



Sustainable Tourism in Enterprises, Parks and Protected Areas



A DISCUSSION DOCUMENT

Proposals for an Evaluation, Auditing and
Validation Approach of Charter Part II
Partnership Systems

SUSTAINABLE TOURISM IN ENTERPRISES, PARKS AND PROTECTED AREAS

This is a publication from the EU project Sustainable Tourism Enterprises in Parks and Protected Areas (STEPPA) which is funded by the European Union's grant programme: Knowledge networks for the competitiveness and sustainability of European Tourism. STEPPA's main aim is to promote and strengthen the cooperation between the different experiences and certification initiatives for small and micro tourism enterprises working with protected areas. This is done through the sharing, levelling and enhancement of their sustainability practices and criteria, and strengthen their competitiveness through the development of working partnerships between these initiatives and specialized research and support centres for tourism sustainability. The work and research of the project is focused on EUROPARC's European Charter for Sustainable Tourism in Protected Areas.

The project involves ten partners from seven countries: University of Eastern Finland (Finland), Leeds Metropolitan University (UK), EUROPARC Federation (Germany), Consejeria de Medio Ambiente (Andalucia, Spain), Parco Naturale Alpi Marittime (Italy), Parco Naturale Adamello Brenta (Italy), State Nature Conservancy of Slovak Republic (Slovak Republic), Latvian Country Holidays (Latvia), Nationalparkverwaltung Harz (Germany), and CoaST (UK).

This discussion document was composed by Dr. Fernando Correia and Dr Xavier Font of the International Centre for Responsible Tourism at Leeds Metropolitan University (UK) with the input of other project partners

Cover Photo: Forest of Bowland Charter Partners

Picture: Forest of Bowland Area of Outstanding Natural Beauty

Design: EUROPARC Federation, Dea Mijakovac





Contents

Introduction	4
Objectives of this document:	5
A. BACKGROUND INFORMATION	6
Objectives of STEPPA	6
Project Partners:	7
CP2: Summary of validation and implementation process.....	8
B. CHALLENGES FROM THE CURRENT CP2 VALIDATION SYSTEM	10
C. EVALUATION OF CP2 OBJECTIVES AND SUSTAINABILITY CRITERIA	12
CP2 Key Objectives.....	12
Key Objective 1: Partnership Strengthening.....	13
Key Objective 2: Differentiate Charter Partners as sustainable tourism businesses	14
Common Sustainability Standards for Tourism Businesses	15
Quality and sustainability of the business certification and support system	16
Summary	24
D. SYSTEMS AND PROCESSES FOR CP2 VALIDATION	27
The process of auditing compliance.....	27
Guidance notes for a CP2 auditor	28
CP2 Key Objective 1: Partnership Strengthening	28
CP2 Key Objective 2: Differentiate Charter Partners as sustainable tourism businesses	29



Introduction

Section II of the European Charter (henceforth referred to as **CP2**) is a Pan-European umbrella approach aimed at promoting and certifying working partnerships between Charter Protected Areas (PAs) and local tourism businesses (Charter Partners). As an international umbrella approach, CP2 needs to cover and take into account a wide range of local, regional and international contexts and specificities. This includes a consideration for already existing business sustainability certification approaches being used or under development, either created by individual PAs, the Charter community, or third-party schemes being used in current Charter Partnership Agreements. However, this also provides a challenge to EUROPARC that has to validate as equivalent potentially quite different business certification approaches.

The main goal of the STEPPA project is “to **promote and strengthen the cooperation** between the different experiences and certification initiatives for small and micro tourism enterprises working with (Charter) protected areas (PAs), through the sharing, levelling and **enhancement of their sustainability practices and criteria**, and **strengthen their competitiveness** through the development of working partnerships between these initiatives and specialized research and support centres for tourism sustainability.”¹

One of its key objectives is the sharing of experiences and comparison of sustainability standards being used or developed by STEPPA partners and the enlarged Charter community, and promote a discussion about the harmonization of working and sustainability criteria used on CP2 systems across Europe.

After the start of the of the STEPPA project, a EUROPARC Sustainable Tourism Working Group (STWG) was created as a “temporary, operational, professional, representative and participatory solution in order to assist EUROPARC in the further development of the several aspects of the Charter (methodology, templates, communication, training, monitoring, etc) as well as with the interaction with the other WGs and new developments that the Sustainable Tourism can assume in the future”². Amongst its aims are: “developing, evaluating and piloting the methodology of the European Charter for Sustainable Tourism in Protected Areas, especially in Charter Part 1 and 2;” and to promote the “active connection and co-ordination with other Pan European Projects like STEPPA”.

The STEPPA project welcomes the creation of the STWG, and looks forward for the development of synergies between both initiatives. Given the existence of this new body and its aims, it only makes sense that the outputs of STEPPA - including this report – are used to inform the discussions and goals of STWG on the further development of the Charter.

We hope that the proposals included in this report enrich these discussions and actively contribute for the advancement of the sustainability goals and future quality of the Charter.

¹ From the original bid.

² From the STWG “First Draft Workplan”

Objectives of this document:

Based on the knowledge and experience of the research partners of STEPPA in sustainable tourism certification, this discussion document has the following objectives:

- To propose a methodology to EUROPARC that can be used to evaluate CP2 proposals from PAs, Sections or others, whilst ensuring commonality of sustainability criteria and processes;
- Specifically in relation to the certification of businesses' sustainability practices included in CP2 systems (created "in-house" or by third-parties), to propose a system that provides assurance and evidence to EUROPARC that these are backed by appropriate governance and management systems that:
 - Guarantee their long term sustainability and viability;
 - Provide confidence to the parties involved (including business partners) over the quality and institutional support of the process;
 - Ensures commonality of basic conditions and criteria across all European CP2 initiatives;
 - Protect EUROPARC and the Charter brand from incorrect use and association with certification schemes that do not follow the essential principles of sustainability and quality of the European Charter.
- To advance initial proposals regarding systems and processes for the auditing and validation of CP2 methodologies
- To provide general verification guidelines for a future CP2 auditing process

Proposed timeline for discussion and feedback:

End May	Discussion document completed by Xavier Font for discussion at the First STWG meeting in Catalonia on 24/05/11. (CR)
Mid June	Feedback from STWG
End June	Revised document and process presented in CharterNet meeting, Serbia (XF)
July	Document and proposals presented for feedback at CP1 verifiers training, Germany (CR)
September	Finalised document proposal presented in Annual Conference, Germany (CR), as output of the STEPPA project, for discussion in a Charter working group at the conference
October	Presentation at project closure meeting, Savolinna, Finland (XF/CR)



A. BACKGROUND INFORMATION

STEPPA's Funding Programme:

Knowledge Networks for the competitiveness and sustainability of European tourism.

DG Enterprise and Industry, European Commission ENT/CIP/09/B/N06S00

Objectives of STEPPA

Overall objective³:

To **promote and strengthen the cooperation** between the different experiences and certification initiatives for small and micro tourism enterprises working with (Charter) protected areas (PAs), through the sharing, levelling and **enhancement of their sustainability practices and criteria**, and **strengthen their competitiveness** through the development of working partnerships between these initiatives and specialized research and support centres for tourism sustainability.

Specific objectives:

- Sharing of experiences and comparison of sustainability standards being used or developed with businesses partners of (Charter) PAs, and promoting the harmonization of working and sustainability criteria across Europe.
- Development of a sustainability learning network between Charter Areas, their business partners and tourism research centres for demonstration of links between promotion of sustainable practices, increased competitiveness and growth in conservation awareness and support.
- Development and piloting of a set of research tools for the identification of key trends and determinant factors in sustainable tourism on Charter protected areas, visitors' values and perceptions, market trends, and local businesses' financial and strategic gains from implementing sustainable management approaches and partnering with protected areas.
- Promoting capacity building of business owners and protected areas' managers on sustainable tourism approaches, criteria and evaluation.
- Disseminate best practices at multi-scales, from business networks at protected area level to regional, national and European networks of businesses, parks and public-private Charter forums working with the Charter.
- Create permanent online networking platform including sustainable tourism best practices and research tools for European protected areas, available to parks, small and micro businesses, specialist tour operators and other interested parties.

³ As submitted in bid.



Project Partners:

- In Spain: “*Consejería de Medio Ambiente*”, representing the Spanish “Charter Part II” methodology. Currently 55 businesses certified as Charter Partners, but expected 120 by December 2009.
- In Germany: Harz National Park, representing the German PARTNER scheme. PARTNER is a EUROPARC-Germany initiative for the establishment of formal cooperation schemes between protected areas’ administration and tourism businesses, promoting quality and environmental management in associated enterprises, and is being piloted to correspond to the Charter Part II methodology for Germany. Harz has currently 30 PARTNER businesses.
- In UK: CoaST - Cornwall Sustainable Tourism Project, representing Cornwall AONB (Area of Outstanding Natural Beauty) and the UK’s Charter Part II methodology. In the UK, most Charter PAs have adopted the Green Tourism Business Scheme (a third-party business certification ecolabel) as PA criteria for its Charter Partners.
- In Italy: “Parco Naturale Alpi Marittime” and “Parco Naturale Adamello Brenta”, representing the Italian Charter Part II methodology. The “Parco Naturale Adamello Brenta” created the *Qualità Parco* (“Quality Park”) a local environmental/marketing certification to promote environmental quality with its local businesses, and aims to integrate this in its Charter Part II approach.
- In Latvia: Latvian Country Holidays association, working with Kemerī National Park, currently aiming at Charter certification. LCH has 300 business members and is running the “Green Certificate” ecolabelling scheme for rural tourism accommodations since 2004, under supervision of the Ministry of Environment.
- In Europe: EUROPARC Federation, representing the European network of Charter Protected Areas and certified Charter Partners partners.
- Research partners: Centre for Tourism Studies of the University of Eastern Finland, and the International Centre for Responsible Tourism of Leeds Metropolitan University.



CP2: Summary of validation and implementation process

Process of CP2 validation at European level

1. A network of Charter PAs' (of regional, national or EUROPARC Section level) develops and submits to EUROPARC a proposal for its CP2 system. This network becomes the CP2 system "guarantor".
2. EUROPARC validates the compliance of the proposal with the official text of the Charter Part II and submits it to the Charter Evaluation Committee for formal approval;
3. EUROPARC communicates the decision of the Committee to the PA and/or its network;
4. The Charter PA starts implementing the methodology in its territory. The Charter PA takes the responsibility to communicate to the Sections/National and/or Regional Networks and to EUROPARC every semester a list of its new Charter Partners (i.e. certified businesses), with relevant data for information tracking, marketing, networking and communications.

Exception: when an individual Charter PA wants to implement a CP2 approach but no network methodology exists for its given territory, it can:

- a) present its own methodology for validation;
- b) propose to use a previously validated methodology from another regional national Charter network; or
- c) decide to work with its network (Regional, National or Section Level) in order to prepare a common network methodology to be presented to EUROPARC for validation.

(N.B.: EUROPARC encourages the use of methodologies developed and agreed at Section or national network level first, but it realises that this may not always be possible, particularly in the early stages of implementation.)

Process of CP2 implementation at PA level

At a local level, and between the Charter PA and the candidate partner businesses, the CP2 process involves the following steps:

- a. Definition of a **European Charter Partnership Programme**, as a mutual commitment between the protected area authority and individual businesses. This is a flexible partnership approach and negotiated process between both parties defining their cooperation model, requirements from each side, consideration of differing local needs, analysis and agreement of the compatibility of tourism products and services with the PA's objectives, diagnosis by the respective business on all its activity, etc (see Section II full text for more information).
- b. Signing of a **European Charter Partnership Agreement** between the PA and local business. This identifies both the PA and business commitments as well as setting out actions and monitoring indicators. Both sides should fulfil the requirements set at European level and protected area level:



- *European level requirements* - listed in Section II official text.
 - *Requirements at PA level* - agreed by each protected area's Sustainable Tourism Forum. These include commitments from the PA to businesses and from businesses to the PA (some examples are provided in Section II official text)
 - It is at PA level requirements that the parties establish what is the format, level and type of environmental and social commitments required from business partners. The way for businesses to demonstrate these can be through a quality scheme owned by the PA or Network, or through existing third-party certification schemes. The requirement for businesses to use a specific third party and independent quality mark or certification scheme should be clearly stated in the regional/national CP2 proposal submitted to EUROPARC for validation.
- c. By signing the Partnership Agreement the business becomes a recognized European **Charter Partner**, and is committed with an individual Action Plan for three years. The business will also receive a **European Charter Partnership Certificate** for display in its facilities, listing the key commitments assumed by both the business and PA.
- d. The Charter PA communicates to the Sections/National and/or Regional Networks and to EUROPARC every semester its new Charter Partners with relevant data in order to supply the Network with information for marketing and promotion.



B. CHALLENGES FROM THE CURRENT CP2 VALIDATION SYSTEM

In May 2007 the EUROPARC Council approved the revised official text of Section II of the Charter, establishing how tourism businesses can gain accreditation with the Charter, and setting up a common framework at the European level which the protected areas are required to comply with. In the same occasion, a separate document was approved setting the initial procedures for validation of Charter Part II methodologies by EUROPARC – title and first paragraph below:

“PART II OF THE EUROPEAN CHARTER FOR SUSTAINABLE TOURISM IN PROTECTED AREA: PROCEDURES AND TIMETABLE FOR VALIDATION OF THE CHARTER PROTECTED AREAS’ METHODOLOGY BY EUROPARC

As stated under point 8. of the official text of the Part II of the European Charter for Sustainable Tourism in Protected Areas, EUROPARC will validate the Charter protected areas’ methodologies for implementing the Charter Part II. This ensures the required commonality in implementation across Europe, as well as compliance with the principles of Part II of the European Charter. The validation will be done in partnership with EUROPARC Sections and national or regional Charter networks where appropriate.”

Possibly because it was the first document or attempt to address the issue of validation, at the time no concrete guidelines were included on how EUROPARC could ensure “the required commonality in implementation across Europe”. However, with the submission of the first CP2 proposals for validation also the first questions started to appear about what criteria should EUROPARC use to evaluate them against. Also, through the meetings, debates and comparison of experiences of the STEPPA partners, the issues around of commonality of implementation versus diversity of approaches and contexts , and how can these be reflected in a validation process, generated equally a series of questions. These can be divided into two groups:

Questions around commonality of criteria and objectives, like:

1. What are the different CP2 systems seeking to do? Are their objectives aligned across Europe? What should a CP2 system ideally measure or monitor? And what type of guidelines should EUROPARC provide?
2. Apart from the partnership element with the park, when looking at the sustainable practices of a business what type of criteria should be considered and which ones should be included as minimum common denominators across all CP2 systems in Europe?
3. How to integrate already existing business certification schemes (third-party or not) in a CP2 methodology? For instance, in the case of the STEPPA Partners, how to best integrate the German PARTNER scheme, the British GTBS, the Andalucian “Marca Parque Natural” or Adamello-Brenta’s “Qualita Parco” in their national CP2 systems?
4. When parks or sections opt for third-party business certification schemes, how to guarantee that they provide at least similar levels of criteria and evaluation as the other approved CP2 systems?

5. How can EUROPARC determine, provide guidance and/or feel confident to validate on what are good business sustainability criteria?

Questions around systems and processes, like:

6. How do CP2 systems decide what needs to be measured?
7. What guidelines should be provided to EUROPARC sections managing current or futures systems, regarding CP2 management and implementation?
8. What system of verification should exist to verify and validate compliance of a CP2 system with some common EUROPARC criteria or guidelines? Should there be a similar verification system (or in the same line) to the one of Charter Part I? How should one relate with the other?
9. What guidelines or recommendations should be provided to the Evaluation Committee and EUROPARC Council to help them critically assess, compare, evaluate and/or approve different CP2 methodologies?
10. What systems of verification exist (or should exist) at the national/regional/section and protected area levels?
11. Should EUROPARC have a system that goes beyond validation of CP2, but also monitors national CP2 systems? (e.g. a Charter audit from whole CP2 methodologies to individual parks and businesses)
12. How can EUROPARC develop a system that both verifies that CP2 methodologies are fit for purpose, and also that those verifying and evaluating them are competent to do so? What competencies should they have?
13. Should certification of sustainability criteria of individual businesses preferably be done by independent third-party certification schemes when these exist (like it happens in the UK with GTBS, for instance)? What are the advantages and disadvantages of this approach, and what kind of recommendations should EUROPARC provide in this?
14. How to safeguard the EUROPARC and Charter brands in a context of multiple CP2 systems and hundreds of certified businesses?

These are the type of questions that have guided the discussion in this document. The next sections will provide information on current best practices from sustainable tourism certification that can guide EUROPARC and STWG in developing their own answers for those. Section C will focus on the first group of questions and provides guidelines and proposals that can ensure a commonality of business sustainability standards and support processes across CP2 systems. Section D will provide some initial directions to address the second group of questions. Since these issues are directly related with EUROPARC's own governance systems, they are out of the remit of STEPPA's original objectives. However, we provide some recommendations and suggestions, based on work being developed by ICRT on auditing and accreditation of sustainability certification schemes in Europe, and include guidance notes of what auditors of such schemes should look for.



C. EVALUATION OF CP2 OBJECTIVES AND SUSTAINABILITY CRITERIA

CP2 Key Objectives

As it is stated in its official base document, the main aim of Section II of the Charter is “to strengthen the links and deepen understanding between protected area managers and their partners in the business community.”⁴ A CP2 system (or Partnership Accreditation System) should then have as main objectives the operationalization and creation of conditions for that aim to be achieved. The official texts of the Spanish and Italian CP2 systems define these objectives with added clarity in the following statement:

“SYSTEM OBJECTIVES⁵

- Encourage close **collaboration** between the managers of ECST-accredited protected areas and tourism businesses, based on solid mutual **commitments** to progress towards more sustainable tourism.
- **Differentiate tourism businesses** in terms of their voluntary commitment to the sustainable tourism development of the protected area where they operate, assisting them from all of the public administrations involved, in the task of continuously improving the sustainability of their businesses.”

These objectives are in line with the Charter’s philosophy of being a *process* for sustainable development, for their focus and emphasis on relationships, collaboration, continuous improvement, mutual voluntary commitments, and business support and assistance.

⁴ From the official text of Section II, version May 2007.

⁵ Copied from the official text of the Italian CP2 system. “Bold” words as in original.



Key Objective 1: Partnership Strengthening

The mechanisms and systems set in the official text of Section II should guarantee that these objectives are pursued – i.e. definition of a European Charter Partnership Programme between the PA authority and individual businesses setting commitments from both sides; signing of a European Charter Partnership Agreement; and validating this through a European Charter Partnership Certificate for public display and recognition.

These agreements are inevitably contextual, and different CP2 systems may include different provisions according to different national or regional institutional frameworks of others. Equally, at national level the principle of subsidiarity applies and different protected areas might adapt their national CP2 systems to fit their particular characteristics.

Nevertheless, although the partnerships mechanisms above provide a level of reassurance that CP2 objectives are pursued, they don't provide directions into demonstrating how are these achieved, nor how can they be commonly demonstrated across sites and systems (despite subsidiarity).

Proposal (for discussion by STWG):

CP2 systems submitted for validation should be explicit and demonstrate how will Partnership Programmes under their umbrella be maintained and monitored through time. Process criteria and indicators should be suggested, for instance:

- Number and/or periodicity of meetings with the business throughout the year
- Number of Forum meetings the business attends
- Training provided and attended
- Level of one-to-one support a business will get
- Resources that the PAs should provide (or secure from other sources) to maintain the Partnerships at local level
- Business satisfaction studies
- Etc.



Key Objective 2: Differentiate Charter Partners as sustainable tourism businesses

The second CP2 system objective listed above focuses specifically on the tourism businesses and their differentiation in terms of voluntary commitment to sustainability. All CP2 systems currently approved or under development include a strong component addressed at supporting a business moving up the sustainability ladder, improving practices, implementing environmental management systems, etc. This is also one of the areas where more diversity is expected between CP2 systems, given the different contexts, different understandings, and different tools and institutional levels of support available to businesses and PA authorities between countries and regions.

Some CP2 systems created (or will create) their own list of standards and criteria to assess business sustainability practices, like it happened with the Spanish CP2 system. Others have opted (or will opt) to incorporate already existing business certification tools to address the monitoring of these issues (and avoid the administrative burden and costs involved), like it happened in the UK with the adoption of the Green Tourism Business Scheme as preferred method of assessment.

The adoption of third-party certification systems by candidate Charter Partners is accepted (and expected) by the official text of Section II of the Charter, as one of the specific requirements at PA level that can be included in the business&PA Charter Partnership Agreement. The practice is common also amongst STEPPA partners. Harz National Park expects its Charter Partners to adopt the German PARTNER scheme. Parco Naturale Adamello Brenta expects its Charter Partners to adopt the “Club Qualita Parco” system. The Spanish CP2 system includes provisions for accepting other regional systems, like the Marca Parque Natural de Andalucía, but also quality or environmental management systems like ISO 9.001, ISO 14.001 or EMAS.

This diversity of approaches causes two main problems in terms of validation of CP2 systems by EUROPARC:

1. How to guarantee that businesses certified as Charter Partners are following common minimum standards and criteria across Europe? (or at least “travelling in the same direction”?)
2. How to guarantee that validated CP2 systems provide adequate levels of quality support in terms of business sustainability practices – be they provided by the PAs or by third-parties? And what should be the minimum common levels for these systems to be considered adequate?

The following sections will address these two questions, providing proposals to address these issues based on the experience of ICRT in accrediting sustainable tourism business certification schemes in Europe, and its analysis of the typical weaknesses of audited programmes.



Common Sustainability Standards for Tourism Businesses

1. The contents of the standard.

All CP2 programmes should review their business sustainability criteria to make them relevant to the current understanding of sustainability, while keeping the links with conservation and PA's objectives. Too many labels tend to focus on few tangible aspects of environmental management that help to save money (energy management, water management and also waste/recycling). When contribution to climate change is included this tends to be implicit as part of energy management, not as a goal in itself. It is particularly worrying that in labels applying to businesses in national parks, positive contribution to protection of species and biodiversity in particular are not included. More up to date labels will include criteria on contribution to climate change. While customer education/information is often included, all too often this is not very meaningful. Staff training is also common but needs emphasising. All too often the only aspect of socio-economic sustainability is to ask for the purchase of few local products, yet sustainable sourcing is much more than buying these to include understanding the impact of all our substantial purchases. Equally socio-economic sustainability in protected areas should include employment policies that contribute to the quality of life of the local population in and around the park, by creating jobs for groups in the community that will often find it hard to find employment elsewhere (women and young people in particular, but also groups with disabilities, learning difficulties or other challenges to enter paid employment).

Proposal:

Since the creation of the Charter more than a decade ago, the global understanding of sustainable tourism has progressed enormously, as will no doubt continue to. What was at the time a progressive proposal (i.e. the certification of business sustainable practices) has seen since a multiplication into a wealth of similar initiatives and accumulated experiences across the globe. In order to bring some coherence and commonality to this diversity of approaches, in 2007 the Rainforest Alliance, the United Nations Environment Programme (UNEP), the United Nations Foundation, and the United Nations World Tourism Organization (UNWTO) launched an initiative to create a set of common sustainable tourism criteria through a process of extended and open worldwide consultation. In 2008, the Global Sustainable Tourism Criteria (GSTC) were launched at the World Conservation Congress: "a set of 37 voluntary standards representing the minimum that any tourism business should aspire to reach in order to protect and sustain the world's natural and cultural resources while ensuring tourism meets its potential as a tool for poverty alleviation." (www.sustainabletourismcriteria.org)

Given the aims of GSTC, the history or their development and strong input of the conservation sector (members included Conservation International, Rainforest Alliance and IUCN, amongst others), **we recommend that EUROPARC uses the GSTC as the basis to inform, assess and validate business certification approaches included in CP2 systems.**

GSTC are organized around four main themes: effective sustainability planning; maximizing social and economic benefits for the local community; enhancing cultural heritage; and reducing negative impacts to the environment. The list of all criteria is freely available online (www.sustainabletourismcriteria.org), as is an extended battery of suggested indicators for each criteria.



We are not recommending that CP2 business certification schemes should address all of the 37 standards of GSTC. The list was created for worldwide use and some of the questions might not apply necessarily in Europe or particular parks' contexts. However, **we recommend that CP2 systems submitted for validation by EUROPARC should include a discussion on how its proposed business certification scheme addresses the GSTC minimum standards**, in what way, what criteria were not considered and why, etc. It is important that the bodies developing and proposing CP2 systems make a serious reflection on how their proposed systems compared with the currently most up-to-date and globally agreed tourism sustainability criteria. Likewise, as owner and promoter of the Charter, it is equally important that EUROPARC guides current and future CP2 proponents towards these best practices.

2. Regular revision of the standard criteria.

Certification programmes need to plan regular improvement periods- the criteria and the processes of certification cannot be left without review for years. Many certification programmes will not include carbon management/contribution to climate change, and most labels do not include socio-economic criteria such as creation of quality jobs for local people or for disadvantaged communities, the result of an environmental legacy from the 1990s. It is necessary to set systems in place to conduct periodic reviews of the certification process and criteria, paying attention to changes in societal expectations, legislation, sustainability knowledge, increased opportunities to manage impacts and regional or global processes to set up tourism sustainability criteria and standards.

Proposal

EUROPARC should require from current and future applicant CP2 systems the condition to include a regular revision of business sustainability standards and criteria every 3 years. If reviews only occur every 5 years, the changes can be much more substantial as will be the challenge of getting previous awarded companies to improve their standards. The certification body shall give notice of changes to certification requirements, take account of views before deciding on the detail of the change, publish the change, notify companies certified previously and verify that these make the necessary adjustments in a reasonable timeframe.

Quality and sustainability of the business certification and support system

The issues covered below from points 3 to 4 are particularly relevant when PAs or CP2 systems are choosing third-party businesses certification systems to introduce as a specific requirement for business/parks Charter Partnership Agreements , but can apply equally when they are considering developing their own system (at a Section/Regional or National level).

These criteria aim to provide reassurance to all parties involved (from Charter Partners to EUROPARC as validating body) that the systems selected to certify and support business practices have high quality standards, provide adequate levels of support, offer guarantee of long-term sustainability.



3. Quality assurance.

3.1. Organisation.

This is a generic criteria that provides a certification body the opportunity to prove that they are well organised and have the legitimacy to operate- who is behind them and what's their legitimacy to operate, how do they work as an organisation and make sure that tasks get well done.

The certification body shall foster confidence, by being impartial, responsible for decision-making and identifying responsibility for key processes such as testing, inspection, evaluation, formulation of policy matters and others. The certification body shall have systems to ensure impartiality of decision-making and evaluation, arrangements to cover liabilities as well as financial stability, employ qualified and sufficient personnel, have a quality system that gives confidence in its ability to operate, and systems to differentiate between certification and other activities

3.2. Legislation compliance.

In most certification systems at present compliance with the legislation is assumed and not checked against and there is the assumption that applicants and award holders would be aware of tourism, environmental legislation or other legislation, or know how to interpret it. CP2 systems should prepare a list of relevant legislation that is generic and kept up to date for all businesses, best online, and a quick checklist of typical failures. Training for staff on what these typical shortcomings are and how they can be spotted through a site visit is also necessary.

3.3. Quality system.

The certification body shall have a quality policy appropriate to the type, range and volume of work performed, ensures it is understood, implemented and documented in a quality manual and associated quality procedures. Amongst other aspects the quality system will assure that all applications are processed promptly and that businesses receive adequate opportunities for progression.

Not all certification bodies will need the same level of detailed procedures, it is important that they are appropriate to the size of the organisation. This is the opportunity for the certification body to explain how they operate and how it is appropriate. The quality system will allow the certification body to find data on the applicants and certified companies easily, such as how many applicants were new to the programme in a certain year, how many left the programme and information on why they left, how many continued, what are the different levels of performance, what information is being sent to companies (in the form of newsletters), where are records on the latest inspections of those companies kept and what were the findings... It is important that companies that want to be certified are not kept for a long time waiting- programmes should not allow companies to be awaiting grading for over 6 months, and only under exceptional circumstances beyond the certification body's control for up to 12 months.

3.4. Validity of certification.

There will be an agreed period of validity for the certification, usually no more than three years. Programmes that under exceptional circumstances do not conduct on site inspections at least every



second year as requirement for renewal of certification must have solid alternative methods for monitoring in place.

The knowledge and practice on sustainable tourism changes fast, and it is important that companies are encouraged to improve their practices regularly. For this reason marking a period of validity of the certification is necessary. Most certification programmes will have annual inspections of the companies that are certified, but increasing financial pressures means more programmes do it every second year. In those very rare circumstances that programmes do not conduct on site inspections at least every second year as requirement for renewal of certification, it is essential that there are solid alternative methods for monitoring in place. Solid methods could include very detailed reports that the certified company has to complete, explaining their current management practices and performance. These reports would need to be backed up with evidence (for example receipts, invoices, photography, survey results...).

3.5. Appeals, complaints and disputes.

The certification body shall keep a record of appeals, complaints and disputes take appropriate action and document this action within an appropriate and predefined time period.

Certification bodies should have a publicly available process inviting complaints and explaining how these will be handled. They should then keep electronic lists of appeals, complaints and disputes, and be able to demonstrate how they justify that the action that has been taken was both timely and appropriate. At a minimum written correspondence should be made with an appellant within a period of 3 weeks from receipt of any complaint.

3.6. Avoidance of conflict of interest.

To ensure credibility, the certification programme must not have undue influence which would demonstrably represent a conflict of interest.

The certification body and its staff will make public any relations they have with other organisations that might affect their independence. Funding, in kind support or participation of tourist boards and other public bodies should be disclosed. Ownership of tourism companies either by staff or by staff's relatives should be recorded. Vested interests from the certification programme to pass borderline companies (or to not drop previously attained awards) will be closely monitored during the validation process.

Proposal

EUROPARC should also ask from current and future applicant CP2 systems to report how their proposed business certification systems (third-party or internally developed) address each of the headings above and how are these verified.

4. Quality of assessment.

4.1. Certification body personnel.

There is evidence from previous audited schemes of inconsistent practices in how assessors conduct their job in certification schemes. Every certification programme must make sure that assessor ratings are fair, and not overly generous, particularly for social sustainability aspects, avoiding giving inflated scores. More consistency in the scoring system is necessary, making sure that assessors spot inconsistencies and do not accept explanations at face value. Most businesses to be certified can take many more sustainability actions with very short payback periods; we are not suggesting major investments in the current economic climate. Also there are many missed opportunities to use engaging in certification to create better visitor experiences and raise quality at the businesses, with good return on investments. This does not have to alienate certification applicants.

In every certification programme assessor training is necessary, to raise assessor confidence, knowledge and quality of feedback. The certification programmes expect often either environmental engineers or conservation advisors to be sustainability auditors. Assessors need training to increase their knowledge and confidence in the full range of what is understood as sustainability today. The certification programme therefore needs to collect CVs for all assessors and ask them to specify their knowledge and experience against the full range of criteria for the certification programme, in particular any newly added sustainability criteria. For the assessors who do not have the necessary knowledge, training needs to be provided. It is expected that training will be needed on audit techniques as well as the content of some of the criteria (usually the social and human resource management criteria). This can include a combination of peer reviews/shadowing, mentoring, reading key documents, participating in accredited trainings, engaging with government initiatives, and taking further qualifications on environmental or social auditing.

In summary, in CP2 systems it is necessary to ensure all business auditing staff are qualified as environmental or social sustainability auditors, and have qualifications ensuring their capability to conduct environmental audits. The certification body must have qualifications of both staff and subcontracted personnel as part of the credibility and quality assurance of the system. It is also necessary to develop in house expertise in social and economic sustainability and related criteria, standards and auditing processes. Where personnel have qualifications for only part of the standard (i.e. ecology/biodiversity, environmental auditing, or socio-economic), the certification body will ensure that additional training has been undertaken to be able to audit the full range of the programme's criteria.

4.2. Qualification criteria.

Personnel will sign a contract committing to comply with rules defined by the certification body, and declare association present or past with companies that they might have to certify including having provided advice to them or having personal knowledge of staff in that company. The certification body will have information on qualifications, training and experience needed for the job and those of staff employed.



4.3. *Independence of functions.*

Assessment and technical assistance functions will be kept independent. As a minimum, different staff within the certification body will conduct the technical and assessment functions.

Greater ownership by applicants of the process of application and monitoring is needed. While we raise the issue of increased technical assistance, it is necessary to have separate advice from auditing functions, to ensure impartiality, credibility and conflicts of interest. We observe typically that high levels of support and handholding for applicants are neither desirable nor sustainable. Applicants arguably develop a dependency on the project officer and team that does not allow them to take full ownership of the process. It is necessary to develop appropriate self help materials to allow tourism companies to meet the certification body's standards without the reliance on external support. It is unacceptable that the certification body's project officer or advisor fills in the application form for the applicant. This undermines the process of independent application and assessment and creates a reliance on the certification body's team that cannot be supported in the long term. Outsourcing assessment is usually the most independent option, with systems to show how decision-making is independently conducted, and monitoring for renewal must help to continuously raise standards.

4.4. *Subcontracting.*

Subcontracting assessments will be the basis of a documented agreement including confidentiality and conflict of interest clauses. The certification body shall take full responsibility for subcontracted work and ensure competency of subcontractors.

Subcontracting the assessment of companies is appropriate, particularly when the officers of the certification body are conducting extensive technical assistance. However in too many instances certification bodies do not have any way of checking the quality of the assessments, which after all have been conducted by their appointment. It is the responsibility of the certification body to make sure that all activities of the subcontracting body are conducted in the most professional way. There is evidence of tourism assessments being conducted by the more junior environmental auditors (because there's less environmental risk than when auditing say factories or hospitals), and these auditors having limited knowledge of the tourism industry that can actually be of help to the certified businesses. There's the need for consistency in data collection and making sure that the assessment reports are of use both to the certification body to collect data, and for the companies to learn.

Proposal

EUROPARC should also ask from current and future applicant CP2 systems to report how their proposed business certification systems (third-party or internally developed) address each of the headings above and how are these verified.



5. Value of certification.

5.1. *Performance to meet the standard.*

The certification body should justify the level of performance needed to meet the standard. Measurable criteria should be set at attainable level that makes the programme inclusive yet they need to also encourage best practice and make the achievement of certification a sign of quality.

The certification body will be able to prove why a certain level of performance is required to meet the standard, and how to link this to the way the evidence is collected through field assessments and other data collection methods. The importance here is to make sure the certification cannot be criticised for being too soft by asking for too little from companies, or too hard and excluding companies that want to use the certification as a learning process.

5.2. *Meaningful label.*

For any certification programme to be taken seriously as a label, and to pre-empt further funders' questions on its worth, data should be collected to show significant difference in environmental (and arguably socio-economic) performance between certified and non certified firms. The emphasis here is in providing evidence that certified companies are substantially better in both sustainability management and performance than non certified businesses. The certification body should collect evidence, wherever possible quantifiable, to show that difference- this could be showing the improvements made year on year by these companies (e.g. certified companies have reduced their energy consumption per guest night by 20% since joining the certification programme) or comparing the certified companies against the average (e.g. certified companies purchase on average 20% more local produce from biological suppliers than non certified companies). If necessary the certification programme will need to change the way that data is collected about the firms, or implement benchmarking systems or case study approaches to show how certified firms perform better than average. If case studies are used, these should be representative of the full range of firms certified, not using the highest performing firms as if typical. Businesses should be transparent to stakeholders and customers in particular about the actions they have undertaken to achieve certification.

Proposal

EUROPARC should also ask from current and future applicant CP2 systems to report how their proposed business certification systems (third-party or internally developed) address each of the headings above and how are these verified.



6. Benefits to certified businesses.

6.1. *Technical assistance.*

Technical assistance is one of the main reasons why tourism companies will apply for certification, particularly for small firms. Yet it is understood that the provision of technical assistance by a certification body is usually seen as a conflict of interest. In the context of the Charter though, and in particular of a CP2 system strongly based in collaboration and mutual support, this validation process will expect more technical assistance to be provided that is typically expected of certification bodies. Therefore the certification programme has to prove that the technical assistance provided or available is appropriate to the needs of their applicants and awardees, and that where direct technical assistance is provided, this does not conflict with the function of independently auditing performance.

Most certification programmes should provide better self support materials to allow tourism companies to meet the certification standards without the reliance on external support. Small tourism companies need more applied support- the systems only make sense as a means to an end, which are the environmental performance, support to the Charter tourism strategy, and the PA. Giving a whole list of criteria to act on is usually daunting. Advice on which are the easier criteria to start with, where to start, what is the best return on investment will all help. Support in explaining to companies which criteria will help them save money (energy and water management typically) and how to use these savings to create a sustainability budget to implement other actions will be a starting point. Advice pre assessment and between assessments should focus on the management systems and the need for monitoring, as well as the range of possible actions- emphasising payback periods and market appeal. Reassessments alone aren't insufficient to help companies continue improving, and interim processes to encourage companies to take ownership over their improvement plans and report on these are necessary. After the thorough upfront investment in getting companies through the initial stages, the withdrawal of such help after being awarded can lead to stagnation- it is important that new systems are put in place to encourage ownership of the process of reporting results, and of achieving further results. The individual Charter Forums should have a significant role in these business support functions, and mechanisms to demonstrate how such support will happen should be demonstrated.

6.2. *Marketing and communication.*

Certification programmes should use their label extensively to raise awareness and knowledge around environmental and conservation issues, and to educate the consumer (visitor/ guest etc). The certification programme must contribute to the marketing dimension of the applicants. The certification programme must both provide marketing advantages, and provide advice on how to use their sustainability credentials for marketing purposes.

It is necessary to assess the range of possibilities to encourage customer facing activities and communications that promote sustainable holiday taking - as well as positioning the PAs the certification programme represents in the right markets. For this to effectively take place, several changes need to take place on how the certification program sees itself- from currently a resource based management tool, to a market led tool. The tourist and the PA need to be at the centre of the certification message, with a joint clear purpose: how will the tourist enjoy their holiday better



because they consume in a certified business, and how will the PA benefit from it? Without a very clear market led message the appeal of the sustainability certification to businesses is limited and the use in marketing terms will always be under-funded as stakeholders will only see a limited appeal in the system.

Proposal

EUROPARC should also ask from current and future applicant CP2 systems to report how their proposed business certification systems (third-party or internally developed) address each of the headings above and how are these verified.

7. Long term sustainability of the label.

Key questions:

- Does the body in charge have secure financial, political and operational security?
- What would happen if in a PA there was a doubling business applicants? What would happen if they halved?
- Is the certification scheme selected (when third-party) in a position to develop a good partnership with the PA (like availability of support, capacity to answer requests in short-time frames, availability to joint initiatives, etc.)?
- Does the certification scheme selected enjoys support from the business community? And from the remaining PA community?

Proposal

EUROPARC should also ask from current and future applicant CP2 systems to report how their proposed business certification systems (third-party or internally developed) address each of the questions above and how are these verified.



Summary

Evaluation of objectives, standards and business certification systems for CP2 validation purposes

CP2 Key Objective 1: Partnership Strengthening

The mechanisms and requirements set in the official text of Section II set a system that ultimately aims at strengthening the partnership between PA authorities and tourism businesses (candidate Charter Partners) comprised of: definition of a European Charter Partnership Programme between the PA authority and individual businesses setting commitments from both sides; signing of a European Charter Partnership Agreement; and validating this through a European Charter Partnership Certificate for public display and recognition.

Nevertheless, although the mechanisms above provide a level of reassurance that CP2 objectives are pursued, they don't provide directions into demonstrating how are these achieved, nor how can they be commonly demonstrated across sites and different CP2 systems.

Proposal:

CP2 systems submitted for validation should be explicit and demonstrate how will Partnership Programmes under their umbrella be maintained and monitored through time. Process criteria and indicators should be suggested, for instance:

- Number and/or periodicity of meetings with the business throughout the year
- Number of Forum meetings the business attends
- Training provided and attended
- Level of one-to-one support a business will get
- Resources that the PAs should provide (or secure from other sources) to maintain the Partnerships at local level
- Business satisfaction studies
- Etc.

CP2 Key Objective 2: Differentiate Charter Partners as sustainable tourism businesses

Common Sustainability Standards for Tourism Businesses

All CP2 systems currently approved or under development include a strong component addressed at supporting a business moving up the sustainability ladder, improving practices, implementing environmental management systems, etc. This is also one of the areas where more diversity is



expected between CP2 systems, given the different contexts, different understandings, and different tools and institutional levels of support available to businesses and PA authorities between countries and regions. The proposals below address the following question: how to guarantee that businesses certified as Charter Partners are following common minimum sustainability standards and criteria across Europe?

1. Contents of the standard.

Proposal:

EUROPARC to use Global Sustainable Tourism Criteria as the basis to inform, assess and validate business certification approaches included in CP2 systems.

CP2 systems submitted for validation should include a discussion on how its proposed business certification scheme addresses the GSTC minimum standards, in what way, what criteria were not considered and why, etc.

2. Regular revision of the standard criteria.

Proposal

EUROPARC should require from current and future applicant CP2 systems the condition to include a regular revision of business sustainability standards and criteria every 3 years.

Quality and sustainability of the business certification and support system

Some CP2 systems created (or will create) their own list of standards and criteria to assess business sustainability practices, whilst others have opted (or will opt) to incorporate already existing business certification tools to address the monitoring of these issues. The proposals below address the following questions: how to guarantee that validated CP2 systems provide common minimum levels of quality in terms of support to business sustainability practices – be they provided by the PAs or by third-parties?

Proposal

EUROPARC should also ask current and future applicant CP2 systems to report how their proposed business certification systems (third-party or internally developed) address each of the headings of the list below how are these verified.



3. Quality assurance.
 - 3.1. Organisation.
 - 3.2. Legislation compliance.
 - 3.3. Quality system.
 - 3.4. Validity of certification.
 - 3.5. Appeals, complaints and disputes.
 - 3.6. Avoidance of conflict of interest.

4. Quality of assessment.
 - 4.1. Certification body personnel.
 - 4.2. Qualification criteria.
 - 4.3. Independence of functions
 - 4.4. Subcontracting.

5. Value of certification.
 - 5.1. Performance to meet the standard.
 - 5.2. Meaningful label.

6. Benefits to certified businesses.
 - 6.1. Technical assistance.
 - 6.2. Marketing and communication.

7. Long term sustainability of the label.
 - 7.1. Does the body in charge have secure financial, political and operational security?
 - 7.2. What would happen if in a PA there was a doubling business applicants? What would happen if they halved?
 - 7.3. Is the certification scheme selected (when third-party) in a position to develop a good partnership with the PA (like availability of support, capacity to answer requests in short-time frames, availability to joint initiatives, etc.)?
 - 7.4. Does the certification scheme selected enjoys support from the business community? And from the remaining PA community?

The previous chapters provide guidance on what type of issues and information should be taken in consideration for each subject.

D. SYSTEMS AND PROCESSES FOR CP2 VALIDATION

Section X presented some of the questions raised during work in the STEPPA project about the challenges for EUROPARC in setting a comprehensive validation for CP2 proposals. These included questions on:

- Verification process
- Monitoring systems
- Provision of evaluation guidelines to Charter Evaluation Committee and EUROPARC Council
- Safeguarding of the EUROPARC and Charter brands

Since these issues are directly related with EUROPARC's own governance systems, they are out of the remit of STEPPA's objectives. They should instead be discussed by the Charter Sustainable Tourism Working Group, Evaluation Committee, EUROPARC's Directorate and EUROPARC Consulting. However, we can provide some recommendations and suggestions to inform these discussions, based on work previously developed on these areas by ICRT.

The process of auditing compliance

EUROPARC is currently not applying the same level of rigour to evaluating CP1 and CP2 processes. Whilst understanding that in practice the success of CP2 systems will be very dependent on their implementation on the ground at individual park level, they also provide more exposure to EUROPARC and the Charter, with what practices it is associated with, and also more risk of misuse of the Charter brand once an increasing number of private businesses are making use of it.

Auditing of CP2 systems should take place not only at the time of submission for validation but also at regular cycles similar to CP1 to ensure they are still fit for purpose and kept up to date.

The suggestions below provide two possible scenarios regarding CP2 auditing process:

Self audit. The CP2 Guarantor (the Section, National or Regional body that develops the CP2 system and submits it to EUROPARC) uses the recommendations and criteria proposed in this document, together with the official Section II Charter documentation, to evaluate periodically the quality of their CP2 work. The cost to EUROPARC is minimal- to check the self audits and submit the results to the Evaluation Committee and Council.

Third party independent audit. A pool of European experts in sustainability certification is appointed to evaluate CP2 systems, in the same way that CP1 is evaluated independently. The current pool for CP1 might not necessarily have the expertise in the management of sustainability certification programmes to undertake both tasks, so training would be needed or the use of additional expertise. There would be a bigger cost that ideally should be absorbed by the bodies submitting CP2 systems. (As an example, a similar type of third party process is already taking place in England, Wales and Ireland, with ICRT auditing all sustainable tourism certification programmes that seek national tourist board support, at a cost of 3,000 EUR plus travel/living expenses per certification programme. The certification programme typically absorbs this cost.)

Guidance notes for a CP2 auditor

The following information provides some auditing guidelines that could be used both in the self-auditing or third-party independent auditing scenarios presented above. They could also serve to inform an auditing training programme that EUROPARC could develop for its CP2 auditors. In the case of self auditing, the CP2 “creator” and guarantor (e.g. Section) could use this information to support its internal quality process and prepare its CP2 submission (or revision report). Not all questions might necessarily apply in all CP2 systems, but the examples constitute best practices that should be aspired to by all CP2 systems.

CP2 Key Objective 1: Partnership Strengthening

Some CP2 systems provide good initial templates for future ones for their well structured information layout, and how they cover the current requirements and guidelines of the official CP2 documentation. An example of such is the Spanish CP2 system, which was also used to inform the Italian CP2 system (with a version available in English). Some of this information includes:

PARTNERSHIP ACCREDITATION SYSTEM SCOPE

- Tourism businesses eligibility
- Partnership accreditation system territorial scope of application
- Responsibility and functions of the various administrations and entities involved
- Partnership term of validity

CONDITIONS OF ACCESS

- Conditions of access for protected areas
- Conditions of access for tourism businesses

COMMITMENTS

- Commitments of the protected areas
- Commitments of the tourism businesses

PARTNERSHIP ACCREDITATION PROCESS

- Information on the key stages and stakeholders involved in the business accreditation process

MONITORING

- Monitoring of the application of the System at the State level
- Monitoring of the application of the System at the protected area level
- Monitoring of the application of the System at the business level

ANNEXES

- Model list of requirements for tourism businesses
- Model list of obligatory and voluntary actions for businesses
- Model list of protected area commitments

- Model Business Action Plan
- Model Partnership Agreement
- Model Partnership Certificate

Following from the recommendations presented before in this document, we propose that for auditing purposes more specific information should be asked regarding monitoring and the specific process indicators required to assess the success of the partnership processes on the ground. At the moment, both the Spanish and Italian CP2 systems only state that their respective EUROPARC Sections will be “the entity responsible for monitoring the application of the System at the State level, and will basically be provided with information on which protected areas have put the System into operation, the application methodology being employed and the businesses accredited with the ECST in Italy”⁶.

These indicators allow a quantitative measurement of success in terms of numbers of PAs and businesses affected, but don't allow qualitative proxy to assess the quality or intensity of those partnerships on the ground. More specific qualitative indicators should be asked by the auditor to be included in official CP2 texts that would constitute requirements (and not suggestions) for the PA/business partnerships at local level. The indicators presented before in this document constitute suggestions for these but should by no means be seen as restrictive or be uncritically adapted.

CP2 Key Objective 2: Differentiate Charter Partners as sustainable tourism businesses

Common Sustainability Standards for Tourism Businesses

1. *The contents of the standard.*

Ask how the business sustainability standards compare with the Global Sustainable Tourism Criteria, including what criteria were not included and why.

Ask to see the content of the standard that is sent to business partners, and make sure that it covers all the expected areas of content. Environmental efficiency (energy, water, waste) should not dominate. Contribution to climate change, customer education, staff training, biodiversity, local/sustainable sourcing, and socio-economic sustainability should all be there, and be given comparable if not equal importance.

2. *Regular revision of the standard criteria.*

⁶ From the Italian CP2 system (English version)



Check the date of when the standard was created, and who was responsible for it, and which stakeholders were involved. Ask when the next revision of the standard will take place, and how this is planned. If the gap between reviews is more than 5 years, make sure that the criteria are current.

Quality and sustainability of the business certification and support system

Many of the issues below are more pertinent for CP2 approaches that use third-party business certification than their own, but still provide useful guidance for the management of own systems.

3. Quality assurance.

3.1. Organisation

Check that the systems in place for certification make sense and are logical and consistent. All stakeholders should get the same information and the information publicly available matches with the functioning of the certification body. Check the process of taking decisions and ask for any circumstances when they have deviated from the norm. Check what are the functions or activities that the certification body claims they undertake and check that it has sufficient staff to perform them well- spot check written evidence of some recent activities to see how these are done.

3.2 Legislation compliance.

Check that a list of relevant legislation (tourism, environmental, etc) was produced and made available for partner businesses, including an easy-to-read checklist of typical failures. In the case of self-created certification systems, check that there is training in place by the national entity (e.g. Section) to guarantee that staff at PA level managing business Partnership Agreements understands this legislation and can properly advise business partners.

3.3. Quality system.

Ask to see data how many applicants were new to the programme in the last year, how many left the programme and information on why they left, how many continued (more applicable to third-party schemes or CP2 systems being re-evaluated). If they cannot provide this data quickly, there are fundamental errors. Ask to see how do they know what is the level of performance of different companies on key quantifiable criteria. Ask then to see copies of the correspondence that they would have with a company from first enquiry until they are certified, and then copies of the newsletters sent to the certified companies in the last year. Ask to see how records are kept of when each company needs to be assessed again, and how we make sure that the assessments take place on time. Check that companies are not awaiting grading for over 6 months, and only under exceptional circumstances beyond the certification body's control for up to 12 months.

3.4. Validity of certification

Check how often on site inspections take place at least every second year, and ideally every year. If this is not the case, you need to thoroughly check that the information collected in between is



enough to assure that the company is making progress and not just waiting until the next assessment.

3.5. Appeals, complaints and disputes.

Ask to see the procedures to record appeals, complaints and disputes. If none are recorded, ask to see how companies are told that they could complain or appeal if they are unhappy with the service provided. If no procedures are in place, ask why not and how they plan to put some in place.

3.6 . Avoidance of conflict of interest.

Ask what records are kept of potential conflict of interest from individuals working in the certification programme being unfairly influenced towards some of the applicants or other stakeholders, and how the certification programme deals with it. It is typical that either the assessors have in the past been consultants for some of the firms that are applying for certification, or that relatives of staff working for the certification programme will own or work in some of the applicants' companies. While this is not a problem per se, it is necessary to make sure that these companies are not advantaged, or are not perceived to be advantaged by other applicants. Ask to see records of companies applying that have dropped category (for example if the programme runs a gold-silver-bronze, that have gone down one step, or if the programme is in percentages of performance, that have at least 5% less than last time). If this never happens, it is possible that the certification programme is scared to lose members and is artificially inflating marks- this happens quite often! In which case you need to ask further questions of why all companies always improve, and how they justify this.

4. Quality of assessment.

4.1. Certification body personnel

Ask what are the qualifications from staff, to find out their background- are they qualified environmental auditors/assessors? This often means they will be very good at the environmental management systems, and the key typical environmental impacts of a building, but less good at other aspects such as socio-economic, or biodiversity to mention some. If that's the case, check that the personnel will be competent for technical, policy and implementation functions. Where personnel have qualifications for only part of the standard (i.e. ecology/biodiversity, environmental auditing, or socio-economic), the certification body will ensure that additional training has been undertaken to be able to audit the full range of the programme's criteria.

4.2. Qualification criteria.

As in 4.1. but now in more detail, and focusing on the assessors. Then check data on the training that these assessors have received on the standard (all too often they have generic training on environmental auditing but know relatively little about the specific certification programme). Check how many companies they assess for this programme per year, and how do they make sure their knowledge on the content of the criteria is kept up to date.

4.3. *Independence of functions.*

Check who provides technical assistance, and that the same person doesn't then conduct the assessment. Check that if these functions are not separate, at least the assessor is someone that has had no involvement with that company in the past and that the certification body has a system in place to assure this.

4.4. *Subcontracting.*

Check that all subcontractors have the necessary experience to be assessors or to provide the required technical assistance.

5. **Value of certification.**

5.1. *Performance to meet the standard.*

Check that the level of performance required is sufficiently high to credibly tell the world these are sustainable companies that deserve the park's endorsement. Criteria that do not require a stipulated minimum performance and don't ask for continuous improvement are usually problematic. Check reports from a given company from the last two assessments and compare them - has substantial improvement taken place, or if not were they already performing at a very high level? Are there areas of low performance that could very easily be addressed (e.g. low investment aspects of environmental management, lack of staff training in place, poor management of hotel grounds to improve conservation and biodiversity, little education of customers on what to do different).

5.2. *Meaningful label.*

Ask the certification programme how do they know the difference that the label has made. If you know who finances the programme, ask how do they prove to that financing body that the programme deserves maintaining. If they don't, ask how would they actually prove it anyway. Give the certification body some scenarios and see whether they have or could have such data. The data can be benchmarking against past performance (e.g. certified companies have reduced their energy consumption per guest night by 20% since joining the certification programme) or benchmarking against the destination average (e.g. certified companies purchase on average 20% more local produce from biological suppliers than non certified companies). If case studies are used, these should be representative of the full range of firms certified, not using the highest performing firms as if typical. Check whether the actions highlighted as best practice are the result of advice from the certification programme, or if these are things the certified company was already doing beforehand (quite often the pioneers in certification were already very good before being certified, while other companies entering later on learn very little).

6. Benefits to certified businesses.

6.1. Technical assistance.

Check that the technical assistance provided is appropriate to the needs of applicants and awardees. What is the staff dedicated to this and are the numbers sufficient for the numbers of businesses? Is technical assistance available with through direct contact or only distance contact? Is there a permanent number businesses can call to, or other form of permanent support? Are there self support materials to allow tourism companies to meet the certification standards? Is there advice available that is suitable to support small firms, like what are the easier criteria to start with, which initiatives provide the best return on investment or will help save money, etc. Is support available pre and between assessments? Check also if the format of technical assistance provided conflicts in any way with the function of independently auditing performance. Are the same people providing auditing and technical support?

6.2. Marketing and communication.

Check if the certification programme has a marketing and communication plan for its applicants and awardees. How easy does it make for its business members to access marketing channels and what and where are these channels? Are these aimed at markets that value protected areas? Does it provide advice on how businesses can use their sustainability credentials for marketing purposes and customer engagement? Does it have a strategy and advice for businesses on how to educate the consumer once it is in the business and raise awareness and knowledge around environmental and conservation issues?

7. Long term sustainability of the label.

This is one of the most difficult criteria to verify, because it is very intangible, but at the same time is one of the most important. How do we get a sense that the certification body has developed a worthwhile relationship between the park and businesses?

Check that the price charged is sufficient to pay the variable costs of the assessment, and what contribution it makes to the fixed costs of running the certification body. What percentage of the current operating costs is subsidised, by whom, and how secure is it? Check what would happen if the number of applicants doubled, or halved, in the next three years- can the programme cope with the increase, or survive the cuts?

Check if the certification body has maintained a good level of communication with the park authority, and if the latter is satisfied with the level of service provided. Have they developed joint initiatives (for instance training for local businesses, park staff or other)

What are the views of the business community with the levels and quality of service of the certification body? Have these been evaluated in any way?

www.europarc.org