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**Re: Consultation in view of a Commission Communication on the on the new framework for the Tourism policy in the EU**

Dear Madam, dear Sir,

We are pleased to learn that the Commission, in view of the new competence for tourism provided by the Lisbon Treaty, which entered into force on 1 December 2009, envisages preparing a Communication on the new framework for the Tourism policy in the EU.

As you know, the **European Trade Union Liaison Committee on Tourism, ETLC**, is a cooperation platform of the European Trade Union Federations **EFFAT**, **ETF** and **UNI Europa**, and the Global Union Federations **IUF**, **ITF** and **UNI**, representing workers in the various tourism sub-sectors, such as hotels, restaurants, catering, transport, travel agencies, tour operators, leisure parks, tourist offices, tourist guides, etc.

The trade union federations represent and support the interests of the workers in their sectors vis-à-vis institutions, transnational companies and employers' associations, at the respective level of their responsibility and in cooperation with their affiliates.

In October 2009, the ETLC identified the main challenges for the tourism sector and agreed to jointly pursue the objectives laid down in the European Trade Union Charter on Tourism (see attached).

The ETLC welcomes the initiative of the European Commission to consult the stakeholders in view of the Communication on the new framework for the tourism policy in the EU and would like to actively contribute to it. ETLC considers that social partners have a key role in shaping tourism policies.



In general we would like to underline that the importance of workers for the competitiveness and sustainability of tourism needs to be given more consideration.

Already the TSG Report published in February 2007 stipulated “Improving the quality of tourism jobs” as one of the major challenges for tourism in Europe, and identified the provision of quality employment opportunities, with fulltime, year-round jobs and long term contracts, fair salary levels and social security provision for all employees and avoidance of all forms of discrimination as some of the major aims for the sustainability and economic prosperity of European tourism.

On the main three goals proposed by the European Commission, we would like to point out the following:

**On the proposed actions to “Stimulate the competitiveness of the tourism sector in Europe”:**

- The quality of a service that an employee provides is strongly linked to his/her working conditions. Tourism has to be an attractive sector to work in, with income and social security levels, working conditions and career opportunities at least similar to those of other economic sectors. Social dialogue is very important to this end, and it would also improve the sector’s ability to adapt to change. The ETLC calls upon the European Commission to take all pertinent initiatives to develop constructive industrial relations between employers and workers and their representative organisations, and to pursue, in close cooperation between DG EMPL and DG ENTER, the establishment of a Social Dialogue Committee for the tourism sector ensuring that all relevant social counterparts take part in such a dialogue.
- The ETLC proposes the establishment of a European social observatory on tourism, with full involvement of the social partners, to facilitate the monitoring of developments in the tourism sector and the assessment of the social sustainability of the tourism industry.
- ETLC supports the development of social tourism, the right to holiday and access to tourism to all population groups. In this view, close cooperation with BITS has been developed and a study on employment on social tourism has been carried out in 2008.
- ETLC considers that any public subsidy to tourism projects or tourism companies shall be closely tied to the full respect of social standards and labour legislation. Support shall be provided only to initiatives that make an explicit contribution to the creation of sustainable jobs, improve the living and working conditions of workers and their qualification, and include the participation of workers and their representatives. In this respect, social counterparts including the ETLC on the trade union side should be regularly informed and consulted on projects supported by public funding at European and national level.
- The ETLC considers that to enhance the knowledge of the tourism industry, impact assessments should be carried out for all policies and initiatives in the field of tourism at European level. These assessments shall particularly examine the potential effects such

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policies and initiatives could have on employment and social conditions in the tourism sector. The social partners have to be involved in this process.



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Union Network  
International – European  
regional organisation

**ETF**  
European Transport  
Workers' Federation

**IUF**  
International Union of  
Food, Agricultural, Hotel,  
Restaurant, Catering,  
Tourism and Allied  
Workers' Associations

**UNI**  
Union Network  
International

**ITF**  
International Transport  
Workers' Federation



### **On the proposed actions to “Develop sustainable Tourism in Europe”:**

- The ETLC emphasizes that the sustainable development of tourism can only be achieved when – alongside the economic aspects and the protection of environment and cultural heritage – the social dimension is taken into account. The ETLC underscores that employment in the tourism has to be made more sustainable, by reducing the precariousness of work and by improving the social conditions through collective bargaining at the various levels.
- The ETLC calls upon the political actors in charge of tourism at national, regional and European levels to engage in targeted promotion of economically, environmentally and socially sustainable tourism, and promote consumer awareness that high-quality tourism services have their price. The vicious circle of ‘cheap bargain’ travel and tourism has to be stopped, as it undermines the viability of transport and tourism businesses, cuts profit margins, has negative effects on employment and eliminates financial room for manoeuvre to offer socially responsible and environmentally sustainable tourism. With a view on the impact of tourism on the environment and the consequences of the climate change on tourism, new approaches must be taken to make tourists aware that sustainable tourism offering high-quality services has its price.
- ETLC supports the promotion of awareness-raising campaigns to develop responsible attitudes of European tourists by asking them to consider social, environmental and economic impacts in their choice for travel and destinations, before making a decision, and to opt for activities that promote sustainable tourism, reduce their carbon footprint and contribute to sustainable employment and the preservation of natural and cultural heritage.
- Tourism companies are not only responsible for their products and services, but also for the conditions under which these are produced. Corporate Social Responsibility implies the adherence to existing legal obligations at international, national and local level, and the will to go beyond obligatory legal and contractual requirements. The ETLC underlines that companies only do genuine justice to their social responsibility when they involve trade unions and workers’ representatives in the planning, implementation and evaluation of such measures.
- ETLC is currently developing a project on ‘Fair and Responsible Tourism’, aiming at making consumers aware of conditions at destinations from an ethical, social, economic and environmental point of view in order to increase the demand for more responsible tourism.

### **On the proposed actions to “Promote the ‘Destination Europe’ in the main third countries”:**

- As regards the proposal to enhance Europe’s image and its perception as a tourist destination, the ETLC underlines that tourism companies have to comply with the principles and rights as defined by the UN Universal Declaration of Human Rights, the ILO Conventions, the OECD Guidelines for Multinational Enterprises, the UNWTO Code of Ethics, the EU Charter on Fundamental Rights, the European social legislation, and respect fundamental human rights and workers’ and trade union rights at the workplace.



This also includes workers' rights to information and consultation within the company, such as laid down in the European Works Council Directive.

- Furthermore, tourism is a sector with a high percentage of migrant workers and cross-border vocational mobility. The ETLC affirms that the right of workers to free movement shall not result in social dumping and unfair competition. Workers who work in another country have to be entitled to working conditions and social protection at least equivalent to those of workers of the host country, as laid down in laws and collective agreements. All workers working at a certain location have to be treated equally, and migrant workers shall not be discriminated against.

We very much hope that these comments will be taken into account in the drafting of the Communication on the new framework for the Tourism policy in the EU, and we are ready to discuss with you the concrete implementation of the actions proposed.

Yours sincerely,

Kerstin HOWALD  
ETLC Coordinator