

European Federation of Tourist Guides Associations

Qualified Interpretation of Culture

Ambassadors of Excellence



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To the attention of:

Slovenian Ministry of Economy

Association of Regional Tourist Guides of Slovenia

FEG GUIDELINES FOR REGULATION OF PROFESSIONS IN THE EU

The regulation of the tourist guide profession is justified for the following reasons:

1. The work of tourist guides is, for the most part, related to a specific region and area and normally associated with a comparatively minor degree of European cross border mobility. As a result, the professional qualification in this field has significantly fewer contact points with the freedom of service and the freedom of establishment as is the case with other occupations.
2. Consumer protection: Only an appropriately well-trained and qualified tourist guide can give clients authentic and accurate information, thereby offering a reliable service for their fee. Therefore, regulation is paramount for the consumer - a visitor from a third country or an EU citizen - protection of rights and for the transparency of guiding services offered.
3. As regards the communication of national and regional cultural heritage, tourist guides play a vital and crucial role. The information provided by well-trained guides contributes significantly to the cultural understanding in Europe and to the image that non-Europeans gain of Europe. A tourist guide is one of the closest contact persons for those travelling and they, therefore, carry particular responsibility for their work and activities. The EU itself has repeatedly stressed the significance of the common cultural heritage in Europe which is conveyed by qualified tourist guides. It should, therefore, be a matter of vital interest to the “public authorities” to ensure that this quality of information be maintained.
4. The only “resource” that a tourist guide has is his/her knowledge and the ability to communicate this – both require specialised qualifications. The statistically proven growing number of tourist guides throughout Europe is evidence that regulation is in no way an obstacle for the development of this profession – on the contrary: “If it costs nothing, it is



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worth nothing". A stable, justified and fair price for consumers is also guaranteed as a result of the sufficient numbers of guides offering their services.

5. Throughout Europe, regarding the work of tour managers and tour leaders who exercise different activities than those of a tourist guide, by accompanying groups in various countries abroad, there is an increasing tendency for them to be trained as qualified tourist guides of their own countries.
6. The work of tourist guides carries with it great responsibility, with the result that good training – above all when students are the clients – is a member-state training matter. In the EU, this issue has already been tackled and a CEN-Norm, which establishes a uniform minimum training standard throughout Europe, has been introduced and voted in 2008. European Norm EN 15565:2008 has created a minimal standard for the qualified training of tourist guides in Europe. Regulated training institutes across Europe, such as Wifi Vienna or the Cyprus Tourism Organisation or BVGD in Germany, for example, have had their training courses certified in accordance with this norm. More and more European countries are now in the process of implementing the EN15565 European Standard in their tourist guide training and exam system, so that their guide are certified to follow this European Norm.
7. An abolition of the legal regulation for tourist guides in Slovenia would:
 - a) Devalue the profession in general and
 - b) Present a significant hardship for all the hundreds of small companies which have invested time and money in the tourist guide training and whose professional qualification would thus lose its value. Tourist guides – in contrast to most other regulated branches – are almost exclusively one-person companies, which do not operate a physical company, but rather their entrepreneurship consists practically exclusively in their personally qualified services. Some qualified tourist guides can also work as employed persons in their member-states. If this basis were to be removed through deregulation, the profession would be completely devalued and the market would be flooded with unqualified individuals to the detriment of quality.
 - c) Those who protect and manage Europe's state or privately run cultural heritage sites/monuments/museums or natural sites always prefer and insist upon appropriately qualified tourist guides to represent them, even in the member-states where the tourist guide profession is non-regulated. Deregulation would result for each one of these Slovenian destinations/sites to establish their own rules and terms, which would eventually lead to total confusion and multi-tiered legislation per monument/city/region/country, exactly the opposite of what the Single Market principles support for the competition within the EU.
 - d) The EU would contradict its declared goal of "lifelong learning" as tourist guides constantly undertake further training which is offered by interest groups. It would also contradict the EU target to become the best qualified economy. Furthermore, the training and qualification systems, which have been developed in the past few years would be called into question

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because, in the case of deregulation, these would probably no longer be affordable due to a lack of demand. Considerable revenue would thus be lost and there would be a negative effect on those offering training, publishers and distributors of specialised literature, etc.

8. In general terms, one can note that the Slovenian government, with its tendency to further deregulate, calls into question its own professional recognition guidelines as well as the Europe-wide recognition system contained therein. One cannot expect that the resulting reduction in quality as a result of liberalisation will help the European single market in terms of competition. Europe is generally a high-standard region – a status which could be called into question unnecessarily as a result of an objectively unjustified deregulation. The Slovenian tourist guides will not easily be eligible to ask for the recognition of their professional qualifications in the other EU member-states or to declare that they will temporarily provide their services in other member-state of the EU, as done so far, under the modernised EU Directive 2013/55/EC.
9. As a result of both their specialised and, above all, area-specific knowledge as appropriate, tourist guides are also able to immediately take the correct measures in the case of health or safety issues. Competent and trained behaviour in emergencies, precise knowledge about the local conditions, local safety rules (emergency numbers, etc), first aid, knowledge of the local traffic regulations and the traffic organisations as well as the national language are all elements of the regulated tourist guide training and exams. An unqualified tourist guide is not in a position to react either appropriately or quickly in case of emergency.
10. In general terms, it is worth noting that the World Tourism Organisation of the United Nations demands an easing of the visa obligation as tourism is considered a peaceful communication of peoples. If guests are taken care of by appropriately qualified tourist guides and provided with neutral and objective information about culture, religion, politics, history or the behaviour of humans, this will enhance understanding for one another and prejudices will be removed. As such, tourist guides contribute towards a more peaceful co-existence of peoples and to a greater understanding between cultures. A lack of quality can create disadvantages.



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