

# Position Paper

## UEAPME<sup>1</sup> position on the Consultation Paper “Implementation of the European Tourism Quality Label”

UEAPME warmly welcomes the consultation on the European Tourism Quality Label.

As UEAPME has already repeatedly stressed, no studies were produced so far on what are the best ways to communicate product / service information to consumers. It would be recommendable to first elaborate such a global study, and an impact assessment, before proposing any new initiative in this field.

Nevertheless, as there is already a proliferation of labels on the market, the creation of an “umbrella” label assessing and recognising the existing quality systems is very positive.

The claimed objectives of the ETQ Label are very clear for Europe, for tourism business and for consumers.

It must be emphasised that a quality label can only be a success and will only be accepted by the tourism industry if it is kept smart and simple with as little bureaucracy as possible and if there is a clear added value for tourism businesses. The objectives of the Label as mentioned in the consultation paper should thus be achieved (competitive instrument, promotion tool, management tool, information tool). The label and the criteria should be kept simple, transparent and clear. Therefore, UEAPME is not in favour of additional national criteria.

With regard to the proposed European Tourism Quality Label (ETQ), some more background information would be needed:

- What will be the financial and time investment? The expected administrative burden?
- How many national and regional systems that could be recognised under the ETQ do already exist?
- How successful are these labels? Are they well received by the businesses, by the consumers? Is there any data available concerning the influence of labels on the decision-making process of consumers? (As mentioned before, a study in this field would be recommended)
- Is it guaranteed that in all Member States labels that would fall under the ETQ exist? What if in some Member States no labels or quality evaluation systems exist and the individual tourism establishments and services in these Member States are therefore not able to apply to the ETQ and cannot benefit from it? (distortion of competition)

According to UEAPME, the use of a test phase and eventually limiting the scope in a first phase would be useful. However, limiting the ETQ exclusively to accommodations could be problematic, as the existing labels normally recognise a wider range of businesses and/or services, or are general quality management systems available to any type of business of any economic sector. In any case, it must be ensured that from the beginning small enterprises are involved in this test phase, thus applying the “Think Small First” principle.

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<sup>1</sup> UEAPME subscribes to the European Commission’s Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

It should be avoided to create too many additional structures or bodies, which would lead to higher costs. We believe that it would be sufficient to install an ETQ Board at European Level. Third-party auditors would guarantee higher objectivity. For cost reductions, auditors could also be members of the board, provided that they have experiences in quality management issues.

As tourism covers a very wide range of sectors and services, SME organisations should be represented in the board. UEAPME questions the added value of the trade unions in the ETQ board.

It is evident that businesses have to respect and follow national, regional and local laws. On the other hand it is impossible, let alone not acceptable to define “(national/regional) identity”.

According to UEAPME, any type of successful quality system should be recognised - including transnational and private initiatives for a certain group of businesses regardless of their years of existence.

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