

Response by ENAT to the European Commission Communication:

COM(2010) 352 final

“Europe, the world's No 1 tourist destination – a new political framework for tourism in Europe” (30.6.2010)

About ENAT

The *European Network for Accessible Tourism (ENAT)* is a non-profit association registered in Brussels since May 2008. The association originated from a pilot project co-funded by the European Commission (from 2006 to 2007) with the aim of “mainstreaming disability policies” in the tourism sector.

ENAT represents about 300 member organisations and individuals in more than 25 countries in 5 continents. It includes tourism enterprises, national and regional tourist boards, municipalities and other public authorities, NGOs of disabled people and other consumer/interest groups, universities and colleges, access consultants and individuals, all with an interest in developing accessible tourism for all visitors.

ENAT members include these international organisations:

- The United Nations World Tourism Organisation,
- The Design for All Foundation,
- The Global Alliance on Accessible Environments and Technologies (GAATES), and
- The International Organisation of Social Tourism (formerly BITS).

The mission of ENAT is to make European tourism destinations, products and services accessible to all travellers and to promote accessible tourism around the world.

ENAT aims to achieve this by various mechanisms and actions:

- ENAT brings together sector actors to share their experience, learn from each other and collaborate;
- ENAT conducts awareness-raising activities about the need for accessibility in all areas of travel and tourism to public bodies, operators and stakeholders;
- ENAT manages the *ENAT Code of Good Conduct* – a commitment label and certification scheme for tourism businesses and organisations, recognising their efforts to promote accessible travel and tourism. It is the first and only international labelling scheme for the promotion of ethical business standards in Accessible Tourism for All.
- ENAT supports the development and spread of good policies and practices by conducting studies, participating in projects and publishing its findings.
- ENAT works to develop knowledge and expertise on accessibility issues in the European tourism field.
- ENAT provides a platform for those who support accessibility in tourism, and a representative voice towards European and national institutions and organisations whose actions have a direct influence on the tourism sector.

Comments on the Communication

ENAT welcomes the Commission's Communication which aims to define a renewed policy framework for tourism in Europe.

The Communication is a wide-ranging document touching on numerous challenges and opportunities which require a strategic response and support at the European level.

While we agree broadly with the aims and intended actions of the document we believe that policies and actions relating to *tourism accessibility* are insufficiently represented.

ENAT proposes 3 additional policy targets and actions to address *Accessible Tourism* within the EU tourism strategy, as outlined below:

Accessible Tourism

Target 1. Implementation of measures to ensure equal rights for persons with disabilities in the tourism sector

Before the publication of the EU tourism Communication, the Europe Union and all 27 Member States had signed the *UN Convention on the Rights of Persons with Disabilities*.¹ On 23 December 2010 the European Union ratified the Convention.² It is the first comprehensive human rights treaty to be ratified by the EU as a whole. It has also been ratified by 16 EU Member States.

The convention's *Article 30* requires States Parties to ensure equal access for persons with disabilities to leisure, sport and tourism.

This will be achieved through adjustments to existing legislation, new legislation, and the development of standards and guidelines which should lead to improvement of offers in the tourism sector. Progress on implementation of the Convention must be reported to the UN and is being monitored by an expert committee. Legal proceedings can already be taken by disabled people or their organisations in some EU countries against suppliers, including tourism operators, who may have contravened disability discrimination laws.

Accessible tourism is not only a legal requirement. It also represents a significant potential market for the tourism sector. Good accessibility benefits not only disabled people but also seniors, families with small children, pregnant women, and people carrying large items of luggage and others who need good access.

In order to support suppliers in meeting their legal obligations, as well as improving their profitability, ENAT seeks to influence governments as well as public and private actors in the tourism sector and related sectors (e.g. transport, ICTs, construction, environment, education...). ENAT believes that all tourism operators should incorporate *accessibility considerations* generally in their businesses.

In light of the new international commitments, the EU tourism strategy should include measures to enable tourism enterprises, (venues, destinations, accommodation providers etc.) to respond to the possible challenges.

¹ UN Convention: <http://www.un.org/disabilities>

² See: *EU Ratifies UN Convention on Disability Rights*:
<http://www.accessibletourism.org/?i=enat.en.news.1081>

In relation to Target 1, ENAT proposes four actions addressing rights of disabled tourists, to be coordinated at European level, in cooperation with Member States, actors and stakeholders:

- Awareness–raising campaigns and events (targeting private tourism enterprises and public bodies that support tourism) about disability rights and how to address these through the adoption of accessible tourism best practices;
- Supporting the participation of representative tourist bodies in networks of national and EU legislators to improve and adapt legislation in the area of disability rights and tourism;
- Supporting the monitoring of equal access to tourism for persons with disabilities, in cooperation with EU institutions, Member States, NGOs of people with disabilities and tourist organisations;
- Support for staff training in the tourism sector addressing disabled tourists' rights and 'meeting and greeting' visitors with disabilities.

Accessible Tourism

Target 2. Stimulate the development of the accessible tourism market in Europe

In addition to specific actions related to disabled people's rights and how to address these (Target 1, above), ENAT believes that the EU tourism strategy should include further actions for implementing accessible tourism across the whole tourism sector and in all EU member States. This would enhance the visibility of accessible tourism and improve tourism quality for other important target groups, including older citizens, families and others who need good access.

We wish to emphasise that *accessibility of tourism venues and services* is not only a legal requirement in a number of EU countries but it is also a significant potential market for the tourism sector. Good accessibility benefits not only disabled people but also seniors, families with small children, pregnant women, people carrying large items of luggage and others who need good access. This market has long been under-served by tourism operators in Europe but this pattern is changing.

Figures from the UK Tourism Survey 2009 show that 11% of overnight stays in the period January to June were made by people who either have or are accompanied by someone with a health condition or impairment by persons with a disability or long-term health problem. These visitors contributed almost 2 billion Pounds Sterling to the English domestic visitor economy in 2009.

Crucially, at a time when tourism operators are experiencing severe financial hardship, the implementation of accessibility measures can be an effective way to attract new customers, diversify tourism offers and capture a share of the growing accessible tourism market. Investments in accessible infrastructure and services can strengthen businesses and safeguard revenue streams, and thus help to maintain Europe's leading position in the global tourism market.

A study conducted by ENAT members in 2005 has estimated the market of visitors who need accessible tourism at 27% of the European population, with a market value of at least 83 billion Euro per year.³

The EU strategy must raise awareness among tourism providers about accessibility and advise them how to improve their knowledge and skills in this area, so as to take advantage of this important market.

Europe's present lead in terms of incoming tourism numbers cannot be maintained without a broad, strategic response to the changing demographics of the major global tourism markets. While the Communication mentions demographic ageing in Europe, similar trends are taking place in the industrialised and industrialising countries around the world. If Europe as a whole fails to offer adequate standards of quality, accessibility, security, safety, convenience and comfort to older visitors, it is likely that these consumers would favour other world regions, leading to fewer tourists and lower tourism revenues in the European Union.

ENAT proposes *three actions dedicated to building Europe's accessible tourism capacity and expertise* under Target 2:

- EU support should be provided for a knowledge-sharing network of tourism actors and stakeholders addressing accessible tourism marketing, research & development, advisory and monitoring services and eLearning. (ENAT already provides a network with some of these functions, which is maintained by membership contributions. With a targeted funding programme the network could provide a wider range of services to tourism businesses. It could also be tasked with providing analysis, monitoring, dissemination and advisory functions for the EU institutions and Member States).
- Targeted support funding for research, development and innovation in the area of accessible tourism;

³ See OSSATE (2005) *Accessibility Market and Stakeholder Analysis*, University of Surrey. Download PDF from this page: http://www.ossate.org/efa_showcase/reports.htm

- Support for actions to prepare guidelines and voluntary standards for accessible tourism services, following ENAT's proposals to CEN (2008, 2010).⁴ ENAT believes that the EU should support the development of guidelines for accessible tourism by experts in collaboration with stakeholders, so as to deliver clear advice to businesses who are seeking to enter this market. After using the resulting guidelines for a period, the tourism industry may then decide whether it is appropriate to develop voluntary access standards. While some parts of the tourism industry presently reject the idea of developing accessible tourism standards, many tourism businesses, cities, regions and destinations across Europe are eager to adopt voluntary access standards that can help them guarantee the quality of their products and services, strengthen their 'accessible' brand image and provide reassurance to potential customers.

Accessible Tourism

Target 3. Implement best practices and apply accessible tourism expertise generally in the EU tourism strategy and its proposed actions

ENAT would like to see *Tourism Accessibility* as a “horizontal” theme within the EU Tourism Strategy in general. In the EC Communication, accessible tourism measures could be included in various proposed actions but such measures were not specified.

While it may not be possible to implement accessibility measures across the whole range of EU tourism actions within the short-term, we have identified several specific actions in the Communication that we believe would benefit from incorporating the principles and practices of accessible tourism.

ENAT proposes that the following actions, put forward in the Communication, should *address and incorporate accessible tourism principles and practices*. This would be achieved by drawing on existing expertise, sharing best practice experiences in the EU Member States and by involving relevant actors and stakeholder organisations in their design and implementation:

⁴ See: *ENAT Proposes CEN Workshop Agreement on Accessible Tourism and Transport Services* <http://www.accessibletourism.org/?i=enat.en.news.522>

See also: *CEN Seminar on Standardization in the Tourism Sector*, December 2010. <http://www.accessibletourism.org/?i=enat.en.events.1075>

(Priority 1) Stimulate competitiveness in the European tourism sector

a. Actions promoting diversification

- Include requirements and measures for accessible tourism in the actions to diversify the promotion of tourism services
- Include accessibility as a parameter of Heritage and Cultural tourism
- Include accessibility criteria as part of tourism labelling schemes.

b. Actions developing innovation

- Include accessibility experts from the ICT and Tourism sectors in the development of the *ICT & Tourism stakeholders' platform*

c. Actions improving professional skills

- Include accessible tourism training as well as Health and Well-being in new training programmes co-financed by Leonardo, CIP and other programmes

d. Actions encouraging an extension of the tourist season

- Ensure that the *CALYPSO* pilot programme and its related actions include tourism accessibility requirements as a horizontal issue to be addressed by providers for all specified target groups, and not only for persons with reduced mobility

e. Actions consolidating the socioeconomic knowledge base for tourism

- In the annual '*Consumer Markets Scoreboard*' establish the collection of data on tourists with disabilities and long-term health conditions in order to determine the size of this market in Europe and their satisfaction with tourism products and services
- Include accessible tourism experts in the *pilot network of socio-economic researchers*
- Include accessible tourism experts in the '*Virtual Tourism Observatory*'.

(Priority 2) Promote the development of sustainable, responsible and high-quality tourism

- Within the framework of NECSTouR or EDEN, ensure that indicators for the sustainable management of destinations include appropriate criteria and thresholds for tourism accessibility.
- Ensure that the proposed European '*Qualité Tourisme*' brand includes adequate consideration of parameters for tourism accessibility
- Ensure that the proposed *Charter for Sustainable and Responsible Tourism* includes adequate consideration of parameters for accessible tourism accessibility
- Ensure that proposals for *sustainable coastal and marine tourism* include access to the coast and sea for bathing, water sports and cruise tourism by persons with disabilities and others who require good access
- Include accessible tourism experts in *cooperation actions* between the European Union, the main emerging countries and Mediterranean countries.

(Priority 3) Consolidate the image and profile of Europe as a collection of sustainable and high quality destinations

- Include accessible tourism as part of the "*Europe brand*" in order to promote and distinguish European destinations
- Provide EU funding in order to include accessible tourism information from the whole of Europe in the *visiteurope.com* portal
- Include the showcasing of European accessible tourism at international events, fairs and exhibitions.

(Priority 4) Maximise the potential of EU financial policies and instruments for developing tourism

- Include accessible tourism considerations in the Commission's continued promotion and mobilisation of Community support instruments and programmes in favour of tourism.
- Promote the rights of passengers with disabilities when travelling by sea, bus or coach by means of EU legislation where necessary.

In conclusion, ENAT recognises that the development and implementation of the EU tourism strategy relies not only on the initiative of European institutions and national governments but also on the contribution of a wide variety of actors and stakeholders with different backgrounds and sometimes competing interests.

The proposals offered here are intended as an encouragement for the Commission to build on the improvements made in this field throughout the previous 20 years of experience in accessible tourism policy development in Europe.⁵ ENAT believes that the EU tourism strategy should re-vitalize accessible tourism, for the good of the tourism industry and its customers.

As a European based non-profit, multi-stakeholder network, ENAT offers the experience of its members and networking capabilities to the Commission and to other partners, with the aim of establishing Europe as the leading accessible tourism destination in the coming years.

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⁵ For a detailed discussion of EU policies in the area of accessible tourism from 1990 to 2007, see: *ENAT Study Report No. 3. Towards 2010: Disability Policy Challenges and Actions for the European Tourism Sector* (published 2008).
<http://www.accessibletourism.org/?i=enat.en.reports.512>