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GREEN PAPER

Safety of Tourism Accommodation Services

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Contents

1. INTRODUCTION

Europe is the number 1 tourism destination in the world. In 2013, more than 560 million international travellers arrived in Europe, a result which surpassed the very good figures of 2012. Growth was particularly strong in Southern and Central Europe[1].

Our continent is also the tourism destination preferred by Europeans themselves. In 2013, almost 40% of Europeans spent their holidays in the EU, 5% more than in 2012.

According to the last Eurobarometer survey[2], tourists in Europe feel safe and very satisfied. Respondents expressed a high level of satisfaction with most aspects of their 2013 holiday, in particular with the safety (95%) and the quality (95%) of their accommodation.

To maintain and reinforce Europe's leading position in tourism in the world, in 2010 the Commission adopted a Communication laying down a comprehensive strategy to boost the competitiveness of the sector. The safety of tourism accommodation features as one of the actions in this Communication. In fact, adequate and efficient safety levels can enhance consumers' confidence and boost growth by creating a favourable environment for enterprises and for cooperation among Member States and allowing for higher competitiveness of the tourism sector.

In 2013, the number of nights spent in tourist accommodation establishments in the EU28 reached a peak of 2.6 billion nights[3]. Further, the number of nights spent in tourist accommodation establishments by non-residents[4] (i.e. guests from other countries) grew by 4.8% in the EU28 between 2012 and 2013, reaching in 2013 a 45% of the total nights spent.

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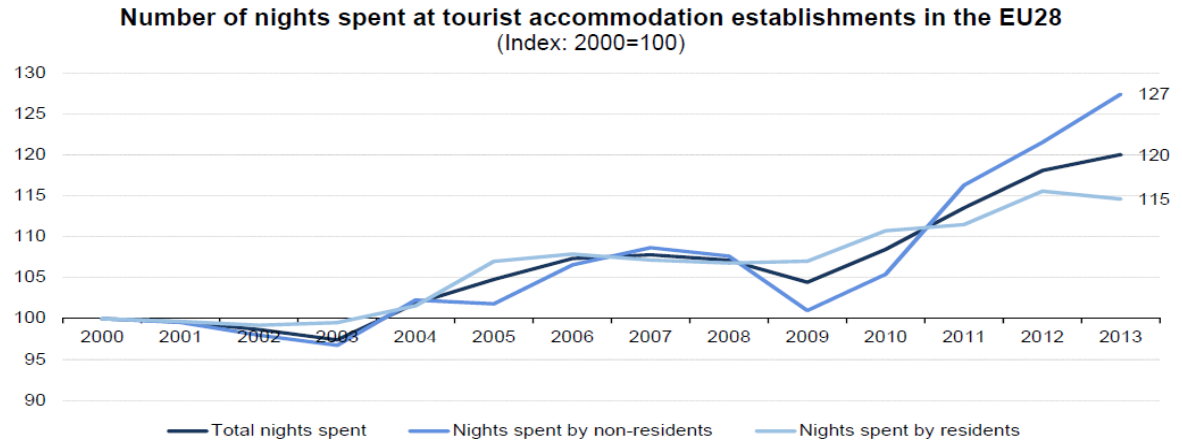
1 UNWTO Tourism Barometer, January 2014 http://media.unwto.org/press-release/2014-01-20/international-tourism-exceeds-expectations-arrivals-52-million-2013

2 http://europa.eu/rapid/press-release_IP-14-144_en.htm

3 EUROSTAT. Summary press release of 29/01/2014 at http://europa.eu/rapid/press-release_STAT-14-16_en.htm

4 In the context of this data, a night spent (or overnight stay) is each night a guest/tourist, non-resident of the country, actually spends in a tourist accommodation establishment. For a definition of the scope of tourist accommodation establishments, see Chapter 2 of this Green Paper.



Number of nights spent at tourist accommodation establishments in the EU28		
Total nights spent	Nights spent by non-residents	Nights spent by residents

In some countries, like Malta, Cyprus or Croatia, tourism accommodation occupancy relies almost in its totality on non-residents (96%, 93% and 92% respectively), whilst in others like Romania (18%), Poland or Germany (in both countries 20% non-resident occupancy) the situation is exactly the opposite.

Tourists concerns about safety have been regularly monitored every year since 2008 through Eurobarometer surveys, also with emphasis on hotel safety and fire safety. The annual surveys consistently confirmed that safety is never a concern for European tourists (replies ranked between 0% and 1%). Yet, accidents can occasionally occur, affecting directly the concerned operators, but also indirectly the reputation of the relevant destination with additional negative impacts on other operators. Although the safety of tourism accommodation services is the competence of Member States, the presence of such strong cross-border dimension suggests a reflection on the quality and safety levels of these services across Member States.

This, together with the indications of the 2003 Commission report on the Safety of Services for Consumers[5], which recommended to improve the knowledge base about risks and accident data and to monitor systematically the policies and measures of the Member States, has led the Commission to consider the issue of tourism accommodation services safety at European level in the past years, both by engaging in dialogue with relevant stakeholders and by undertaking actions aimed at strengthening the existing knowledge base.

A series of studies and workshops on methodologies for data collection on accidents and injuries related to services have provided deeper insight into this matter (see section 2.1 in Annex 1). The Commission has supported and facilitated debates around self-regulatory initiatives from the hospitality sector, and also on views on the best ways forward. (see section 2.2 in Annex 1) Attempts to identify safety risks and to collate relevant data in the tourism accommodation sector have recently been made, and have invariably shown the

[5] http://ec.europa.eu/consumers/cons_safe/serv_safe/reports/safety_serv_rep_en.pdf

complexity of the task, due to a mix of factors such as the variety of hotels within the sector or reputational issues[6].

Although certain legal requirements on tourism accommodation fire safety stem from the Constructions Products Directive and EU legislation on occupational safety, no specific horizontal legislation exists at EU level and no standard approach with regard to safety of tourism accommodation services is in place at national level, as shown by a recent consultation to Member States on the existing regulatory and non-regulatory framework regarding safety in tourism accommodation, amongst other sectors.

Safety in tourism accommodation -and in the HORECA sector in general- is also an important part of Health and Safety at work[7]. Furthermore, there is a well-established corpus of sector legislation concerning building environments, lifts, and other products used in the construction sector.

The existence of different approaches to safety regulations is not an issue *per se,* as long as the European consumer using this type of service across the EU is adequately protected irrespective of his/her choice of destination.

Consumers expect to be able to purchase tourism accommodation services with confidence for their own safety regardless of their choice of accommodation or destination within the EU. In this context, and on the basic assumption that European consumers have a right to adequate levels of safety which are implemented and enforced effectively wherever they go within the EU, the following questions are relevant:

1/ How is c**onsumer safety** in the area of tourism accommodation **regulated** and **monitored** across Member States?

2/ Are tourism accommodation service providers operating across borders subject to requirements which appropriately ensure the protection of consumers, and for whom cross-border operation does not imply eluding any such requirements due to the existence of critical **gaps**?

3/ Does the diversity in the national systems and in the surveillance and enforcement methods used throughout the EU have a significant effect on the provision of accommodation services **across borders**?

4/ Are certain **cross-cutting aspects** efficiently being taken into consideration, such as the impact of the regulatory environment on SMEs and on vulnerable consumers, or the way in which accessibility issues or the use of standards for such services is currently integrated in the exiting regulatory framework?

5/ Are the current **levels** at which tourism accommodation safety is regulated the most appropriate and are the most appropriate types of instruments in place?

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6 In 2010 the Commission launched a study with the aim to have a description of the major safety risks in the hotel sector in the EU and to carry out an inventory of injuries and accidents occurred in recent years. The variety of the hotel sector and the lack of availability of accident records relating specifically to the provision of the service, linked to also reputational issues, finally did not allow the contractor to collect and analyse the desired data.

7 https://osha.europa.eu/

It is a fact that the existence of different approaches to regulating safety makes a comparison more difficult of the safety protection that European citizens using tourism accommodation services across the European Union enjoy.

In answer to the **first question** regarding the existing regulatory framework across the European Union, and according to the most recent knowledge available to the Commission services, there seem to be important differences between national legislations. The results of a survey carried out in 2013 have shown that out of 24 responding Member States, 16 have specific sectorial legislation regarding tourism accommodation services. There also seem to be substantial differences when it comes to the extent and content in national, sectorial legislation: as an example, while a majority of these 16 Member States include in their legislation obligations related to the condition of the premises or the qualifications of the service provider, only 8 require the establishment of competent authorities to monitor and take action, and only 5 Member States include obligations to identify and assess risks.

In addition to the existing regulatory framework in the member States, another issue to take into account is whether and how such framework is being enforced and monitored. This paper seeks better insight into this aspect as well.

In relation to the **second question**, this paper seeks to explore whether the existence of different requirements across Member States might give rise to gaps in safety levels, especially when service providers operate across borders and might not be adequately captured by the existing legislation in any Member State.

As for the **third question** regarding the provision of the service, it is designed to ascertain whether this diversity in the national systems impacts the level playing field in a sector which is critical for the EU's economic well-being and its image as a desirable tourist destination, particularly for certain service categories operating cross border. In this context, account is also to be taken of industry-developed instruments and practices[8].

Regarding the **fourth question**, it is clear that, for a correct balance between needs and solutions, impacts on all parties involved must be carefully considered. Vulnerable consumers, consumers with specific accessibility needs, smaller premises or large hotels may look at this issue from different perspectives and therefore different considerations must be taken into account. In this context a discussion on the benefits of the use of standardisation in relation to tourism accommodation services across the EU would also be relevant.

Finally, in relation to the **fifth question** it would remain to be discerned the level at which safety in this area would be best addressed for the benefit of both consumers and businesses.

Quantitative measurements to assess the issues raised above are scarcely available due among other reasons to the fragmented approach to data collection on accidents and injuries related to the provision of tourism accommodation services across the EU (see section 2.1 in Annex 1). In the absence of such quantification, this paper seeks to gather as much evidence and data as possible.

[8] These practices include the MBS Methodology (Management, Buildings and Systems) and similar instruments, inasmuch as they carry safety-related provisions and prescriptions.

2. SCOPE

According to NACE, the statistical classification of economic activities in the European Community, tourism accommodation establishments providing as a paid service short-term or short-stay accommodation services are classified as follows[9]:

(1) Hotels and similar accommodation[10]

- Hotels (and similar establishments, e.g. operating under the name 'bed & breakfast');
- Resort hotels;
- Suite/apartment hotels;
- Motels.

This class excludes the provision of homes and furnished or unfurnished flats or apartments for more permanent use, typically on a monthly or annual basis[11].

(2) Holiday and other short-stay accommodation[12]

- Children and other holiday homes;
- Visitor flats and bungalows;
- Cottages and cabins without housekeeping services;
- Youth hostels and mountain refuges.

This class excludes the provision of homes and furnished or unfurnished flats or apartments for more permanent use, typically on a monthly or annual basis.

(3) Camping grounds, recreational vehicle parks and trailer parks

[9] Regulation 692/2011 concerning European statistics on tourism (http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:192:0017:0032:EN:PDF) defines a tourist accommodation establishment as a local kind-of-activity unit […] providing as a paid service -although the price might be partially or fully subsidized- short-stay accommodation services as described in groups 55.1 (hotels and similar accommodation), 55.2 (holiday and other short-stay accommodation) and 55.3 (camping grounds, recreational vehicle parks and trailer parks) of NACE Rev. 2 (Article 2(1)(l)).

[10] This class includes the provision of accommodation, typically on a daily or weekly basis, principally for short stays by visitors. This includes the provision of furnished accommodation in guest rooms and suites. Services include daily cleaning and bed-making. A range of additional services may be provided such as food and beverage services, parking, laundry services, swimming pools and exercise rooms, recreational facilities as well as conference and convention facilities.

[11] Rented private holiday accommodations (such as flats or villas - generally rented for short period rarely exceeding one month) are also "paid-for" accommodations like hotels, yet they are not subject to the same legal requirements as hotels which might have to be reflected where they equally pose safety risks.

[12] This class includes the provision of accommodation, typically on a daily or weekly basis, principally for short stays by visitors, in self-contained space consisting of complete furnished rooms or areas for living/dining and sleeping, with cooking facilities or fully equipped kitchens. This may take the form of apartments or flats in small free-standing multi-storey buildings or clusters of buildings, or single storey bungalows, chalets, cottages and cabins. Very minimal complementary services, if any, are provided

- Accommodation in campgrounds, trailer parks, recreational camps and fishing and hunting camps for short stay visitors;
- Space and facilities for recreational vehicles.
- Protective shelters or plain bivouac facilities for placing tents and/or sleeping bags.

The focus of this consultation is on tourism accommodation services in coherence with the definitions included in the classification above. Such services are indeed used by consumers on an occasional basis and often abroad, where they might be less familiar with the environment, culture, tradition, language and legal system.

The debate on tourism accommodation safety has revolved until now mainly around fire safety issues. Indeed, while hotel fires account for only a very small percentage of fire-related casualties, accidents may potentially have high impact.

Nonetheless, different stakeholders argue that tourist accommodation safety is not only about fire safety. Other safety aspects include the state of the premises (leisure facilities, balconies, bedrooms, bathrooms, corridors, glass doors, etc.) or the risks related to carbon monoxide leaks (e.g. from misuses or fallacies in the heating systems in tourism accommodation), which are sometimes responsible for a greater number of injuries, illnesses, or fatalities.

Case example

Carbon monoxide in tourist accommodation

In 2006, two British children were killed by carbon monoxide poisoning whilst on holiday in a hotel in Corfu, Greece. A chimney to bring in oxygen and remove carbon monoxide had not been fitted and was lying on the floor, along with a piece of rock propping the boiler up. A thermostat designed to cut out the boiler if it began emitting noxious fumes had been wired out. Carbon monoxide had leaked out of the boiler room and into the bungalow through holes which had been drilled through the living room wall for an air conditioning system and not filled in. A fatal carbon monoxide level built up inside the bungalow within one minute.

3. OBJECTIVES

The purpose of this document is to launch a public consultation on the safety of tourism accommodation services. The objectives are to gather input from all relevant parties involved in the issue of tourism accommodation services with an aim to evaluate whether the issues outlined above are sufficiently and effectively addressed and whether there is evidence of new risks and whether the existing tools are adequate. This paper furthers asks about the level at which action would be most effective to usefully contribute to effective levels of safety for consumers. The paper would also seek help in quantifying these issues.

Bearing in mind also that the Commission aims to foster the competitiveness of the tourism sector by creating a favourable environment for enterprises and for cooperation among Member States, and that the sustainability of European tourism relies on the quality of the tourist experience and by extension on its safety, this paper intends to identify options for furthering confidence building both for enterprises and consumers.

4. QUESTIONS

The questions below aim at evaluating the five fundamental aspects identified earlier in this paper: whether the **existing instruments** and their implementation are **adequate and sufficient (1)** by measuring the nature and extent of the safety risks and their link to flaws or **gaps (2)** in the current legislative framework, and to what extent they have an impact on the provision of such services **across borders (3)** as well as **on SMEs and vulnerable consumers (4)**, in order to make a clear distinction of what objectives are best met at which **level (5)**.

Annex 1 gives a detailed description of the current knowledge regarding the aspects outlined in the previous paragraph, and is intended as reference material when addressing the questions below.

4.1. Existing instruments

The safety of consumers when using tourism accommodation services must first of all be evaluated by assessing the existing regulatory environment across the EU and its implementation.

4.1.1. National level

Q 1 – Can you give reference(s) to tourism accommodation safety regulations at national level in specific country or countries?

Q 2 – Do you consider that the existing rules at national level are adequately addressing risks and therefore efficiently ensuring the protection of consumers? Please indicate your reasons and any evidence to support your position.

4.1.2. European level

The Council Recommendation 86/666/EEC on fire safety in existing hotels is the only European instrument in the field of tourist accommodation safety. The Commission has recently taken initiatives to assess whether the current Recommendation should be reviewed and updated with the view to ensuring the highest possible level of safety in hotels throughout the EU.

Q 3 – Is the existing 86/666/EEC Recommendation sufficient to meet the safety requirements in tourism accommodation safety?

Q 4 - If you have evidence of the opposite, which are the areas which need improving?

4.1.3. Monitoring and enforcement

It is relevant to know whether there are requirements for market surveillance in tourism accommodation safety-related legislation in Member States. Such requirements relate to obligations in terms of:

- Establishment of authorities responsible for monitoring service safety and with powers to take appropriate measures,

- Procedures for exchange of information on policy and regulatory developments,
- Administrative cooperation between the authorities,
- Systematic collection and assessment of data on risks of services,
- Development of enforcement indicators for compliance monitoring

Q 5 – How are the existing rules enforced (by whom, when, how often, etc.)?

Q 6 – How do you rate the effectiveness of the existing market surveillance mechanisms?

Q 7 – What are in your view the main issues related to enforcement of existing legislation? How could the implementation of existing instrument be improved?

Q 8 –What areas do you feel could benefit most from more cooperation between Member States in the area of tourism accommodation safety? What would be the main challenges?

4.2. Consistency of national approaches

Any attempt to identify potential gaps in tourism accommodation safety rules which might be affecting consumers across the EU must be made from the perspective of the effectiveness of the extent and content of the existing instruments.

The actual safety level of a service is determined by the aggregate effects of the following main components:

- Safety of the premises, structures and equipment used for providing the service;
- Safety management (including risk assessment to evaluate the extent of the risk and take the appropriate safety measures accordingly);
- Qualifications of the service provider;
- Staff training;
- Availability and quality of the information on safety aspects of the service provided to the users/consumers;
- Availability of evacuation plans, emergency procedures and equipment to reduce damage in case of accidents;
- Notifications to authorities on risks and accidents;

In particular, for tourism accommodation services special attention is needed for[13]:

- A consistent definition of tourism accommodation premises (type, age, size, height);
- Accessibility aspects;
- Specific requirements for vulnerable consumers;

[13] Food safety issues are excluded from the scope of this paper as they are specifically covered by Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, OJ L 31, 1.2.2002, p. 1–24.

- Fire related risks;
- Carbon monoxide (CO) related risks.

Q 9 –How is tourism accommodation defined in your national relevant legislation?

Q 10 – Are the definitions of type, size, height and age of tourism accommodation establishments present in existing legislation suitable?

Q 11 – Are the requirements listed above present in the existing national legislation?

Q 12 – Would the consideration of requirements regarding CO (carbon monoxide) safety issues be beneficial? Please indicate the advantages for both consumers and enterprises.

Q 13 – Is risk management integrated in relevant national legislation?

Q 14 – Is the difference in existing regulatory frameworks likely to affect the safety of tourists? Is this impact rather related to the enforcement of such framework? Could you please provide some concrete examples?

4.3. Impact of the existing regulatory situation on the Internal Market

The purpose of this paper is to assess the effectiveness of the existing instruments in the protection of European consumers. However, also the impact of such framework in the internal market should be quantified in order to evaluate any potential market distortion due to differing rules.

Q 15 – Are the differences in the regulatory environments in the EU member States affecting tourism businesses, especially in their cross-border operations? Is this impact rather related to enforcement of the existing legal frameworks? Can you please provide concrete examples?

4.4. Cross-cutting aspects

4.4.1. Small and medium-sized enterprises

Small or micro sized tourism enterprises play an indispensable role in European tourism. 90% of tourism enterprises (including accommodation establishments) in Europe are SMEs and micro-SMEs.

According to the "Think Small First" principle, the general policy is to exempt micro enterprises and small businesses fully or partially from administrative burdens wherever possible[14]. While compliance with safety requirements might indeed be more costly and time consuming for smaller than for larger companies, the right balance must be struck between the need for better regulation and the safety of the consumer.

[14] Report from the Commission to the Council and the European Parliament 'Minimizing regulatory burden for SMEs-Adapting EU regulation to the needs of micro-enterprises', COM(2011) 803 final

Q 16 - Please quantify the current administrative burden for tourism enterprises to comply with existing safety regulations.

Q 17- Please indicate what are the most burdensome/costly aspects for tourism enterprises to comply with national legislation on safety.

Q 18- Which are the main concerns of smaller tourism accommodation providers in relation to compliance with existing safety rules?

4.4.2. Accessibility and vulnerable consumers

An ageing population entails challenges and opportunities for the tourism accommodation sector, both from a growth and a safety angle. Forecasts announce that the number of persons aged over 65 is expected to reach 20% of the population in 2020[15]. This population group, consisting of individuals with both purchasing power and leisure time, represents significant market potential. However, for this potential to be exploited, key measures should be taken on aspects connected to their safety and accessibility.

Specific safety measures also for certain categories of vulnerable consumers have to be assessed, due to possible accessibility needs. According to some studies[16] the potential market for accessible tourism has been estimated at around 127 million persons. This figure takes into account travellers with special access needs (long term/permanent physical impairments, temporary impairments, elderly, accompanying persons or caregivers or families with young children). Fire safety measures, as well as evacuation or emergency plans in tourism accommodation services offered to consumers have to take into account the special needs of persons with disabilities and reduced mobility.

On different grounds, but still within the group of vulnerable consumers, safety measures for persons aged under 15 need to receive a special degree of attention.

Q 19 – How can the compatibility best be ensured of safety measures and rules with accessibility requirements which are relevant for persons with disabilities and older persons?

Q 20 – Beyond accessibility issues, which are in your view the aspects regarding safety in tourism accommodation for ageing population which should be considered?

Q 21– Beyond accessibility issues, which are in your view the aspects regarding safety in tourism accommodation for people with disabilities which should be considered?

Q 22 – Which are in your view the aspects regarding safety in tourism accommodation for persons under 15 which should be considered?

4.4.3. Data on injuries and accidents

15 Source: Eurostat, Statistics in Focus 43/2012 "Europeans aged 65+ spent a third more on tourism in 2011 compared with 2006", Figure 11 (http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-SF-12-043/EN/KS-SF-12-043-EN.PDF).

16 http://www.accessibletourism.org/resources/enat_igm_3eichhorn.pdf

Factual information on the safety situation in the tourism accommodation sector across the European Union is lacking. This is true across European countries and where data exists, sources are not harmonised and aggregated for surveillance across Member States, making it very difficult to produce a systematic overview about injuries and accidents linked to the provision of tourism accommodation services. Even in the countries where data are available from a variety of sources like fire departments, insurance companies, emergency departments in hospitals, the registrations do not allow for comprehensive and comparative data to be obtained. Specific studies on data collection for accidents and injuries in relation to tourism accommodation services consistently mention a difficulty to obtain data at EU level (see section 2.1 in Annex 1).

Q 23 – Do you have data or quantitative evidence on injuries and accidents pointing to safety issues in tourism accommodation? If yes, please provide such data or evidence.

Q 24 – Which are in your view the main challenges related to the collection of such data and how can they be best addressed?

Q 25- In your view, to what extent does reluctance to make available data on accidents and injuries due to possible reputational costs may have an impact on safety issues?

Q 26 – What would in your view be the most appropriate and effective system to collect minimum harmonized data on accidents and injuries?

4.4.4. Standards

Safety issues are also taken into account in the field of service standardisation by European Standardisation Organisations. The expansion of work in the field of service standardisation is a priority for the Commission, which is assessing the option to include the safety dimension in upcoming standardisation work requested by the Commission[17].

Q 27 – How would European safety standards help improve consumer safety in tourism accommodation? What would be the main drawbacks? Please elaborate your answer both from a national and a European perspective.

Q 28 – If you have examples of national standards regarding tourism accommodation safety, do you have evidence that they have helped improve safety levels for consumers?

4.4.5. Skills and training

Safety awareness, capacity building and training are essential. Vocational and educational training for staff and managers is instrumental for identifying risks even before they arise and implement correctly existing regulations. Yet, tourism training in the Member States differs substantially from one Member State to another. This can potentially lead to differences in the existence and provision of dedicated training on safety and the presence of the right skills in the sector.

[17] The Union's Work Programme for standardisation is adopted annually

Q 29 – Is dedicated fire safety/safety training for tourism accommodation services regularly provided in national curricula or in vocational training? If so, what subjects are covered?

Q 30 – Are there specific job profiles dedicated to safety in tourism accommodation? If so, what subjects are covered?

4.5. Most appropriate level and instruments to address safety

4.5.1. Level

At present Member States are responsible for the definition, application and modification of rules regarding safety in tourism accommodation safety.

Q 31 – Do you have evidence against/in favor of the effectiveness of addressing safety in tourism accommodation at national/local/European level?

Q 32 – Which would be the advantages of approaching safety issues at national / local / European level, both from a consumer and a service provider perspective? Which would be the main disadvantages?

Q 33 – Which would be the advantages of European legislation in terms of improved safety levels on tourism accommodation safety?

Q 34 - Could the same advantages be achieved by improving enforcement and/or market surveillance of existing national legislation?

4.5.2. Alternative instruments

The use of self-regulation as an alternative tool to legislation is also possible for tourism accommodation service providers and its effectiveness must also be evaluated.: common voluntary guidelines (for instance, guidelines for risk assessment) or codes of good practices are also a way to integrate at European level the relevant safety aspects to fulfil potential gaps, taking into account the cross-border characteristics of the safety risks involved.

The MBS methodology is one example of self-regulatory action. These guidelines for hotel fire safety with requirements for Management (M), Buildings (B) and Systems (S) are meant to help hotels of all sizes across Europe adopt a high level of fire safety, in support of national/regional and local regulations and standards[18].

Q 35 – What experiences have been gained by using non-regulatory approaches in your country?

Q 36 - Which would be the practical advantages of the use of self-regulation at European level?

[18] Other examples of self-regulation include the strategic framework for hotel safety and security of the Intercontinental Hotel group (IHG), a risk management process to enable and support hotel owners and staff to manage risk effectively; or the Carlson and Rezidor hotel group's TRIC=S formula for structuring safety and security (Threat assessment + Risk mitigation + Incident response + Crisis management, Communication and Continuity = Safe, Secure and Sellable brands).

Q 37 – What would in your view be the role of the Commission or other EU institutions in the context of self-regulation?

Q 38 – Could the MBS Methodology be used as a basis for the compilation of best practices and the identification of self-regulatory norms, with appropriate adaptations?

Q 39 –Which adaptations to the self-regulatory instruments currently in place would be necessary to fully achieve their objectives?

Although the MBS methodology has already been adopted by many national hospitality associations in the EU, it remains voluntary and does not include monitoring or performance reporting. The effectiveness of non-regulatory measures depends on the support they receive from industry, authorities and consumers, and at the same time, they need to be based on adequate monitoring of its performance and outcomes. Safety guidelines developed by individual organisations can be interesting for others, on the condition that they are sufficiently shared.

Q 40 – What is the most effective way to monitor voluntary safety measures?

Q 41 – What are your views on knowledge sharing regarding voluntary tools across the EU (benefits/drawbacks, potential difficulties, success stories, etc.)?

4.6. Final question

Q 42 - Do you have any other comments or suggestions regarding tourism accommodation safety?

5. CONCLUDING REMARKS

The purpose of this document is to collect information on factual aspects and on the position and expectations of interested parties as well as to stimulate a public debate on the safety of tourism accommodation services. The European Commission is committed to a careful consideration of policies, proposals and of every other instrument at all stages, from the planning to the implementation and the review[19]. Consequently, the Green Paper is designed to acquire appropriate knowledge of the issues it covers, and it does not imply a pre-determined course of action –or the need of new measures at the EU level- as a result of the consultation.

The Commission invites all interested parties to submit their contributions in response to the questions raised in this document. Contributions do not necessarily need to cover all of the questions raised in this paper.

Contributions will be published on the internet, unless the respondent explicitly requests that the submission should be treated confidentially. It is important to read the specific privacy statement on how your personal data and contribution will be dealt with.

[19] http://ec.europa.eu/smart-regulation/index_en.htm

A report summing up the contributions will also be published on our website: http://ec.europa.eu/dgs/health_consumer/dgs_consultations/ca/consultation_20141130_tourism_en.htm

Any further questions can be sent to:

SANCO-GREEN-PAPER-TOURISM-ACCOMM-SAFETY@ec.europa.eu