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Mr Tim Grimwade
General Manager
Adjudication Branch
Australian Competition and Consumer Commission
PO Box 1199
Dickson ACT 2602

Dear Mr Grimwade

Thank you for your letter of 31 March 2004 regarding preferential/exclusive treatment of accredited tourism businesses (A90912 and A90913) as detailed in a submission from the Department of Industry, Tourism and Resources.

Green Globe Asia Pacific is pleased to provide the following comments in relation to the applications. Whilst Green Globe Asia Pacific fully endorses the principle of encouraging the operation of high quality, viable tourism businesses as a means of maintaining and building Australia's national and international tourism industry reputation there are some serious concerns that the approach suggested may lead to the exclusion of tourism product which does not exactly meet the criteria prescribed.

Green Globe Asia Pacific provides the global administration of the GREEN GLOBE 21 program which is an environmental benchmarking, certification and improvement program for sustainable travel and tourism. We are committed to year on year improvements in the delivery of sound environmental and social performance by tourism companies and communities. As such we do not fit neatly within the current national accreditation framework as we are not a sectoral program (although GREEN GLOBE covers 23 sub sectors of tourism industry activity, including airports, cruise ships, accommodation, restaurants, railways, golf courses, convention centres etc) and whilst we require compliance with relevant legislation, a strong emphasis on occupational health and safety issues and independent audits we do not as yet have specific requirements relating to the completion of a business module for an operation to receive Certification under our program.

As such, tourism operations participating in the GREEN GLOBE program in Australia may be excluded until a suitable arrangement for delivery of a business module can be determined and for this to happen there will be cost implications both in terms of our administration resources and fee structure for participants. This could have the impact of making our program less competitive and also less efficient in its delivery.

We have on a number of occasions sought to collaborate with the Australian Tourism Accreditation Association and they have acknowledged the value of our program in encouraging environmental sustainability and improved operating and resource use efficiencies, both of which are strong elements of a viable tourism industry. ATAA has recognized that GREEN GLOBE is consistent with the sustainability objectives of the Australian Tourism Accreditation Standard and has the capacity to provide an advanced environmental and social sustainability module to those operators who wish to demonstrate their credentials and that companies certifying under the GREEN GLOBE program could also certify under ATAA programs.

The submission from ITR notes that Green Globe Asia Pacific "is not seeking alignment with ATAA and is targeting larger businesses who would not see most ATAA programs as substitutes". The reality is in fact that a large proportion of our customers in Australia and elsewhere are small to medium enterprises and they are very likely be faced with a choice between which accreditation programs best suit their needs ie there is a high level of substitution based on cost constraints. Recent experience with the implementation of the Qualmark program in New Zealand has had a significant impact on micro and small businesses which have

been faced with significant government pressure to subscribe to the Qualmark program. With their small staffing levels and lack of discretionary spending many have had to make the choice between participating in the Qualmark program or GREEN GLOBE even though the latter may suit their business positioning better. In Australia, if a choice is available, an operation is likely to choose an ATAA accredited program so as to receive STO support. That is not to say that the Certification under the GREEN GLOBE program is any less valuable in delivering high quality product.

In our view, the exclusive or preferential provision of tourism promotion and wholesaling services to tourism businesses that have specified accreditation is potentially discriminatory. In the ITR submission it is asserted that there will only be a small reduction in revenue and viability as a result of non alignment but there is a potentially large impact on those groups which do not have access to marketing benefits. There is the risk that participation in business accreditation programs will become a method of excluding emerging sectoral interests. The participation in a business program is not the only indicator of a viable and reliable product and the use of this criterion alone on which to deliver services may not be an adequate safeguard of overall quality delivery. Indeed the Government's Tourism White paper emphasises the importance of sustainable tourism that is ecologically sustainable and socially responsible which is based on an integration of economic, social and environmental objectives. The adoption of environmental best practice strategies and the preservation of Australia's environment is a vital step in the achievement of the "Platinum Plus" status and the basis of Australia's competitive differentiation in the international market and there should be due recognition for the role of programs that encourage the delivery of sustainable environmental outcomes.

If you require any further information, please do not hesitate to contact me on 62579102.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Parsons'.

Cathy Parsons
CEO
Green Globe Asia Pacific
30 April 2004