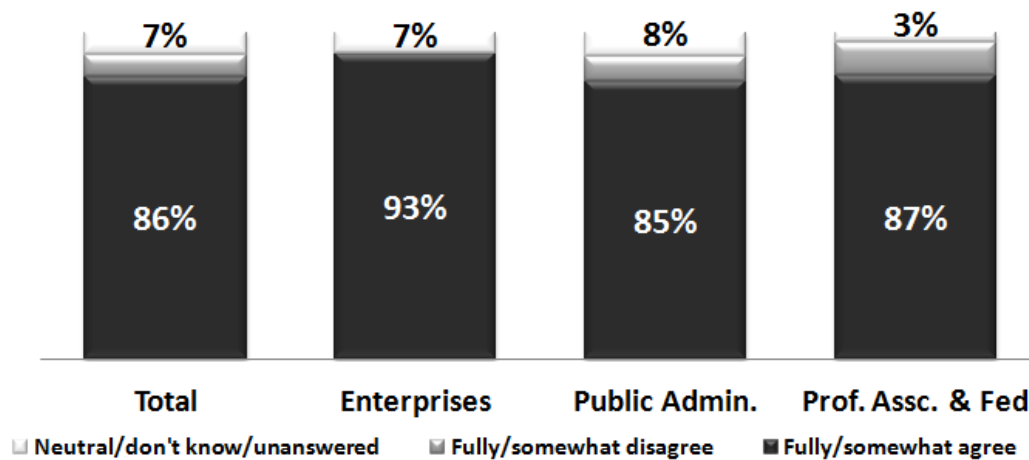
Figure 5 – Responses to “Europe as a whole lacks a clear image as a set of high-quality destinations”



1.1.1.2 Impact on consumers

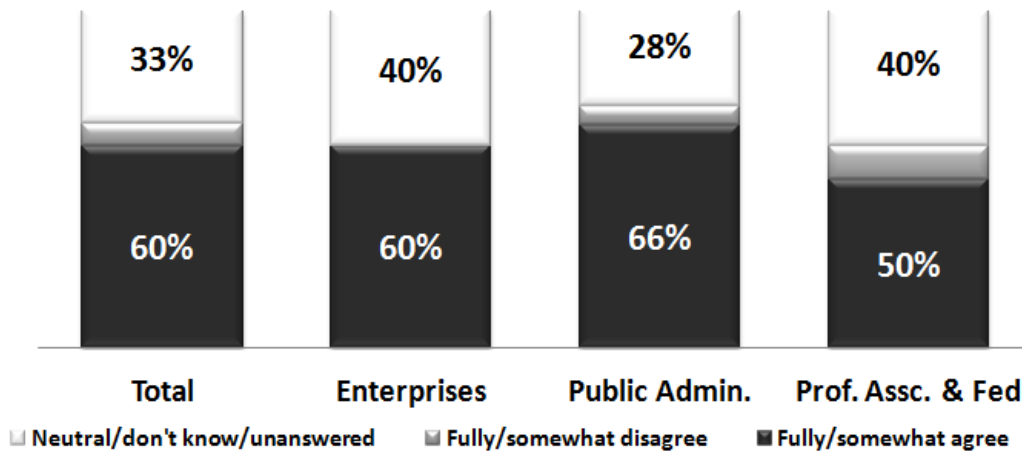
For what concerns statements related to the impact of the *status quo* on consumers, respondents have shown somewhat diverging opinions: for example Figure 6 highlights that a large majority of respondents agree that the current fragmentation between schemes and evaluation systems can lead to confusion for consumers, with 93% of surveyed enterprises somewhat or fully agreeing with this statement.

Figure 6 – Responses to Statement “the variety of schemes and labels leads to different quality levels, and hence confusion for consumers”



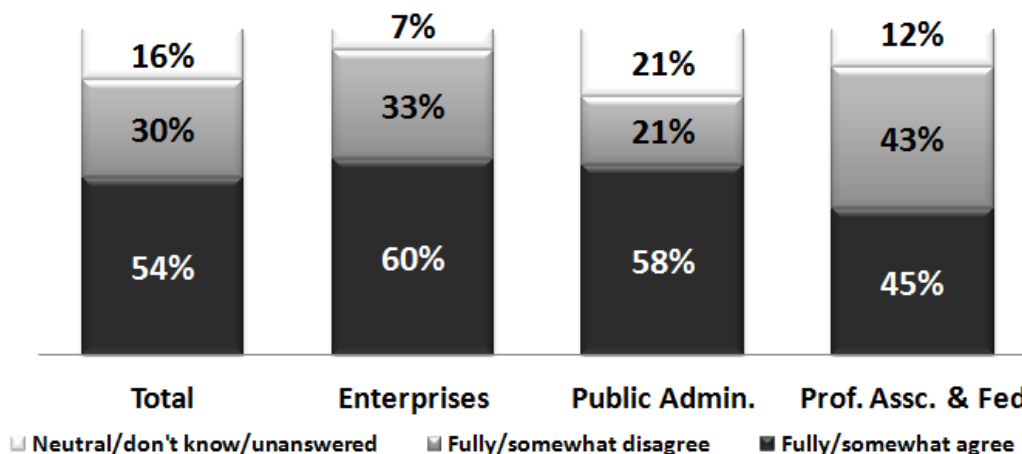
Other statements have, however, elicited a wider disagreement across groups of respondents. For example, Figure 7 shows that most respondents (60%) believe that information on existing quality schemes is not always available in languages that foreign tourists can understand: however, this is true for only 50% of professional associations and federations (many of them, however, have declared themselves neutral, not in disagreement).

Figure 7 – Responses to Statement “Information on existing schemes is not available in more than one language”



Similarly, Figure 8 shows that while the majority (54%) of respondents agreed that consumers’ trust is negatively affected by the complexity of the *status quo*, this figure hides a diverging trend between enterprises (60% of which agree with the statement) and professional associations and federations (which are almost equally split, with 45% agreeing, 45% disagreeing and 10% being neutral or not knowing the answer).

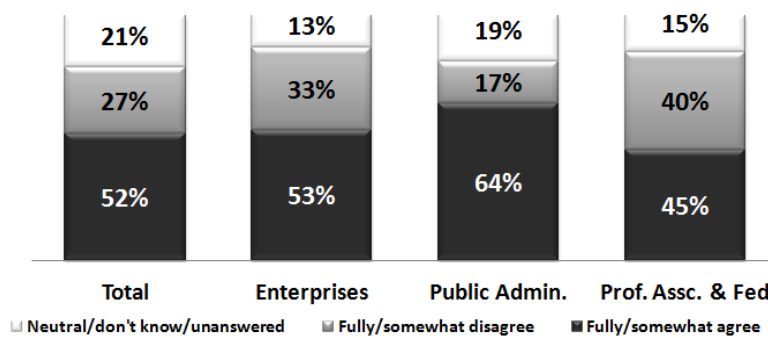
Figure 8 – Responses to Statement “Consumers often do not trust existing quality labels due to their complexity”



1.1.1.3 SMEs and quality requirements

Respondents were asked to report their opinion on one specific statement, relative to the level of preparedness of employees with respect to quality management schemes and practices. Interestingly, even if the majority of respondents (52%) agreed with a possible lack of sufficient skills and training, professional federations and associations (which are mostly from the tourism sector, and are also often involved in training initiatives for their members) are almost evenly split.

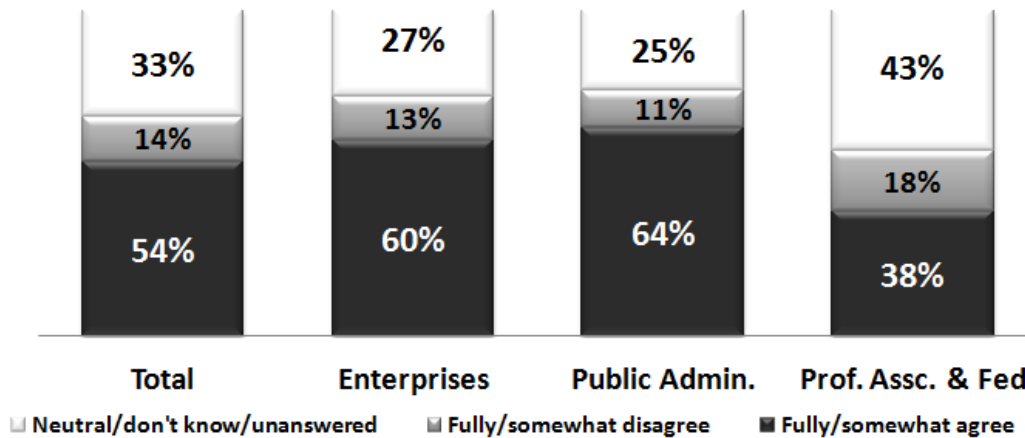
Figure 9 – Responses to Statement “Businesses and in particular SMEs may not have adequately trained and informed employees to ensure quality management”



1.1.1.4 Impact of the current situation

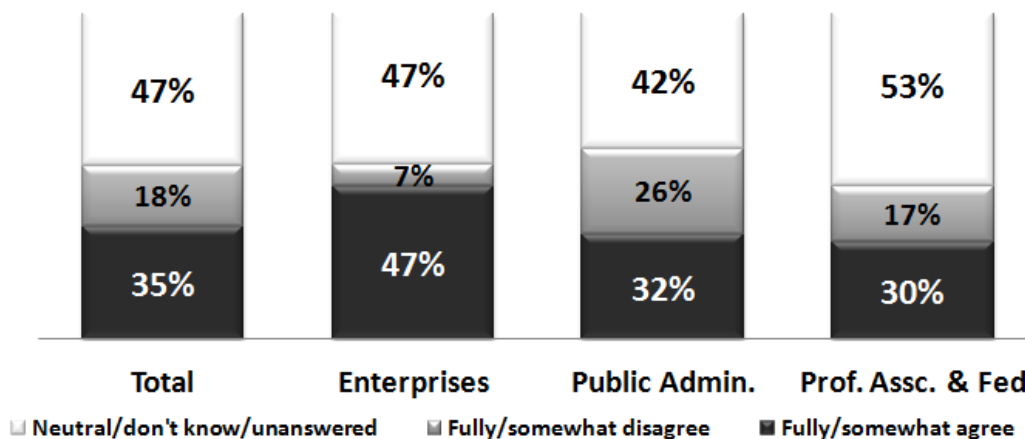
Disagreement among the respondents is more evident when one looks at responses to the statement related to the potential impact of existing fragmentation on the competitiveness of the European tourism sector. Figure 10 show that 54% of the respondents believe that the fragmentation is a potential harm to the competitiveness of the European tourism sector. Again, the percentage figure is much greater for enterprises (60%) and public administrations (64%) than for professional associations and federations (38%).

Figure 10 – Responses to Statement “Fragmentation can harm the competitiveness of the European tourism sector”



In line with these answers, figure below shows that many respondents are uncertain on whether Europe is indeed missing opportunities due to the fragmentation and partial inconsistency of its approach to tourism quality. Only 35% of respondents agreed with this statement, whereas almost half are either neutral, doesn't know, or did not answer this question. The number of neutral or unanswered questions reaches its maximum, in percentage points, among professional associations and federations.

Figure 11 – Responses to Statement “Europe is not entirely reaping opportunities at global level due to its incoherent approach to high-quality tourism services”



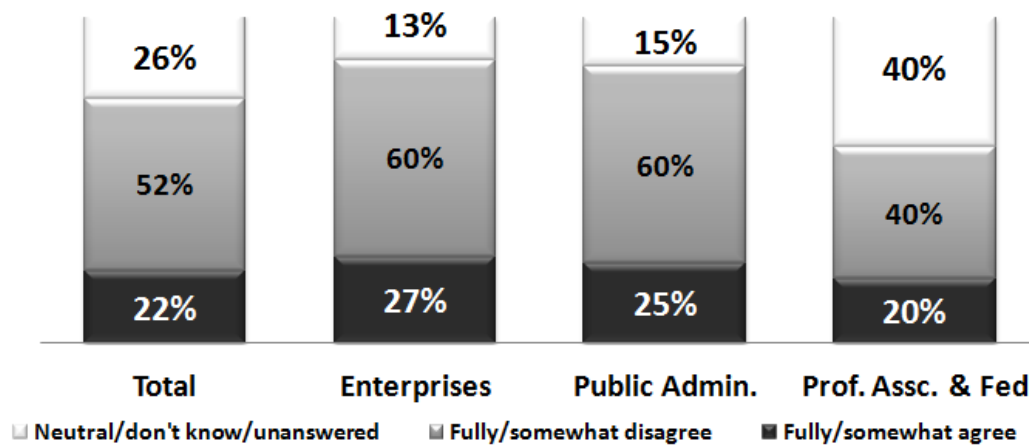
Overall, the results of the consultation show a wide agreement on the existence of a remarkable fragmentation in the existing criteria and principles applied to tourism quality in Europe, and a more balanced approach to the impact such fragmentation exerts on EU

competitiveness. Many respondents have declared themselves neutral when prompted with statements related to competitiveness, and more broadly to the broader consequences of the current situation: this can also be due to the technical nature of the questions – respondents might have felt more comfortable when reporting their perception as regards the existing fragmentation or inconsistency of quality levels across Member States, while they refrained from attempting to assess possible macroeconomic impacts.

1.1.2 The proposed quality scheme

In a second set of questions, respondents were asked to express their opinion on possible future actions by the European Commission beyond the simple endorsement of the *status quo*. Figure 12 shows that the majority (52%) of respondents actually disagreed with the statement that the Commission should refrain from acting. Most notably, on average enterprises and public administrations strongly disagreed with the statement. This suggests that there is demand for further action on the side of the European Commission, which goes beyond the current situation and seeks to achieve better coordination and consistency between existing quality schemes.

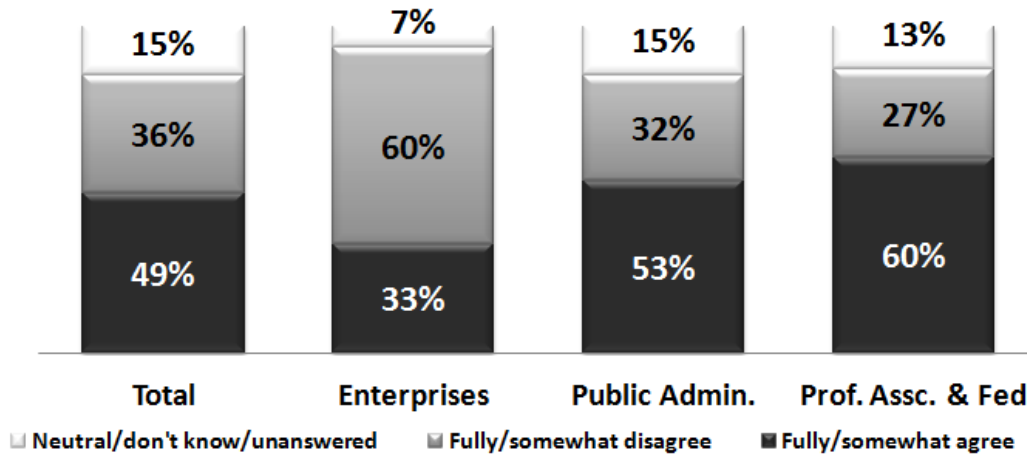
Figure 12 – Responses to Statement “The European Commission should not initiate any action in the field of quality evaluation of tourism services”



Against this background, it is important to ascertain whether such initiative by the European Commission should, according to the respondents, take the form of a “command and control” action, or a promotion of further coordination by private players active in the field. Figure 13 shows that respondents were split over the need for an EU-wide label, and that in particular – and not surprisingly – professional associations and federations are mostly against a new EU-level quality label. It must be recalled, in this respect, that this cannot be considered as an opinion on a possible initiative of a certification system of

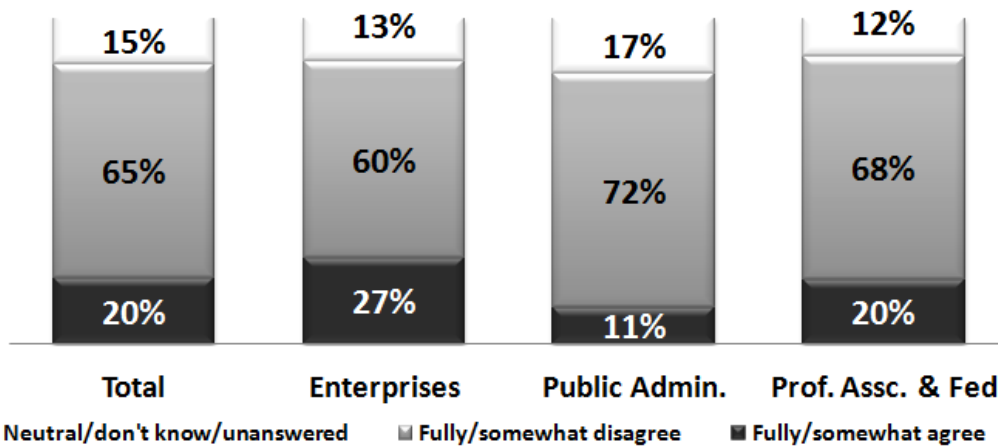
existing schemes, which by its very meaning is merely a consolidation of existing labels, rather than the juxtaposition of a new label over currently existing ones.

Figure 13 – Responses to Statement “The Commission should encourage and support current and future initiatives, without presenting a proposal for a quality label at EU level itself”



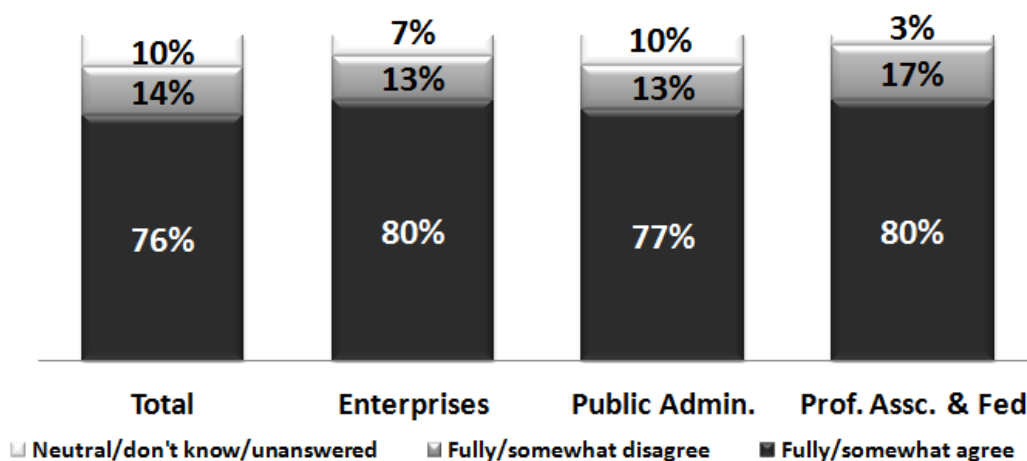
The respondents’ reluctance to approve the launch of a new quality label defined at EU level is made more controversial by the analysis of figures 14 and 15. Figure 14 tested the respondents’ opinions as regards the introduction of a “mandatory” (i.e., to be applied by all Member States) EU label which recognizes quality schemes and sets binding common quality criteria. In this case, approximately 65% of respondents rejected the idea, with public administrations being the most sceptical overall (72%). This in accordance with the additional comments given by the respondents (see section 3.1.4) where there is strong objection for a mandatory label.

Figure 14 – Responses to Statement “The Commission should introduce a mandatory label which recognizes quality schemes and sets common quality criteria for tourism services”



To confirm this impression, when asked whether they would support a voluntary initiative at EU level, which would recognise quality schemes and set common quality criteria for tourism services, the overwhelming majority of respondents expressed agreement. And even 80% of the professional associations and enterprises - the highest percentage across groups of respondents – saw this development with favour. The fact that the total (76%) for all respondents is less than the values reported for each of the three main groups of respondents is due to the very low share (33%) of individual respondents that fully or somewhat agree with this statement. Indeed, the percentage of those that somewhat or fully agree with the statement is 79% when only the three main groups of respondents are considered. Overall, these answers indicate support for a voluntary label among surveyed market players.

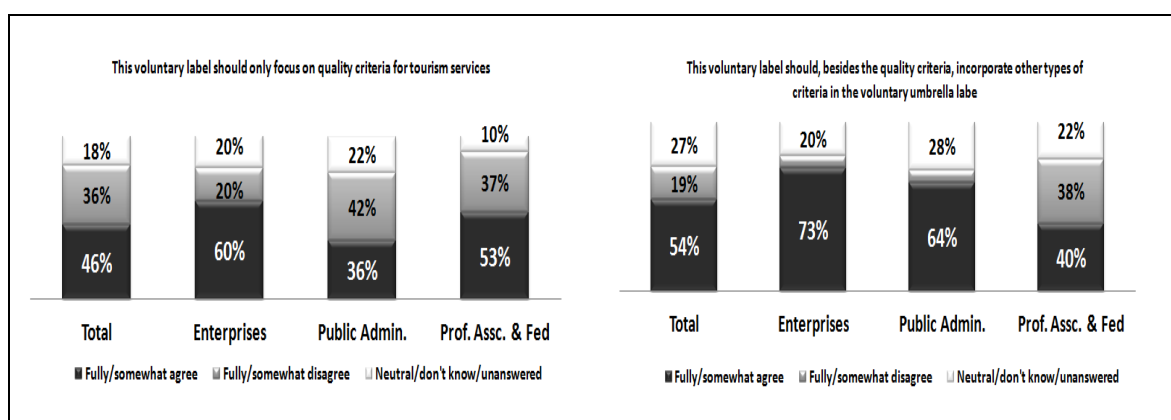
Figure 15 – Responses to Statement “The Commission should introduce a voluntary label which recognises quality schemes and sets common quality criteria for tourism services”



1.1.2.1 Scope of the proposed quality scheme

A number of questions in the online consultation were related to the possible content that the proposed initiative could feature. Figure 16 below compares responses to two questions, related to whether the future voluntary label should include only quality criteria, or also other criteria (e.g. sustainability). In particular: (i) there was much less disagreement on the second question, which might indicate that few respondents would be against going beyond mere quality criteria; (ii) the latter option was enthusiastically endorsed by enterprises and public administrations; (iii) professional associations and federations seem to prefer a pure quality-focused approach.

Figure 16 – Should the voluntary label include only quality criteria, or also other criteria?

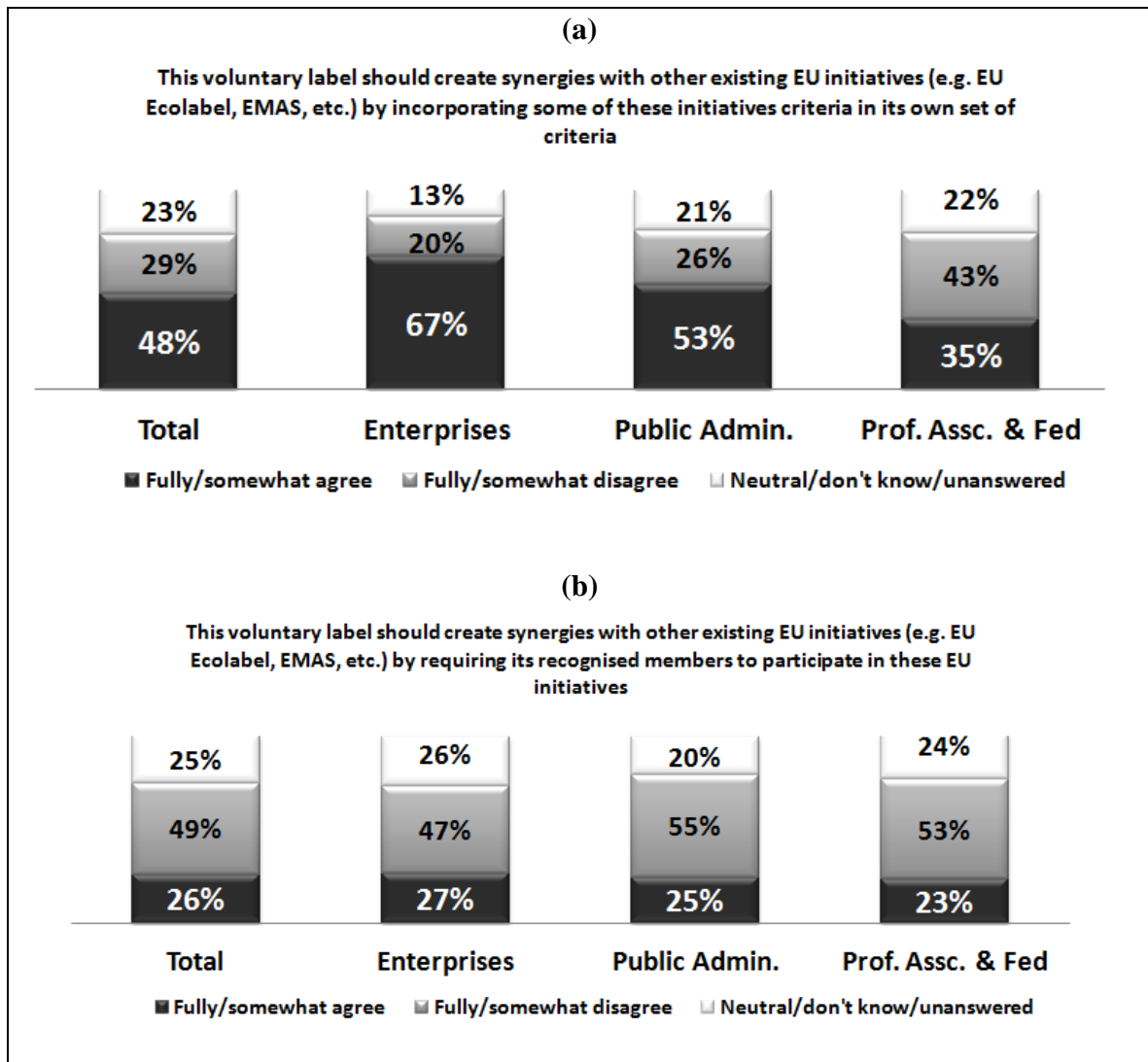


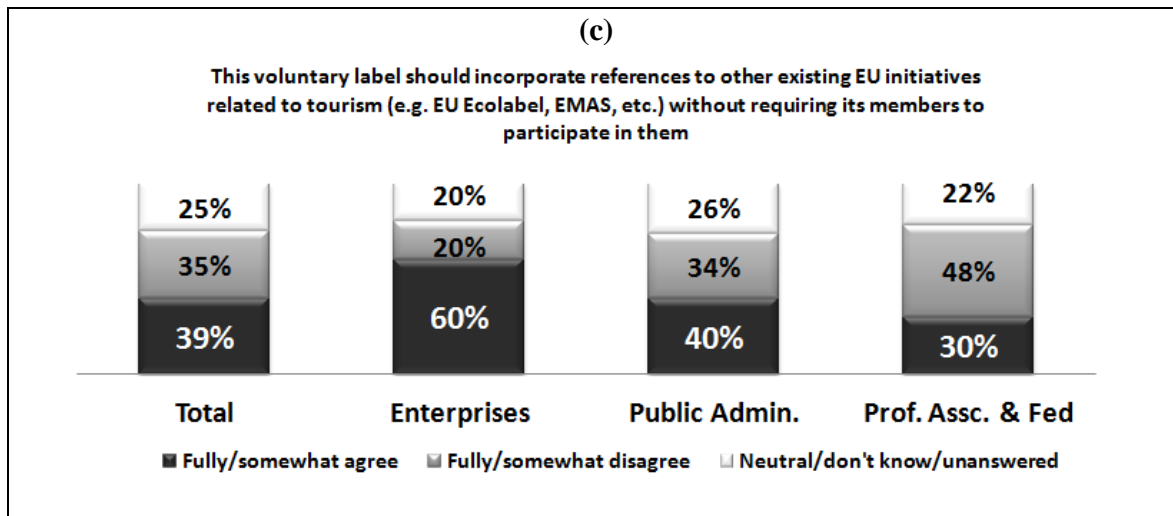
Further information can be derived from the answers to three other questions, which looked at possible synergies and overlaps between the future label and existing initiatives such as the EU Ecolabel and the EU Eco-Management and Audit Scheme (EMAS)². Figure 17(a) shows that 48% of the respondents are in favour of the incorporation of these other criteria into the voluntary label: however, many professional associations and federations (43%) have expressed disagreement on this option. The overall result for this question is mainly influenced by those associations/ federations that are active in the area of tourism, although other associations/federations report similar views. In particular, 48% of the associations/ federations that are active in the area of tourism (i.e., 50 in our sample) somewhat or fully disagree with this statement, whereas this percentage is 49% for associations/federations that are not active in the areas of tourism (10). Furthermore, 26% of the 30 associations/ federations that operate an evaluation/ labelling scheme somewhat or fully agree with this statement. The percentage of those that somewhat or fully agree with the same statement is 44% for the remaining 30 associations/federations that do not operate an evaluation/ labelling scheme. Opposite views were expressed for the solution contemplated in Figure

² See, for information, the European Commission's websites at [this link](#) and [this link](#), respectively.

17(b), *i.e.* that the Commission requires the participants to the new voluntary label to also participate in Ecolabel, EMAS and similar other initiatives. Finally, 39% of respondents agreed with the option considered in figure 17(c), in which the Commission includes only “references” to other criteria, without requiring members to also participate in the latter. Many professional associations and federations were against this option.

Figure 17 – The voluntary label and existing EU initiatives





1.1.2.2 Possible Criteria to be included in the future quality scheme

In the third part of the online survey, respondents were asked to evaluate the criteria underpinning the possible EU initiative on quality schemes on the basis of two elements: cost/burden and relevance. Table 2 reports the results of the responses received by all stakeholders, which show that most criteria are not considered very expensive to implement by the respondents. The figure shows that criteria n. 3, 4, 6, 7, 8, 10, and 11 are not considered costly or burdensome to implement, whereas criteria 1, 2, 5, 9 and 13-16 are associated with a “medium” burden, and criterion n. 12 with a high burden. Not surprisingly, the least costly criteria are often also the ones that are already being complied with. The perceived relevance of the different criteria is analysed below.

When asking for the cost/burden, the respondents also had the possibility to select the “already complying with it” answer. The latter is not reported in Table 2 since this answer is only relevant for enterprises and not for professional associations or public administrations. The responses provided by enterprises on this point are presented as the “business as usual factor” in table 3 below.

Table 2 – Costs, burdens and relevance of the proposed criteria

N.	Criterion	Cost/ Burden					Relevance			
		Very expensive / burdensome	Medium expense/ burden	Low expense / light burden	I don't know	Irrelevant criteria	High	Medium	Low	Don't Know
1	Undergo regular quality assessment	16%	43%	7%	5%	0%	73%	16%	0%	1%
2	Keep and follow up a documented action plan according to the outcome of the quality assessments	10%	41%	19%	6%	0%	57%	25%	5%	4%
3	Involve the employees in the quality process	14%	20%	31%	4%	1%	63%	25%	2%	2%
4	Identify a quality coordinator	3%	27%	34%	5%	1%	59%	26%	3%	3%
5	Carry out consumer surveys and systematically take them into account	9%	37%	27%	2%	0%	69%	16%	4%	1%
6	Establish a complaints handling mechanism	7%	15%	47%	3%	0%	70%	15%	3%	1%
7	If a website is available, allow consumers to submit complaints via the internet	1%	14%	52%	3%	1%	56%	24%	6%	4%
8	Respect and follow national/regional/local customs, heritage, traditions and identity	3%	14%	25%	12%	15%	44%	24%	16%	5%
9	Provide correct, reliable and clear information accessible to consumers about services in at least one relevant foreign language, if appropriate to location and business concept, besides those required by law	16%	29%	24%	4%	1%	57%	25%	7%	1%
10	If a website is available, apply the same rules to information provided over the Internet	1%	10%	53%	4%	1%	54%	27%	6%	4%
11	Provide information on available local services/products, for instance transport, activities, cultural and natural heritage, local food, as well as on possible sustainability aspects, accessibility, etc...	5%	14%	45%	5%	3%	45%	36%	5%	4%
12	Provide evidence of trained or experienced employees relevant to the business activities at all levels of the hierarchy	25%	20%	18%	6%	3%	37%	39%	12%	2%
13	Keep a training plan for the personnel It should include planning for further training course at least once a year for every work position	29%	35%	10%	3%	1%	40%	37%	11%	3%
14	Provide customer oriented services and processes including maintenance, safety and cleanliness	9%	41%	14%	5%	1%	56%	27%	5%	3%
15	Keep and follow a preventive maintenance plan identifying the elements and equipment to be periodically maintained	7%	33%	23%	6%	1%	39%	25%	22%	4%
16	Keep and follow a documented cleaning plan for the facilities and/or equipment.	8%	28%	24%	7%	3%	39%	24%	22%	4%

1.1.2.3 Responses by group of stakeholder

When discussing the costliness and relevance of the 16 criteria, it is important to analyse the responses given by groups of stakeholders. Tables 3 and 4 show the results of this analysis. It is important to note the following:

- Opinions sometimes diverge as regards the cost level. For instance, the costs associated to criteria n. 5 and 16 are considered “low” by enterprises and public administrations but “medium” by professional associations; criteria n. 3 is deemed very burdensome by professional associations/federations but “low” by the other two categories of respondents.
- Opinions also diverge on criteria n. 9 and 12, the cost of which is considered “low” by enterprises, “medium” by public administrations, and “high” by professional associations.
- Criteria 4, 6, 7, 8, 10 and 11 are associated with “low” costs or burdens by all three groups of stakeholders.
- Criteria 10-13 are considered highly relevant by enterprises and public administrations, but less by professional associations and federations;
- Some of these (i.e., 10 and 12) are also the criteria with the highest “business as usual” (BAU) factor among enterprises, which means enterprises “which are mostly belonging to the tourism sector” reportedly already comply with these criteria.

Overall, what emerges from the online consultation is that:

- Almost half of the criteria (n. 4, 6, 7, 8, 10, 11, and 16) are most likely to elicit a wide agreement among stakeholders;
- Criteria 1, 2, 3, 9, 12, 14 and 15 are seen with favour, but might meet the reluctance of some of the stakeholders;
- Criterion 13 is the most likely to elicit some disagreement, in particular among professional associations.

Table 3 – Cost/burden of the 16 proposed criteria: responses for three groups of stakeholders

Criteria			Type of respondent			
			Enterprises		Public admin	Professional Associations/Federation
			Cost/Burden	BAU	Cost/Burden	Cost/Burden
1	Undergo regular quality assessment	Very expensive/burdensome	7%	13%	21%	20%
		medium expense/burden	33%		36%	53%
		low expense/light burden	33%		8%	3%
		Other/I don't know	0%		8%	2%
2	Keep and follow up a documented action plan according to the outcome of the quality assessments	Very expensive/burdensome	20%	13%	11%	8%
		medium expense/burden	13%		30%	65%
		low expense/light burden	40%		25%	10%
		Other/I don't know	0%		8%	3%
3	Involve the employees in the quality process	Very expensive/burdensome	7%	33%	2%	28%
		medium expense/burden	7%		21%	25%
		low expense/light burden	40%		36%	25%
		Other/I don't know	0%		6%	3%
4	Identify a quality coordinator	Very expensive/burdensome	7%	27%	0%	3%
		medium expense/burden	13%		23%	33%
		low expense/light burden	40%		30%	43%
		Other/I don't know	0%		8%	3%
5	Carry out consumer surveys and systematically take them into account	Very expensive/burdensome	7%	33%	11%	8%
		medium expense/burden	13%		26%	52%
		low expense/light burden	33%		28%	27%
		Other/I don't know	0%		4%	0%
6	Establish a complaints handling mechanism	Very expensive/burdensome	7%	33%	2%	13%
		medium expense/burden	0%		21%	13%
		low expense/light burden	47%		36%	62%
		Other/I don't know	0%		6%	2%
7	If a website is available, allow consumers to submit complaints via the internet	Very expensive/burdensome	0%	33%	0%	3%
		medium expense/burden	13%		9%	20%
		low expense/light burden	33%		53%	60%
		Other/I don't know	7%		6%	0%
8	Respect and follow national/regional/local customs, heritage, traditions and identity	Very expensive/burdensome	0%	33%	0%	3%
		medium expense/burden	7%		17%	15%
		low expense/light burden	20%		28%	27%
		Other/I don't know	13%		17%	10%
9	Provide correct, reliable and clear information accessible to consumers about services in at least one relevant foreign language, if appropriate to	Very expensive/burdensome	7%	33%	6%	33%
		medium expense/burden	7%		34%	27%
		low expense/light burden	27%		26%	22%
		Other/I don't know	7%		4%	3%
10	If a website is available, apply the same rules to information provided over the Internet	Very expensive/burdensome	0%	40%	0%	3%
		medium expense/burden	7%		9%	10%
		low expense/light burden	40%		55%	65%
		Other/I don't know	0%		2%	5%
11	Provide information on available local services/products, for instance transport, activities, cultural and natural heritage, local food, as well as on possible	Very expensive/burdensome	7%	20%	4%	7%
		medium expense/burden	7%		17%	13%
		low expense/light burden	40%		43%	53%
		Other/I don't know	7%		4%	7%
12	Provide evidence of trained or experienced employees relevant to the business activities at all levels of the hierarchy	Very expensive/burdensome	13%	40%	17%	42%
		medium expense/burden	13%		26%	20%
		low expense/light burden	20%		19%	15%
		Other/I don't know	0%		6%	5%
13	Keep a training plan for the personnel It should include planning for further training course at least once a year for every work position	Very expensive/burdensome	13%	27%	23%	43%
		medium expense/burden	27%		40%	32%
		low expense/light burden	20%		11%	8%
		Other/I don't know	0%		4%	3%
14	Provide customer oriented services and processes including maintenance, safety and cleanliness	Very expensive/burdensome	0%	33%	8%	15%
		medium expense/burden	20%		42%	52%
		low expense/light burden	27%		15%	13%
		Other/I don't know	7%		8%	0%
15	Keep and follow a preventive maintenance plan identifying the elements and equipment to be periodically maintained	Very expensive/burdensome	0%	20%	8%	8%
		medium expense/burden	20%		34%	43%
		low expense/light burden	27%		23%	23%
		Other/I don't know	13%		9%	0%
16	Keep and follow a documented cleaning plan for the facilities and/or equipment	Very expensive/burdensome	7%	20%	6%	8%
		medium expense/burden	20%		21%	42%
		low expense/light burden	27%		30%	23%
		Other/I don't know	13%		11%	3%

Table 4 – Relevance of the 16 proposed criteria: responses for three groups of stakeholders

Criteria	Relevance	Type of Respondent		
		Enterprises	Public admin.	Professional Associations/ Federations
1 Undergo regular quality assessment;	High	53%	68%	82%
	Medium	33%	19%	12%
	Low	0%	0%	0%
	Don't Know	7%	0%	0%
2 Keep and follow up a documented action plan according to the outcome of the quality assessments;	High	40%	53%	67%
	Medium	40%	26%	22%
	Low	7%	8%	2%
	Don't Know	7%	2%	5%
3 Involve the employees in the quality process;	High	67%	64%	57%
	Medium	20%	23%	33%
	Low	0%	0%	5%
	Don't Know	7%	2%	2%
4 Identify a quality coordinator;	High	60%	47%	73%
	Medium	27%	34%	17%
	Low	0%	6%	2%
	Don't Know	7%	2%	3%
5 Carry out consumer surveys and systematically take them into account;	High	60%	60%	78%
	Medium	13%	25%	10%
	Low	13%	2%	5%
	Don't Know	7%	2%	0%
6 Establish a complaints handling mechanism;	High	60%	74%	78%
	Medium	20%	8%	13%
	Low	7%	4%	2%
	Don't Know	7%	2%	0%
7 If a website is available, allow consumers to submit complaints via the internet;	High	53%	51%	62%
	Medium	27%	28%	20%
	Low	7%	4%	8%
	Don't Know	7%	6%	3%
8 Respect and follow national/regional/local customs, heritage, traditions and identity;	High	60%	42%	38%
	Medium	13%	38%	18%
	Low	0%	4%	32%
	Don't Know	13%	4%	5%
9 Provide correct, reliable and clear information accessible to consumers about services in at least one relevant foreign language, if appropriate to	High	67%	62%	47%
	Medium	7%	23%	37%
	Low	13%	2%	10%
	Don't Know	7%	2%	0%
10 If a website is available, apply the same rules to information provided over the Internet;	High	67%	62%	42%
	Medium	20%	17%	43%
	Low	0%	4%	7%
	Don't Know	7%	6%	3%
11 Provide information on available local services/products, for instance transport, activities, cultural and natural heritage, local food, as well as on possible	High	33%	49%	33%
	Medium	27%	34%	52%
	Low	20%	2%	7%
	Don't Know	13%	2%	3%
12 Provide evidence of trained or experienced employees relevant to the business activities at all levels of the hierarchy;	High	53%	38%	27%
	Medium	20%	34%	57%
	Low	0%	13%	13%
	Don't Know	7%	2%	0%
13 Keep a training plan for the personnel It should include planning for further training course at least once a year for every work position;	High	47%	45%	33%
	Medium	20%	32%	50%
	Low	13%	8%	13%
	Don't Know	13%	2%	0%
14 Provide customer oriented services and processes including maintenance, safety and cleanliness;	High	67%	55%	55%
	Medium	7%	23%	38%
	Low	0%	8%	3%
	Don't Know	20%	4%	0%
15 Keep and follow a preventive maintenance plan identifying the elements and equipment to be periodically maintained;	High	47%	40%	37%
	Medium	27%	25%	25%
	Low	7%	19%	33%
	Don't Know	13%	6%	0%
16 Keep and follow a documented cleaning plan for the facilities and/or equipment.	High	47%	40%	38%
	Medium	20%	28%	22%
	Low	13%	17%	32%
	Don't Know	13%	4%	3%

In light of the analysis of impacts exercise aimed at identifying the preferable course of action for the operational implementation of the possible initiative, we first examine the perceived relevance of these 16 criteria as reported in the open public consultation. This

allows us to identify the “bulk” of criteria (1-6 and 9) that should be considered in any future proposed action, as well as a number of additional criteria that would be included in more ambitious and demanding versions. The “bulk” of criteria are those considered highly relevant by all categories of respondents. For the more demanding versions (see section 2 below), we have combined the results of the public consultation on relevance with broader considerations on possible synergies between the proposed criteria and other policy initiatives in the tourism sector. These are discussed in greater detail in the section comparing policy options and sub-options. Finally, considerations based on costs are included in Annex VI.

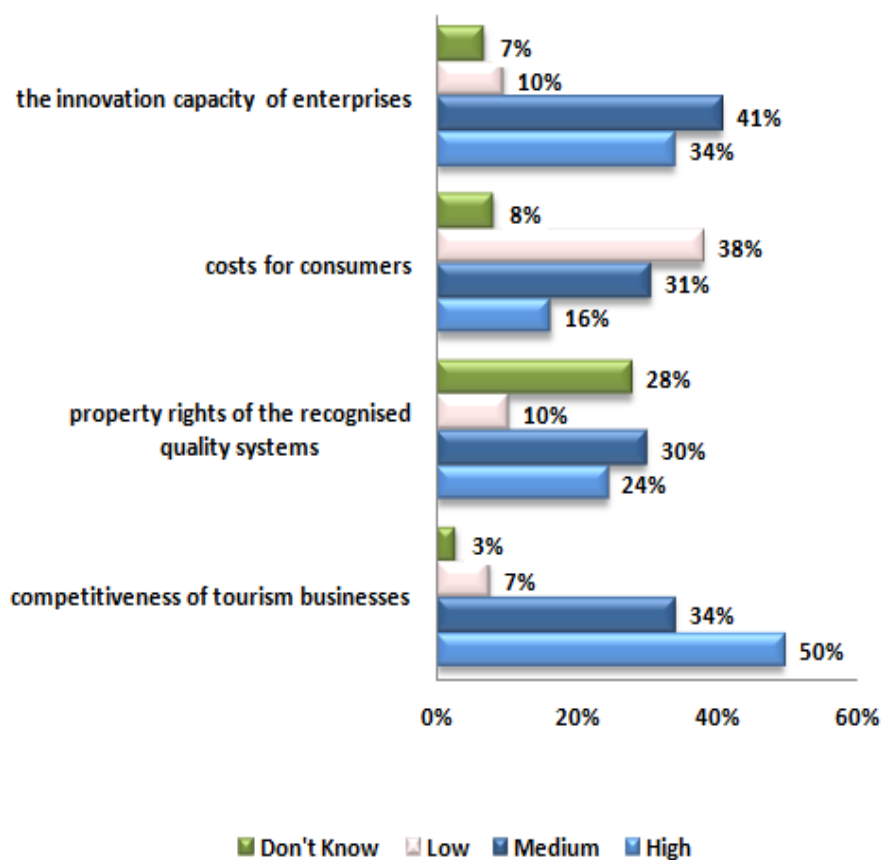
1.1.3 Prospective impact of the initiative

In the final section of the questionnaire, respondents were asked to evaluate the relevance of certain statements regarding the potential economic, environmental and social impacts of the initiative. Figures 17 through 19 show the results, which are broken down by economic, social and environmental impacts.

1.1.3.1 Economic impacts

Figure 17 below shows that respondents associate to the proposed initiative a positive impact on the competitiveness of the European tourism industry, mostly due to the improvement of service levels and quality in the European tourism sector in general. In short, combined with the responses to the statements on problem definition shown in Section 1.1 above, there is concern for the competitiveness of the European tourism sector and also an expectation that the possible EU action can potentially remedy this problem. However, it must be noted that some respondents stated that this initiative would have no added value for the tourism businesses, and accommodation in particular, because quality schemes are now replaced by various online tools, and thus rendered obsolete. In addition, the relative majority of respondents (38%) believe that the cost for consumers arising from a possible action would be low. Finally, it is important to recall that, among those respondents who agreed that fragmentation is a detriment to the competitiveness of the EU tourism sector, 67% thought that the expected impact on the competitiveness of tourism businesses would be high.

Figure 18 – Relevance of economic impacts

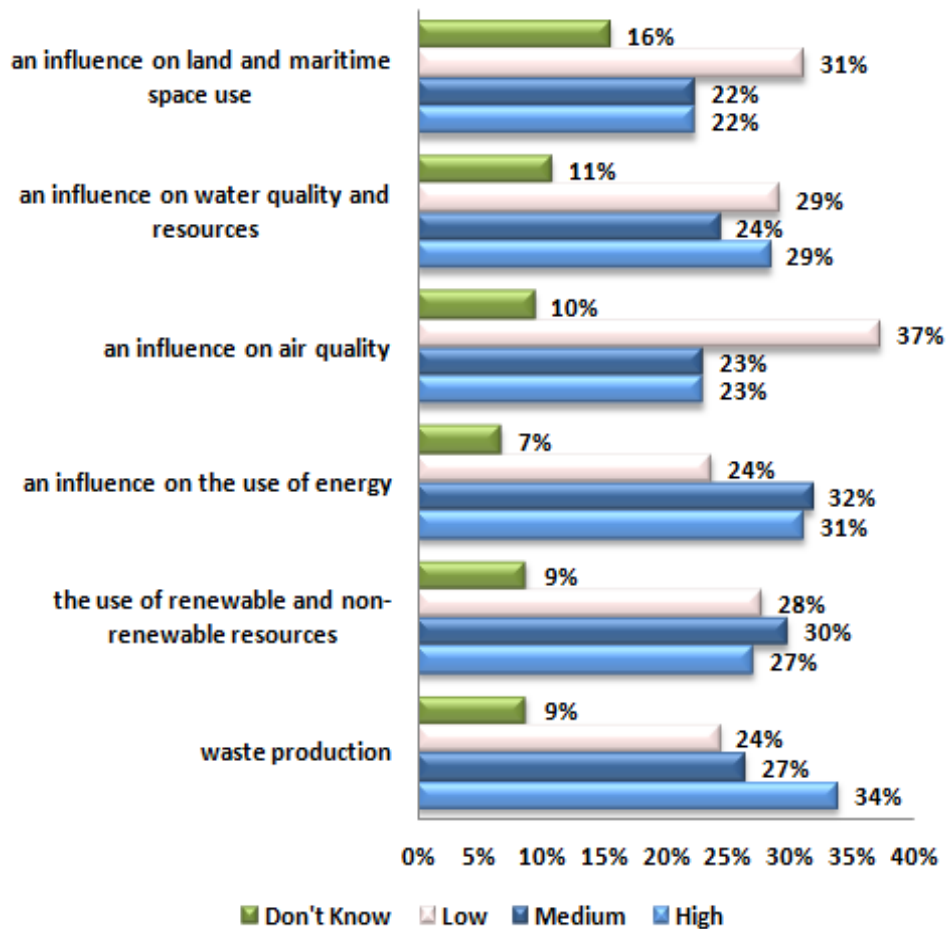


1.1.3.2 Environmental impacts

As regards the relevance of potential environmental impacts of the initiative (Figure 19 below), most respondents are sceptical on the potential impact of the initiative on the use of land maritime space and on air quality. Respondents associated the initiative with a greater impact on the use of energy, renewable and non-renewable resources and waste production.

We have also calculated the potential impacts expected by those that expressed agreement on the possible inclusion of sustainability criteria in the future label (see Section 1.1.2.1 above). Interestingly, for all potential impacts considered this group of respondents selected the “high” option most frequently than any alternative. This is true in particular for waste production (50% of responses); use of energy (45%); water quality and the use of renewable and non-renewable resources (both 40% of the responses); air quality (34%) and land use and maritime resources (33%).

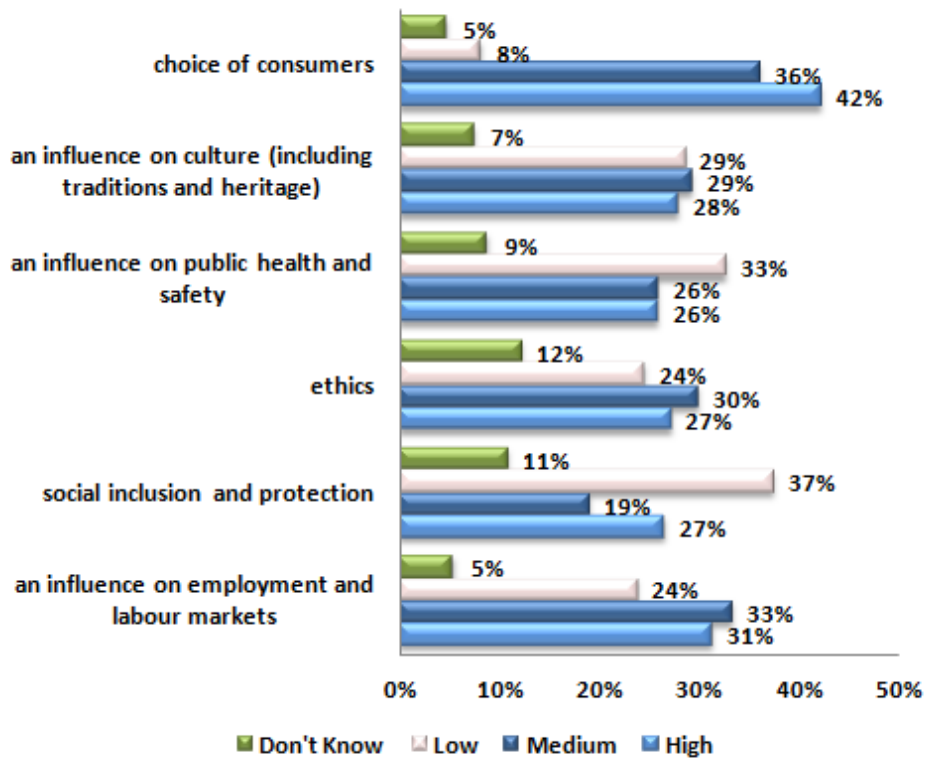
Figure 19 – Relevance of environmental impacts



1.1.3.3 Social impacts, innovation and consumer choice

Finally, Figure 20 shows the expected magnitude of the social impacts of the proposed initiative. Results show that the respondents attributed great relevance to the impact of this initiative on consumer choice. On the other hand, the impact on social inclusion and protection as well as on public health and safety, were considered low by most respondents. Impacts on ethics, employment, and culture were mostly rated “medium”. Some of the respondents stated that, up to now there is no study that enables an accurate evaluation of the impacts of the possible initiative. The current analysis of impacts may potentially fill this gap.

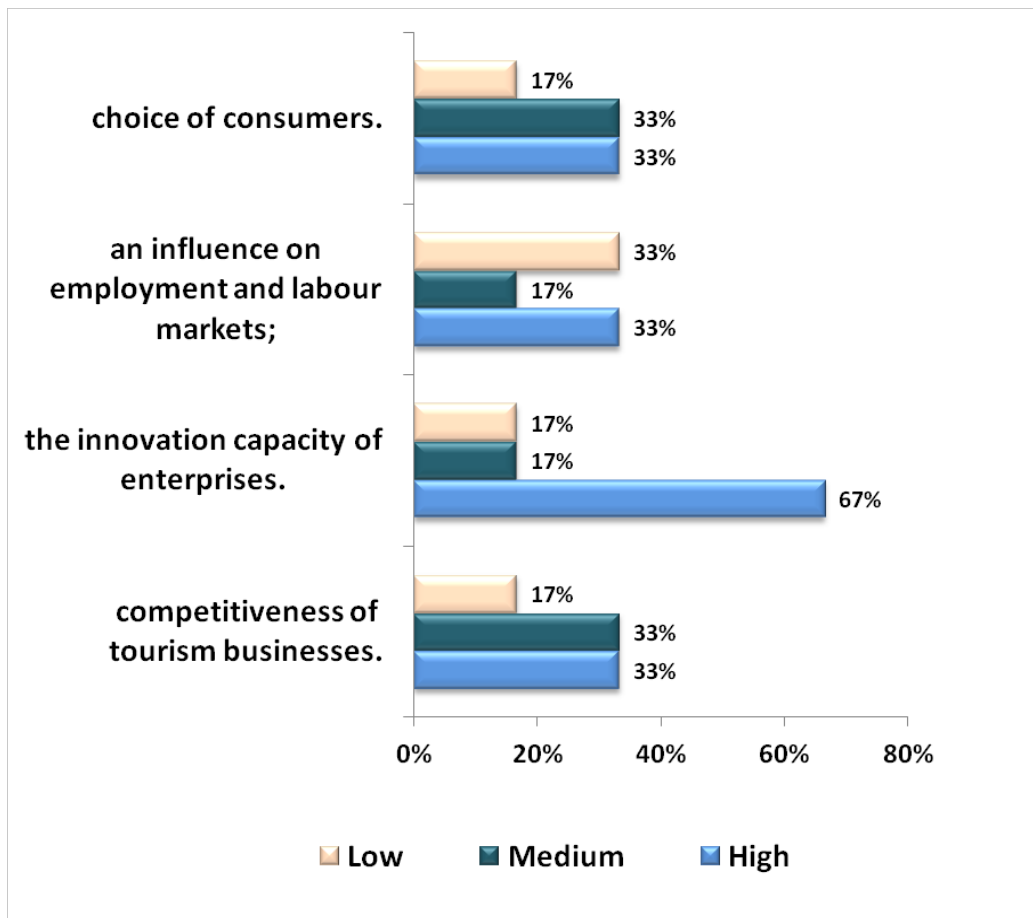
Figure 20 – Relevance of social impacts



1.1.3.4 Views of the enterprises

Figure 21 shows the answers given by businesses when responding to some of the questions related to the expected impacts of the proposed initiative. As shown in the graph, the potential impact on the innovation capacity of enterprises was considered to be high by 67% of enterprises, a completely different value compared to the average for all respondents (35%). Also, the relative majority of respondents think the impact on consumer choice and competitiveness of the tourism sector would be high.

Figure 21 – Views of the enterprises



1.1.4 Overview of Comments

This section aims to present an overview of the comments provided by the respondents either by answering open-ended questions in the survey or by sending separate position papers. Overall, it is safe to state that a large majority of the stakeholders support the initiative. Comments are expressed in order to iron out some of the foreseeable obstacles from the perspectives of the respondents operating at different levels of governance and in various parts of the Tourism industry. Very few responses were outright opposing the initiative.

The most recurring opinions were that any initiative *should be free, simple and voluntary*. This initiative should be market driven and not bring any more burdens on the businesses and confusion to the consumers. Therefore, the effective communication of this initiative to all stakeholders is seen a crucial step of the process. A federation of associations across Europe stressed the importance of a long term strategy in order to build up consumer perceptions and create awareness. A consumer association voiced its support for the possible EU action and stressed the importance of including all consumers across the EU (e.g. by removing language barriers). The respondent added that social media and online tools should be considered within the context of such a strategy. A public authority, among others, drew attention to the increasing number of online tools that are becoming increasingly influential on consumers' choices. However, these tools are growing without control and any initiative should thus consider the situation. Other respondents advocating that the possible initiative should be market-driven shared this comment.

Moreover, many stakeholders argued that *the diversity of European destinations must be respected and preserved*. Therefore, a number of respondents, all operating in the area of tourism and working with quality evaluation schemes, were sceptical over the impact of the a possible EU action on the promotion to third countries. It was noted that a small fraction of tourists choose Europe as a destination and a larger fraction chooses specific destinations or products within Europe. Also, there seems to be consensus among the respondents in support of management of this initiative at the EU level. Nothing new should be invented in terms of governance and any EU initiative should rely on the existing bodies at the regional and local levels. In order to avoid overlaps, the EU action could be first run as a pilot programme in a limited geographical scope. Respondents stressed the need for independent governance.

Opinions were more diverging over the potential value added of this initiative. Some respondents see its value added in terms of overall competitiveness through promotion and marketing whereas others attribute it to consumer protection. A widely shared idea among stakeholders was the value added in improving the overall quality in the European tourism sector. Opinions were more diverse over the type of criteria that should be included in a possible EU initiative. A considerable number of respondents explained that the criteria should be more general and based only on quality features, whereas others supported more detailed criteria specific to various sectors of Tourism. While some respondents supported detailed and stringent criteria such as personnel training and specific hygiene plans, the majority supported the idea of having general criteria that are easy to implement for the various stakeholders in the Tourism sector. These criteria should focus more on results than process. Accordingly, the criteria should focus more on quality requirements.

Additional comments include:

- A medium-sized enterprise active in the tourism sector that joined a quality evaluation scheme for the purpose of gaining more visibility, mentioned that it fully supports this initiative as long as it is not complex and burdensome.
- Other respondents also mentioned that any possible initiative should not bring any additional burden on businesses, particularly from a human resources perspective.
- The important role of micro-firms in the European tourism sector was highlighted.
- A national public administration responsible for tourism voiced concerns over the ambiguity of costs that will be incurred by businesses.
- It was pointed out that the European Commission will have to clarify how differences in the capacity of micro and large enterprises will be accommodated by the any EU initiative in order not to harm smaller companies.
- One association suggested that audits should be free of charge and that audit personnel of local labels could be utilized for the any EU initiative.
- Conversely, a public authority suggested that any EU initiative should not be foresee its own audits but only coordinating quality schemes across the EU to raise the overall service quality.
- It was also stressed that the value added of this initiative should be made clear and it should be designed in a “SME language” while avoiding any complexity.
- The importance of the value added of the possible initiative was iterated by an association in the area of tourism. Accordingly, criteria should be limited (chosen

among the ones that are already being complied with by the majority) and “Destination Management” should be embraced by the initiative.

- The potential value added of this initiative was defined by a local public administration as the coherent and visible quality scheme it provides along with clarification benefits for consumers
- An association in the area of tourism that operates a quality evaluation scheme mentioned that the consumers have little faith in labels. In the same vein, another respondent stressed the difficulty of making this initiative visible to the consumers.
- A regional public authority recognized the potential of the initiative to tackle the problem of fragmentation in the market but stressed that it should not exclude local labels and tackling fragmentation should not lead to loss of local identities and diversity.
- The preservation of local identities and diversity as well as the importance of flexibility of the possible EU action are among to most recurrent themes throughout the comments. Notwithstanding, one opinion stressed the need for a harmonized scheme that provides the consumers with a credible, clear and comparable classification system.
- Another association suggested CEN standards for harmonization so that the EU initiative would be recognized by all businesses and consumers as a trademark.
- One micro enterprise expressed concerns over the extent to which marginal fractions of the tourism sector would be able to integrate with the possible EU initiative, since not all criteria that are essential for larger parts of the sector (e.g. accommodation) are as rigorously enforced and applied by others. On the other hand, an association mentioned that an EU initiative with a broad coverage risks overshadowing existing schemes with a special focus (e.g. on environment) and would hinder the development of other focused schemes (e.g. on accessibility and corporate social responsibility).
- One association suggested that any EU action be implemented in the form of a convention aiming at complementing, recognizing and improving existing schemes as well as encouraging new ones.
- As a part of the discussion on the coverage of the possible initiative, a national public authority underlined that the currently excluded “star” system should fall within the scope of this initiative. It was also mentioned, by other stakeholders, that the biggest beneficiaries of this initiative would be accommodation businesses.
- One public administration operating a voluntary quality evaluation scheme for the tourism sector underlined that the possible initiative should be managed at the EU level and in addition, asked for more details to be revealed on the working mechanisms of the initiative.
- One association in the field of tourism, operating a quality evaluation scheme, stated that the possible EU action should be based on existing successful schemes.
- Some comments also mentioned that the possible EU initiative should be used to increase communication in the tourism sector in several areas and to impose cross-border cooperation to strengthen the single market in this area. It should also facilitate the exchange of best practices among quality evaluation schemes across Europe.
- Professional associations and/or federations converged around the idea that the participation to the possible EU initiative should be free and voluntary. Furthermore, incentive mechanisms need to be discussed. One respondent also mentioned that the

governance should be democratic and inclusive of all stakeholders. This is also seen as a way to ensure the effective implementation of the initiative in order to improve overall quality levels and have a potential return for businesses.

- Diverging opinions were expressed by a public authority in Spain. The respondent deemed the initial criteria of the possible EU initiative insufficient and providing no value added for the consumers. It also suggested that in order to accommodate the wide variety of existing schemes across Europe, any EU action should have various levels both in terms of geographical scope (i.e. national, regional and transnational) and performance (i.e. gold, bronze labels).
- An association operating a quality evaluation scheme with 4000 members voiced a rather negative opinion. Due to the number of different sectors involved, the possible EU action would have to be too general to cover the wide variety of businesses in the tourism sector, and this would limit its significance. Furthermore, such an overarching umbrella would not bring clarity. For this respondent, the possible initiative does not meet any need in the market and thus, ultimately, has no value added. In addition, one public authority from Germany stated that the possible initiative provides no positive economic gains and threatens the diversity of destinations across Europe. An Irish public authority claimed that it fails to see the value of this initiative and believes that it will create practical difficulties in implementation. The main concern is confusion among stakeholders and consumers in particular and its potential costs for businesses. Finally, as mentioned above by other respondents, the possible initiative seems to miss the fact that online tools are expanding in popularity and function, although they are clearly not a replacement for regulated quality evaluation schemes.

Annex:

List of respondents