



International  
Association of  
Amusement Parks  
and Attractions

**Europe**

Square de Meeus 38-40  
B-1000 Brussels  
Belgium

## ***Europe, the world's no. 1 tourist destination - a new political framework for tourism in Europe - draft implementation plan***

### **Comments by IAAPA Europe**

The inclusion of new EU tourism powers in the Lisbon Treaty gives Europe's tourism sector long overdue recognition as a serious economic sector in the wider European project. The days when tourism was regarded by most in the institutions as a largely *member-state* concern are, we hope, behind us.

IAAPA Europe, the European chapter of the International Association of Amusement Parks and Attractions, welcomes this development. Tourism offers the European economy some of its best prospects for growth and success as it searches for a way out of the current downturn.

We look forward to working with the EU institutions in ensuring that tourism businesses and their customers reap the full benefits of the new treaty status.

### **Implementing the new tourism policy framework - COM (2010) 352**

We endorse the overall aim of the Commission's new tourism policy to 'stimulate competitiveness in the European tourism sector'.

However, this aim will be achieved only if a European operating environment is created which allows tourism businesses to be dynamic and sustainable. The industry needs the EU institutions to have a better understanding of business concerns in the development of all EU policies affecting tourism.

*Achieving this understanding and a supportive, business-friendly climate must be at the centre of the EU's tourism policy activities. Without these 'must-have' priorities and a true spirit of partnership between the Commission (especially the Tourism Unit) and the industry, the other 'nice-to-have' ideas will be limited in what they can achieve.*

### **Proactive monitoring of EU policies having an impact on tourism**

*This is, for IAAPA Europe, the single most important proposal in the implementation plan. It does, however, need to be about more than just monitoring. The Tourism Unit in DG Enterprise has an important role in working with, and advising, its colleagues in other Commission services, as well as in keeping its eye on new proposals as they emerge and ensuring that the relevant industry players are aware of them.*

One way of achieving this would be to *improve dialogue with the industry*. Vice-President Tajani's agreement to the creation of a regular round table with industry (and other) representatives is a welcome step in the right direction. We hope that the first planned meeting, on standardisation policy, happens sooner rather than later.

We are not persuaded of the value of large conferences or centrally produced guides to EU funding. The biggest pot of European funding is, in any case, the regional funds where programmes and criteria vary from one area to another, reflecting local priorities. It will be a huge task to collate this information and maintain its accuracy centrally.

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*Instead, we urge the Commission to make better use of existing industry and destination networks, such as our own, in their efforts to keep businesses informed of new programmes, initiatives, funding, and legislative developments. These are ready-made channels which work well. There is no need to create new networks.*

We also believe that officials' knowledge and understanding of the industry would gain considerably from increased first-hand experience of the different sectors, the practical issues they are confronted with and the visitor experiences that they offer. It is, after all, tourism businesses who are the people working directly with customers, responding to market needs and providing the services that they want.

So, as we suggested in our response to the policy consultation held early in 2010, one way of achieving this would be to develop a programme of familiarisation visits for Commission staff. *IAAPA Europe would be delighted to devise such a programme for the visitor attractions sector.*

### **Current issues of concern to IAAPA Europe members**

These include:

- Attractions safety - always our top priority
- Attractions' eligibility for reduced-rate VAT
- Fair competition between public- and private-sector attractions
- Distance-selling provisions of the proposed consumer rights directive
- Standardisation policy

We would be happy to brief Commission officials further on these and other issues that we are following.

### **Promoting diversification of the supply of tourist services**

The implementation plan devotes significant space to this idea, talking at length about common heritage, cultural itineraries and much more. We caution against emphasis on such supply issues in this implementation plan. *We believe strongly that the emphasis should be on market-driven initiatives and marketing support that can complement the industry's own product development projects.*

### **Developing innovation in the tourism industry**

The plan includes a proposal for an ICT and tourism platform for tourism 'stakeholders', but is not at all clear as to what precisely is envisaged. Discussions at the European Tourism Forum spoke of tailoring ICT to the needs of tourism SMEs.

IAAPA Europe has no particular objection to the idea. Indeed, we would welcome a project that is genuinely helpful to businesses in giving them insights into this complex, rapidly changing and very important topic.

*Founded in 1918, IAAPA is the largest international trade association for permanently situated amusement facilities worldwide. The organisation represents more than 4,500 facility, supplier, and individual members from more than 90 countries. IAAPA has 600 members in Europe.*

However, if it is to be useful to businesses, it must be developed and presented in such a way as to speak directly to them and their needs, and not be presented in impenetrable technical jargon. It must also strike the right balance between spreading the word about technological research and giving information on the latest commercially available technologies and solutions that would be relevant.

It will be essential to draw on industry expertise in developing the proposal, to ensure both that the technologies covered are relevant and that the presentation is right for the target audience. *IAAPA Europe would be pleased to advise this project on behalf of the attractions sector.*

### **Consolidating the socio-economic knowledge base for tourism**

As with the ICT platform, it is far from clear what is envisaged by the proposal of a 'virtual tourism observatory'. If it is seen as a mechanism to facilitate access by tourism businesses to market research, then we could see the value of it. Having market research available on tap, so to speak, in one co-ordinated and easily accessible place could do much to help the industry's marketing efforts.

Once again, the presentation and content would need to be right for a business audience.

### **European 'quality tourism' label**

The views expressed on this at the European Tourism Forum in Malta were very mixed. One speaker commented on the cost of establishing, running and maintaining such a scheme, no matter how easy it may be to define the reference criteria. Another referred to the increasing importance of players such as TripAdvisor and other peer-review websites in responding to market's demand for information.

The idea also comes at a time when there is strong industry opposition to the suggestion of pan-European classification schemes and to the interest of standards bodies (ISO particularly) in creating international tourism service standards. Industry representatives point out that a vital part of Europe's appeal on tourism markets is the diversity in tradition and products to be found across the continent. Destinations and businesses trade on their differences, positioning themselves apart from their competitors rather than trying to be the same.

Pan-European labels are inappropriate, inflexible mechanisms that will be ill-suited to adapting to rapid changes in the marketplace.

*IAAPA Europe counsels strongly against the creation of a new quality label for tourism. There is no industry support for it, the benefit for consumers is debateable and scarce EU resources should be put to more profitable use.*

If, despite industry concerns, a decision is made to go ahead with the development of a European label, we urge the Commission to ensure that the industry is consulted fully. Industry involvement will be essential in ensuring that any label is, at least, practicable from a business and operational point of view. *As the leading association for amusement parks, IAAPA Europe would expect to be consulted and would be ready to advise.*

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