Berlin, 30 June 2017

Brot für die Welt

Brot für die Welt –
Evangelischer
Entwicklungsdienst

TOURISM WATCH

Antje Monshausen
Tel   030 65211 1807
Fax   030 65211 3807

tourism-watch@brot-fuer-
die-welt.de
www.brot-fuer-die-welt.de

Evangelisches Werk
für Diakonie
und Entwicklung e.V.

Caroline-Michaelis-Straße 1
10115 Berlin

Spendenkonto
Konto-Nr. 500 500 500
BLZ 1006 1006
Bank für Kirche und
Diakonie
IBAN DE10 1006 1006
0500 5005 00
BIC GENODED1KDB

Mitglied der
actalliance

Discussion Paper Tourism for Development

Dear Sir or Madam,

On behalf of the members of the Transforming Tourism Initiative[1], we follow your invitation to give feedback and to comment on the "Tourism for Development Discussion Paper, April 2017".

We appreciate the efforts of UNWTO to call for comments on the paper in order to advance further debate and critical reflections. We understand that the collected feedback on the discussion paper and cases will be integrated into a final report on the IY2017. However, how this additional input will translate into further strategic actions and activities remains vague to us. Due to the lack of clarity in these regards, we limit our comments on:

1. general observations and shortcomings of the discussion paper and
2. institutional advancements within the UNWTO that are the preconditions for the necessary change.

Some NGOs and networks that jointly developed the Transforming Tourism declaration are open to get involved in a more strategic and in-depth debate, as soon as there is a clear description of the aim and their roles in such a process, which itself needs a clear timeframe and monitoring. As evidence of your interest in further cooperation with civil society organizations, we expect your response and first ideas within 2017, the International Year on Sustainable Tourism for Development (IY).

Yours sincerely

Antje Monshausen
Head of Tourism Watch, Bread for the World, Germany

---

[1] **The Transforming Tourism Initiative**

The Transforming Tourism Initiative was started by representatives of non-governmental organizations, people's movements and academia. Its members are committed to achieve the vision of the 2030 Agenda for Sustainable Development of a just, inclusive and equal world. As tourism experts and practitioners the involved organizations are concerned that the current dominant tourism model is not able to support the necessary transformation of our world envisaged by the 2030 Agenda. On the contrary, in too many cases tourism is exploiting people, harming communities, violating human rights and degrading the environment.

The background document of the Transforming Tourism Initative is an online compendium in which authors from different backgrounds put together case studies, academic analysis as well as experiences from the local ground on the connection between tourism and sustainable development in each of the 17 Sustainable Development Goals (SDGs). They also developed recommendations on how to realize the necessary shift in tourism.

These analyses were the starting point for further discussions among the participants of the Transforming Tourism meeting in Berlin from 3 to 6 March 2017. More than 30 participants from 19 countries from Africa, Asia, the Americas and Europe brought together their ideas, experiences and concerns, developed and adopted the Berlin Declaration on "Transforming Tourism", which is today adopted by hundreds of individuals and more than 40 national and international organizations.

Contact: Transforming Tourism Initiative
c/o Tourism Watch - Bread for the world, email: tourism-watch@brot-fuer-die-welt.de, Phone: +49 30 652 11 1806

1. General Observations and Shortcomings of the Discussion Paper

The first sentence of the executive summary sounds very promising: "The IY is a watershed moment for making tourism a catalyst for positive change." We understand this sentence as a clear rejection of a business-as-usual approach and as a strong demand for a transformation in tourism. This is in line with the 2030 Agenda on Sustainable Development with its visionary title "Transforming our World". The specific inclusion of tourism in the 2030 Agenda is an acknowledgement of the global significance of the sector; but at the same time creates an obligation to transform the current consumptive business model, which is incompatible with sustainable development.

In this context, we call on UNWTO to take the [Berlin Declaration on Transforming Tourism](#) and the [Online Compendium](#) by the same title into serious consideration as a frame of reference for the necessary and urgently needed transformation in tourism in accordance with the 2030 Agenda.

In contrast to this first sentence, the discussion paper itself is not as visionary. It is divided into five thematic sections resulting in incoherent and fragmented analyses. This neither does justice to tourism as a cross-cutting industry, nor to the 2030 Agenda and the complex interconnections between all 17 SDGs. The discussion paper is a compendium of case studies, recent reports and empirical evidence that show the positive but also the negative impacts of tourism. The analytical conclusions drawn from this in many cases are characterized by an over-estimation of the positive impacts and unambitious calls for action to prevent the negative ones.

In the course of the commenting to this discussion paper, the report calls for even more "case studies that highlight the contribution of tourism towards sustainable development". It is our worry that a fragmented patchwork of a few isolated positive examples or successful projects will be submitted, without a comprehensive analysis of structural challenges inherent to tourism development with effective strategies on how to overcome them.

Furthermore, the discussion paper misses the opportunity to identify the contradictions between tourism growth and ecological and social justice. The complexity and interdependency of the 2030 Agenda with its 17 SDGs reminds us to be ambitious, honest, clear, creative and transformative. Therefore, such contradictions must be clearly identified and addressed.

1.1. Monitoring Tourism's Impacts on Sustainable Development

In this context, we want to emphasise that the development of tourism per se must not be an end-goal in itself. Instead all efforts should concentrate on the structural transformation of tourism. The tourism related indicators within the 2030 Agenda, but also in this report, are unduly focussed on a poorly regulated and contradictory growth paradigm. UNWTO should develop additional (qualitative) indicators, which measure to what extent tourism contributes to sustainable development. Factors, such as the improvement of the well-being of local people, dignity of workers, environmental integrity as well as the elimination of exploitation, inequalities and poverty, need to be considered. Effective monitoring mechanisms are indispensable to not merely measure economic, but also social and environmental effects of tourism development and to hold the international community to account.

1.2. Participation

The report rightly states "tourism is a people-centred activity" (p. 18). People, their human rights and the self-determination of communities must be at the core of all tourism development. This includes the right to meaningful participation and consultation including the governance principle of free, prior informed consent (FPIC), as described in the UN Declaration on the Rights of Indigenous Peoples. However, within the report, FPIC is only mentioned as a principle to be applied at local destination level if indigenous communities are involved. It is our firm believe that this is not sufficient. FPIC must be mainstreamed so that all communities are empowered to freely decide on whether, to what extent and in what form tourism takes place. The fair and equitable participation of all groups within local communities - especially excluded and marginalized groups, such as women, children, minorities, the elderly and disabled- must be ensured by all stakeholders involved, from international to local governments and tourism businesses.

If tourism is developed, it needs to seek a widespread and fair distribution of economic and social benefits throughout the recipient communities, including improving local prosperity, quality of life and social equity. In this context, the local community must be enabled to self-determine lines of growth that must not be crossed. If they are involved from the start, an enabling business environment can be created with and for them, integrating business opportunities for small and medium providers directly in tourism, but also along the supply chain hence strengthening local economies. The more revenue is generated by the community directly, the less leakage will occur enabling the community to self determine and further its own sustainable development.

1.3. Enforcing Binding Regulation for Change

Increasingly complicated corporate ownership structures, complex value chains and opaque financial models demand stronger regulation, transparency and accountability. We are therefore concerned that the call towards more deregulation and open markets within Theme 1 of this report, will contribute to a democratic deficit, lead to the exclusion of small and local businesses and worsen already precarious working conditions in tourism.

Without any binding regulations for tourism businesses, there will be no true transformation of the sector. There are numerous UN treaties and conventions, such as with strong connections to tourism development, which many of the member states have ratified. We call on UNWTO to support national governments to introduce regulations on corporate accountability and reporting with robust enforcement mechanisms in line with the ratified UN instruments, such as the UN Guiding Principles on Business and Human Rights. Subsidies should be tied to compliance with sustainable standards in order to avoid market distortions towards harmful products.

For more information, cf. [Chapter 12: Responsible Consumption and Production](#)

1.4. Theme 1: Sustainable economic growth

The discussion paper puts an unjustified focus on "spearheading growth" under the pretext of fostering development. It is irresponsible and contradictory to the idea of sustainability to promote unconditional growth without involving the local communities, fair distribution of costs and benefits from tourism development and defining the limits of tourism growth.

Theme 1 demands the opening of markets through more free trade agreements (FTA) and more Foreign Direct Investments (FDI) in order to create a more favourable business environment. Traditionally, this attracts mainly multinational corporations and foreign investors, which then develop tourism according to the predominant consumptive model. Without any fixed preconditions, such as binding rules and regulations for tourism development and functioning governance structures to

enforce them, this leads to high leakage rates[2]. These circumstances make it easy for multinational corporations to avoid paying taxes in the destinations bringing little economic benefits for the local populations and governments. In fact, UNWTO should pay special attention, to the issue of tax justice, particularly in international tourism. Tourism businesses have to make their full tax and revenue contributions to enable host country local and national governments to be able to run and provide access to comprehensive public services.

Very correctly, the report demands to limit the structural barriers for Small and Medium Enterprises (SME). SMEs in the tourism sector often have hard times to offer competitive products when multinational corporations dominate the market. SMEs along the tourism supply chain benefit very little as multinationals import a lot of products, adding very little value on the ground. Focussing on SMEs while ignoring the unjust bargaining powers that multinational and larger businesses can use will not bring the necessary change and the urgently needed empowerment of local enterprises.

As long as tourism does not reduce inequalities and contributes to stabilizing destinations politically, economically and strengthens their resilience in terms of other dimensions of sustainability (e.g. heath services, healthy environment), it continues to remove the ground on which it stands.

1.5. Theme 2: Social Inclusiveness, Employment and Poverty Reduction

Poverty
We criticize the fact that the terminology of the report lags behind the much stronger ambitions of the 2030 Agenda. This report only strives towards "poverty reduction", while the agenda envisions to "end poverty in all its forms everywhere" (cf. SDG 1).

Tourism for poverty reduction has been promoted by UNWTO, based on the 'trickle-down theory' – the idea that the economic benefits of the industry would eventually also reach the poor (if not the poorest) sections of society. However, experiences have shown that tourism may not just fail to deliver on the 'trickle-down' promise, but may often even increase poverty due to its inherent inequalities, rather than alleviating it. Across the tourism industry de-regulation and eroding of workers' rights have contributed to joblessness and precarious work and social inequality. The lives and livelihoods of millions of women and men have become more not less precarious. Without serious attempts to empower and increase the capacities of the poor, poorest and marginalised, tourism is not an option for alleviating poverty.

A more suitable framework to measure tourism's performance regarding poverty alleviation needs to include the impacts of tourism on the poor and people at risk of being left behind, whether beneficial or detrimental, by using a comprehensive set of indicators. This would include the impact of tourism on key aspects of human development, such as education, health, and standard of living, as well as on people's vulnerability and resilience, and on the fulfilment of their rights and access to basic services. Such an approach requires micro level assessments. To leave no one behind in the 2030 Agenda, it is critical to systematically collect evidence on whether and how tourism does indeed reach those furthest behind.

---

[2] The report states on P. 9: "The proportion of indirect and induced contributions is relatively lower in least developed countries (LDCs) than in more developed economies, owing to higher amounts of leakage."

Tourism as an industry may increase a country's vulnerability, as the sector is easily affected by disasters, epidemics, terrorism and political and economic crises. The same applies at the micro-level for individuals involved in the sector, e.g. vulnerable groups overly depending on tourism (even with menial jobs). To reduce their vulnerability, there is a need for a diversification of income and livelihoods at all levels. Tourism taken as an additional economic activity and form of income is a more promising option that may also play a role in strengthening resilience at household, community and macro-economic levels.

For more information cf:
- Chapter 1: No Poverty
  Chapter 10: Reduced Inequalities

Tourism and Decent Work
Direct employment in tourism, in theory, has the potential for poverty reduction. The challenge however is to change industry practises that have been going in the opposite direction for decades with the result of an insecure and vulnerable workforce trapped in poverty with little or no chance of social or economic progress. Multinational corporations have avoided and continue to avoid their responsibilities by out-sourcing labour to agencies, which are compelled to outbid competitors for their contracts in a drive to the bottom. The result is that the majority of the workforce is hardly on the minimum wage and way below a living wage.

UNWTO therefore needs to put a strong emphasis on the responsibility for employers to encourage and assist the process of collective bargaining with member led trade unions. Governments and businesses need to be measured against and held to account in order to fulfil decent work standards contained in the various UNWTO, ILO, OECD policies which they have signed up to.
Decent work must include decent living wages. In many tourism destinations and large cities, living costs for locals are relatively high. In London for example, more and more employers outside the tourism sector are paying the London living wage, which is above the government minimum. The hospitality sector has yet to follow their example.

For more information cf:
- Chapter 8: Decent Work
- Comment on the Discussion Paper by Unite the Union, London, Hotel Branch

Sexual exploitation of Children in Travel and Tourism
"Leaving no one behind" is the crucial message in the 2030 Agenda. This demands a strong focus on all vulnerable groups in all SDGs. The protection of children, youth, persons with disabilities, old people, indigenous peoples, refugees, displaced persons and migrants cuts across multiple development goals and priorities. While UNWTO for decades was in the forefront of raising awareness about commercial sexual exploitation of children in travel and tourism and introduced and defended this topic as the main human rights concern in tourism, the discussion paper itself stays quite vague and superficial regarding adequate protection of vulnerable groups, particularly children. Despite the worrisome fact that more and more children become victims of sexual exploitation by travellers and tourists, the discussion paper fails to address this issue all together.

For more information cf. Chapter 16c: Violence Against Children

1.6.   Theme 3: Resource Efficiency, Environmental Protection and Climate Change

We are convinced that minor technical advancement in resource efficiency will not bring about the necessary transformation. Tourism is an extremely resource-consumptive industry, which puts additional pressure on the environment and increases competition for scarce resources. As long as tourism growth outperforms resource efficiency, the net demand for resources and the net production of emissions, pollutants, waste and wastewater will increase and put increasingly dramatic strains on people and planet.

Against this backdrop, the role of tourism as a major CO_2 emitting sector needs to be highlighted. We strongly oppose the liberalisation of air transport suggested in chapter 1.2.2. This is incompatible with the concept of climate justice and leads to further market distortions by creating competitive advantages for unsustainable modes of transport. With the continuous growth of tourism until 2030 and beyond, mere technical advancements in fuel efficiency will not be able to reduce the net emissions of the sector. In order to truly cut back tourism induced emissions, the use of airplanes and the distances travelled need to be reduced.

For more information cf:
- Chapter 13: Climate Action
- Chapter 14: Life Below Water
- Chapter 15: Life on Land

1.7.   Theme 4: Cultural Values, Diversity and Heritage

The discussion paper fails to consider the cultural dimension of sustainable development all together. Culture is presented as an economical asset, while communities are regarded as guardians of nature and/ or culture providing the stage on which tourism takes place. As stressed before, communities and their collective as well as individual rights must be ensured when tourism is developed. Communities must be enabled through FPIC and bottom- up processes to actively shape tourism development, vulnerable groups need to be involved.

To this date, there is a clear vacuum of strategies that protect local communities from falling victims to "over-tourism". Local people must be involved in the constant monitoring of tourisms negative effects and be able to self-determine limits of tourism growth. Fair mechanism for benefits and burden sharing need to be established. Businesses have to be held accountable if they fail to comply, locals must have access to function mechanisms for remedy.

Tourism comes with various challenges for local communities, i.a. with regards to food security. In this regards, we want to draw your attention to the risks described in Chapter 2: Zero Hunger of our online compendium.

The issues of land and resource rights infringements, displacement and evictions as well as gentrification and risks associated with the sharing economy, such as AirBnB in this context, are not addressed at all in this discussion paper. For more information on these issues cf. Chapter 11: Sustainable Cities and Communities.

1.8.   Theme 5: Mutual Understanding of Peace and Security

The discussion paper does not take into account that tourism fuels a lot of conflicts. At local and national levels there is a very significant democratic deficit with respect to participatory planning and consultation on travel and tourism. Planning decisions, which prioritise the interests of large and medium companies at the expense of the majority of citizens and the environment are well documented all over the world. This is linked to the exclusion of citizens and communities from key decisions that affect their lives and livelihoods. Corruption related to planning and infrastructure development and myopia of agreed environmental and health standards' is still, sadly, widespread. If these issues are not addressed, tourism will not contribute to "promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels" as demanded in SDG 16.

For a detailed analysis of risks and potentials for tourism to contribute towards peace and peaceful societies, cf. [Chapter 16b: Peace](#) and [Chapter 16a: Good Governance](#).

1.9.   Governance, Policies and Tools for Sustainable Development

In these regards, we want to reiterate our recommendations stated in the Berlin Declaration on Transforming Tourism:

While the international community has committed itself to the achievement of the 2030 Agenda, we are concerned that shifts in power from public institutions to private sector interests makes transformation an impossible task. The achievement of a fair, just and equal world and the full implementation of the 2030 Agenda depend on political will and a critical review and further development of existing governance processes, business practices as well as the commitment of travellers, media, education and civil society.

So far as the achievement of the 2030 Agenda is concerned, there is still a lack of coherence and adequate governance structure in tourism. While other UN organisations already incorporate mechanisms for the meaningful participation of civil society including complaint and monitoring mechanisms, UNWTO is yet to develop these mechanisms. This year 2017 being the International Year of Sustainable Tourism for Development creates an imperative for an urgent and time-bound review of those structures and the development of such mechanisms (cf. 2. 2. Remarks on governance structure of UNWTO).

We demand that **local, national and international governments**:
- ensure participation by civil society and tourism-affected communities at all levels of planning, decision making, business, destination management, and in monitoring processes. Local communities must benefit from tourism income;
- develop comprehensive coherent monitoring mechanisms with regards to tourism's contribution towards the achievement of the vision of the 2030 Agenda in order to strengthen positive and reduce negative impacts
- implement the mainstreaming of gender equality, community empowerment and human rights-based approaches in tourism policy and development;
- introduce binding regulations on corporate accountability and reporting with robust enforcement mechanisms in line with the UN Guiding Principles on Business and Human Rights;

- abolish subsidies with detrimental effects on the climate leading to market distortions that encourage harmful tourism practices at the expense of more sustainable travel options;
- ensure responsible resource management, which addresses the negative impacts of over-tourism and respects environmental and cultural carrying capacities;
- eliminate structural disadvantages and create an enabling business environment for small and medium scale enterprises as well as community-based initiatives;
- introduce and enforce legislation guaranteeing fair and decent working conditions including living wages;
- ensure tax justice by implementing effective tax regimes with fair mechanisms for distribution;
- facilitate education and life-long learning opportunities that enable career development, enhance personal and professional skills as well as cultural awareness and intercultural understanding.

We expect the **tourism industry** to:
- align management processes with all 17 Sustainable Development Goals and the UN Guiding Principles on Business and Human Rights. Develop due diligence processes and set key performance indicators, monitor them regularly and establish public reporting, that allows for independent evaluation;
- develop and put into practice plans to end sexual exploitation of children in travel and tourism and set up meaningful child protection measures.
- commit to a transparent, fair and accountably managed supply chain including clear and visible pricing policy;
- develop and put into practice plans to reduce the net consumption of resources, such as water and energy as well as net green house gas emissions and waste volumes;
- procure and hire locally in order to help integrate and strengthen local markets;
- enable regular dialogue and exchange with civil society and local communities guaranteeing their access to land and resources;
- consult stakeholders along the supply chain, including workers and guarantee labour rights, including freedom of association;
- invest in research and development to minimize and mitigate the negative impacts of their operation.

We call on tourists to take responsibility for their travel choices by: respecting host communities and their culture; mindfully using scarce local resources; supporting the local economy and ultimately respecting human rights.

We expect the media to independently investigate, critically assess and accurately report on tourism issues.

We call for academic research, teaching and learning programmes that provide an in-depth understanding of tourism issues as they relate to global justice, sustainability and international development.

2. Remarks on governance structure of UNWTO

To merely produce yet another report based on this discussion paper in order to put the vision of the 2030 Agenda into practice is not enough. In our opinion, in the IY2017 it is high time for UNWTO to revise its institutional structure with the aim to increase transparency and accountability to all. Other UN-organizations have long integrated effective mechanisms for meaningful civil society participation and interventions of affected communities; UNWTO has yet to do so in a structural way. Without their meaningful participation, tourism development will continue to be dominated by business interests at the expense of people and planet. We therefore ask UNWTO to present binding action plans on how it will transform its internal structure to become more inclusive, transparent and accountable in line with the core principles of the UN and to allocate the appropriate resources.

With this purpose, we highlight the following concerns and demands:

1. The affiliate programme intends to align private sector initiatives with the UN goals. However, by its affiliate membership structure, UNWTO is dominated by national tourism authorities, multinational hotel chains and tour operators and their respective business interests. Affiliate membership is only open to those who can afford it. Independent civil society organisations and representatives of tourism-affected communities, which can advocate the perspectives and needs of the communities, workers and vulnerable groups within the destinations, are underrepresented amongst affiliate members. Strategies for tourism development designed by affiliate members behind closed doors without effectively involving those "left behind" cannot fulfil the 2030 Agenda's vision. We demand from UNWTO to open the doors for more meaningful civil society participation, ensuring that the voices of particularly vulnerable and marginalized groups will be heard and their rights and needs put before business interests.

   We would like to re-direct your attention to the paper "UNWTO-Civil Society Participation - Why it is time for the UNWTO to open its doors" prepared by Tourism Concern on behalf of Tourism European Network and Ecumenical Coalition on Tourism, in which four existing models how UN agency cooperate with civil society are described, from which UNWTO could draw in seeking to develop its own mechanisms to increase CSO participation in its processes.

2. We demand that UNWTO takes a strong stand for a rights-based approach to tourism in line with the UN Guiding Principles on Business and Human Rights. Instead of arguing for a right to tourism, UNWTO should reiterate its member states' duty to protect the rights of their citizens (in this case the tourism affected communities), its affiliated tourism businesses' responsibility to respect and the victims' rights to remedy. With regards to the latter, we see an urgent need to revise the complaint mechanism anchored in Article 10 of the Global Code of Ethics for Tourism.

   The World Committee on Tourism Ethics (WTCE) and Article 10 generally have the potential to provide an important non-judicial, non-state based mechanism for individuals and communities, whose rights may have been violated by specific parties involved in tourism development, to seek redress. However, the procedures of the WCTE regarding Article 10 lack legitimacy, accountability and transparency. The fact that, from its adoption in 1999 to this date Article 10 has not reported on the application of any case shows that it is not functioning effectively. This

is i.a. due to the lack of awareness of the existence of this mechanism amongst small NGOs outside of the tourism industry due to the exclusive structure of the UNWTO itself. The previous causes for critique, such as the fact, that the disputing parties have to jointly submit their so called "matter" to the WTCE, have not been adjusted.

With the planned conversion of the Global Code of Ethics for Tourism into the Framework Convention on Tourism Ethics, Article 10 is becoming even weaker. According to the draft version this voluntary conciliation mechanism concerning the interpretation or application of the Convention is now included in an optional protocol, which member states can ratify in addition, only if they wish to do so. This is a serious step backwards in the process of the implementation of the Global Code of Ethics for Tourism.

The Transforming Tourism Initiative is supported by the following organisations: