



14 February 2013

The Programme Officer, Standards Setting (Christine Kalui)  
Eco Mark Africa (EMA) AEM Secretariat  
P O Box 41607  
00100 Nairobi  
Kenya

Dear Christine

**RE: Feedback on the development process of the Eco Mark Africa draft standard for tourism**

Following the end of the public review process on EMA draft standards for tourism and the subsequent reaction to comments received, the Sustainable Tourism Certification Alliance Africa (the "Alliance") received the final output on the draft standards for tourism for our evaluation and comments on 4 February 2013.

We have noted that the final draft standard received differ significantly in appearance and structure from the original committee draft that was circulated for public preview in September 2012. Our understanding is that the material changes were effected as a result of technical decisions made by the Africa Eco-labelling Mechanism (AEM) secretariat to structure the content based on principles, with each principles having criteria and indicators. We recognise the need for structural changes to align the document with the requirements with *ISO/IEC Directive 2: Rules for structure and drafting of international standards*. However, these amendments, additions and exclusions and the introduction of associated criteria and indicators has resulted in revised standard that is significantly different to the version previously agreed to, through consensus, by the EMA Tourism Sector Working Group (SWG) as chaired by Ms Heidi van der Watt (Chair of the Alliance Standards and Sharing of Best Practice working group).

In consideration of the above, we would like to highlight the following concerns pertaining to the process of preparing a revised draft standard:

- i. Fundamental governance issues in relation to the manner in which decisions were taken to make material changes to the draft agreed upon by the tourism SWG in the absence of consultation with the SWG (and subsequent to the public comment period) - the SWG chairs were informed of the process of identifying criteria and indicators, but were not invited to make a contribution in January 2013 after the changes had been made;
- ii. At a meeting of the SWG chairs on the 4<sup>th</sup> February 2013, a target date of end March 2013 for the approval of the standard by the Executive Board was communicated. We believe that best practice would require SWG members and Chairs be provided with adequate opportunity to consult with their constituencies, subsequent to which a further public review period would be advised given the significant changes effected; and
- iii. The transparency of the standards development process.

Fair Trade in Tourism South Africa (FTTSA), a not-for-profit company registered in South Africa, is the elected Secretariat to the Alliance during 2012-2015.  
Physical Address: 34A Hatfield Corner, 1270 Church Street, Colbyn, Pretoria 0083, South Africa  
Postal Address: 12844, Queenswood, Pretoria 0121, South Africa  
Tel: +27 (0)12 342 2945 / Fax: +27 (0)12 342 2946 / Email: [secretariat@sustainabletourismalliance.co.za](mailto:secretariat@sustainabletourismalliance.co.za)  
Website: [www.sustainabletourismalliance.co.za](http://www.sustainabletourismalliance.co.za)

We remain appreciative of the opportunity afforded to us to participate in the EMA tourism standards development process prior to finalisation of a draft standard for tourism. However, we are hopeful, going forward, that adequate inclusion of African tourism stakeholders such as members of the tourism SWG (which includes the Alliance Secretariat and Alliance members) will be the foundation of developing and finalising the standard and associated procedural documents. In this vein, a comprehensive technical response to the revised draft standard will be tabled at the upcoming SWG meeting scheduled to take place on 19 February 2013.

Kindly note that Alliance membership is currently comprised of the organisations listed in the table below:

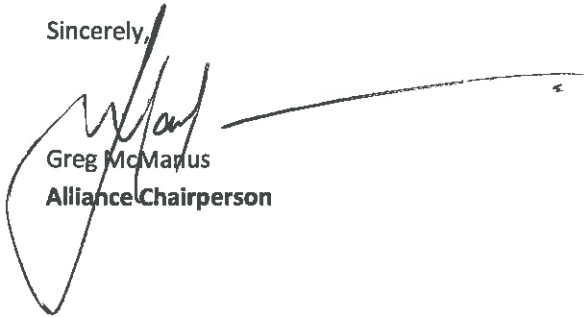
No.	Country	Organisation	Membership Category
1	Botswana	Botswana Tourism Organisation	<b>Certification scheme owners and certification bodies based in Africa</b>
2	Germany	TourCert	International and/or regional certification scheme owners and certification bodies involved in tourism certification in Africa
3	Kenya	Basecamp Foundation Kenya	Business development service providers (BDSPs) in Africa providing services to tourism businesses and/or certification schemes
4	Kenya	Eco Tourism Kenya	<b>Certification scheme owners and certification bodies based in Africa</b>
5	Namibia	Eco Awards Namibia Alliance	<b>Certification scheme owners and certification bodies based in Africa</b>
6	Seychelles	Seychelles Tourism Board	<b>Certification scheme owners and certification bodies based in Africa</b>
7	South Africa	Fair Trade in Tourism South Africa(FTTSA)	<b>Certification scheme owners and certification bodies based in Africa</b>
8	South Africa	Heritage - The Environmental Management Company	<b>Certification scheme owners and certification bodies based in Africa</b>
9	South Africa	National Department of Tourism	Tourism boards and tourism ministries responsible for creating an enabling environment for sustainable tourism certification / seeking to position their responsible destinations in the marketplace
10	South Africa	Levelle Perspectives	Business development service providers (BDSPs) in Africa providing services to tourism businesses and/or certification schemes
11	Southern Africa	RETOSA	SADC mandated regionally focused organisation with a stake in sustainable tourism certification
12	Southern Africa	Stand cc	Business development service providers (BDSPs) in Africa providing services to tourism businesses and/or certification schemes
13	Southern Africa	African Safari Lodge Foundation	Business development service providers (BDSPs) in Africa providing services to tourism businesses and/or certification schemes
14	Southern Africa	Serendipity Africa	Business development service providers (BDSPs) in Africa providing services to tourism businesses and/or certification schemes
15	Tanzania	Responsible Tourism Tanzania	<b>Certification scheme owners and certification bodies based in Africa</b>
16	South Africa	International Centre for Responsible Tourism – South Africa	Business development service providers (BDSPs) in Africa providing services to tourism businesses and/or certification schemes

Lastly, we would like to advise that the Alliance Executive Committee has confirmed that Heidi van der Watt is mandated to drive communication/correspondence on matters relating to the EMA tourism standards development process.

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We look forward to hearing back from you on the matters raised, and are hopeful of a favourable response in this regard.

Sincerely,



Greg McMapus  
Alliance Chairperson