

**Réseau
des Chambres de Commerce
et d'Industrie
Insulaires
de l'Union européenne**



**Network
of the Island
Chambers of Commerce
and Industry
of the European Union**

**Contribution to the EC "Discussion document:
A new framework for the tourism policy in the EU"**

President of INSULEUR
Juan Gual de Torrella Guasp
Telf. : +34.971.710.188
Fax: +34.971.726.302
presidenciamallorca@camaras.org

Contact in Brussels
Carine Piaguet
Tél. : +32.2.221.04.34
Fax : +32.2.217.69.87
c.piaguet@acfc.cci.fr

INSULEUR- Network of the Island
Chambers of commerce and Industry of
the European Union
Michael Livanous 52
82100 Chios - Greece

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INSULEUR, the Network of the Insular Chambers of Commerce and Industry of the European Union, thanks the European Commission for the chance to participate in the consultation process for consolidating the new European tourism policy model.

As its main goals, the reference document proposes to stimulate the tourism industry's competitiveness, strengthen the development of sustainable tourism in Europe and promote Europe in the main third country markets. The actions that would take place within the new tourism policy aim to achieve these three objectives.

With respect to the first objective, it seems indisputable that the constant search for the European tourism sector's competitiveness should be one of our industry's aims. In an increasingly globalised tourism market and with the constant appearance of new cutting-edge destinations, one of the challenges facing our industry is to maintain competitiveness on a global scale.

As for the second objective, INSULEUR is especially aware of the development of sustainable tourism, given its members' insular nature and thus, the limitations of their natural resources. We believe that the firm prioritisation of the development of a sustainable tourism model that allows the different European regions to balance the economic growth derived from tourism with the maintenance of certain parameters of sustainability is a completely sound decision.

Lastly, it seems to us that the third objective - promoting Europe in the main third country markets - does not entirely cover the promotional needs of Europe as a whole. Point I in the document (General Context) states that "it will be important to strengthen the attractiveness of the European destinations for EU tourists, who account for 85-90% of the international tourists in the EU." Thus, it seems clear that the Commission should promote Europe not only in third countries, but also in Member States. The regions that make up INSULEUR receive a tourism that is overwhelmingly European and a large part of its competitors lie outside the EU. Therefore, it seems reasonable that intra-EU tourism values should be promoted within its own Member States. One might consider this to be an attribution of the Member States and regions, yet they also promote themselves in non-Member States and this does not prevent the Commission's contributions to this end. Furthermore, the Commission would be able to complement Member States' and regions' promotion with a general promotion.

Regarding INSULEUR's opinion of the actions proposed in the document, the possibilities for implementation and our proposals for other actions that may be developed, our view for each objective set out is as follows:

- **Stimulate the competitiveness of the tourism sector in Europe**

We consider the actions proposed in the document to be absolutely on target. As regards harnessing the potential of tourist exchanges, we propose extending the scope of the CALYPSO social tourism programme. In this respect, the DG ENTR is already familiar with the Spanish IMSERSO senior tourism experience and others that exist; we believe that steps should be taken to showcase a European exchange programme that is economically sustainable and effective.

Taking into account the essential nature of the human factor in tourism and the sector's exposure to factors such as seasonality, turnover, etc., we propose promoting the conditions needed for the on-going training of sector members, especially SMEs, as fundamental to stimulating the competitiveness of the tourism sector.

INSULEUR must draw attention to the differential feature that insularity provides its members. Thus, we propose fostering island destinations' maritime and air connections as an essential measure for maintaining their competitiveness as tourist destinations.

At the same time, a basic factor in the competitiveness of Europe's tourism destinations is re-converting their public and private infrastructures to adapt to new market demands. In this respect, we propose facilitating projects for the integral reform of tourist zones and establishing systems to monitor and disseminate successful cases at the European level.

With respect to enhancing the knowledge of the tourism sector, the Chambers of commerce can also contribute to the data consolidation in the tourism sector.

Concerning the promotion of the various financial instruments existing at EU level among the various actors of tourism, we would like to underline that access to EU fundings for very small businesses like those of the tourism industry is not easy for administrative and linguistic reasons. This action of promotion can be done through existing networks like CCIs, especially when regional funds are delivered, as in such cases CCI are often in charge of engineering the business' demand for funding.

- **Develop sustainable tourism in Europe**

The proposed actions are absolutely appropriate and necessary therefore we fully support the actions proposed.

Some of INSULEUR members are involved in CAST programme and have chosen to focus their first action on the promotion of environmental practices towards tourism SMEs. To do so, they have developed a handbook for tourism advisors of any intermediary organisation and a leaflet for SME with 10 eco-tips to be easily implemented.

- **Promote “Destination Europe” in the main third countries**

As mentioned, we propose extending the promotion of “Destination Europe” to the Member States themselves. Thus, we propose launching a specific campaign in Member States that foster European values as safe, diverse, close, quality tourism destinations.

To conclude: in line with the 2007 Agenda for a sustainable and competitive European tourism, we would like to underline the importance of intermediary organisations to reach the EU tourism policy’s objectives and to implement the proposed actions.

Businesses that play an important role in supplying tourist services are mainly very small or family-run businesses that need support from intermediary organisations such as CCI. To develop a tourism industry that is more competitive, more sustainable and more attractive to third countries, the expertise and know-how of intermediary organisations is critical to involve the very small tourism businesses.

CCI are intermediary organisations with a high added value on tourism issues, and particularly those who are situated in insular regions, like INSULEUR members.