EQUATIONS' Comments and Additions to the
DRAFT KERLA TOURISM POLICY 2011

Issued by Department of Tourism, Government of Kerala

EQUATIONS

The Kerala Tourism Policy 2011 (Draft) issued by the Department of Tourism, Government of Kerala in November 2011 recognises the role of local self-governing institutions in tourism development. The Policy statement also visualises sustainable development through involving local Panchayat and communities. Both these are welcome, and long due in a policy document. However, a perspective change needs to be brought in the policy. The objectives of the policy seems to be primarily about the role and functions of the Department of Tourism and the formal sector of the tourism industry while the informal sector of the tourism industry that constitutes a significant part of the industry and economy has been ignored. This paper critiques the policy and focuses on the tourism impact issues that need to be considered while finalising the draft tourism policy.

1. Preamble

“1.1 .... The economic significance of tourism in terms of employment, income, foreign exchange and regional development is a major driving force that enables national governments to place tourism appropriately in the development agenda.... Considering the labour intensive nature of the industry, tourism is being promoted in developing economies to address the issues related to unemployment and poverty reduction…”

EQUATIONS Comments:

a. Studies from across the country and EQUATIONS study in Andaman’s- has shown that, in relation to employment, tourism employs less than 1.5 per cent of the total main workforce. A substantial proportion of the workforce in tourism is of a marginal and seasonal nature. This substantial proportion of the workforce does not receive secure income from tourism throughout the year.

b. Research in India has not given evidence of substantive contribution of tourism to poverty reduction, and examples abound of places of high tourist visitation, where high levels of poverty persist.

“1.4...In tourism ventures small and medium enterprises dominate today. The importance of tourism from a development perspective is realized by local self-government and local communities also. A perfect synergy between public and private sector is created in tourism and the need of the hour is to promote quality on all fronts to provide world-class experiences to tourist without deteriorating society, environment while strengthening the economy.

EQUATIONS Comments:

It is also important to prioritise local communities needs as well.

2. Vision

Tourism becomes a vibrant and significant contributor to the sustainable development of the state of Kerala

EQUATIONS Comments:

The vision for the State is progressive. However, it is critical to define and unpack the meaning of sustainable development.

3. Mission

“3.1 The state delivers a world-class, yet local visitor experience ... state and the country”.

4. Objectives

“4.1 To ensure quality visitor experience ... 
4.5 To develop quality human resources in tourism and hospitality”
EQUATIONS Comments:

a. The vision, mission and the objectives are not connected. The mission and objectives of the policy do not lead to the vision envisaged in this policy.

b. A perspective change needs to be brought in the policy. The objectives of the policy seems to be primarily about the role and functions of the Department of Tourism and the formal sector of the tourism industry while the informal sector of the tourism industry that constitutes a significant part of the industry and economy (estimates say 80%) has been ignored.

c. The policy reads as most of the regular materials of the Department of Tourism giving overwhelming emphasis to infrastructure development, image building and promotion and little weightage to the varied issues and impacts of tourism development that are being experienced by the people living at tourist destinations, or aiming to benefit from tourism. Special focus must be given towards the impacts of tourism on women, children, vulnerable and marginalised communities.

d. It is critical to see communities as a key stakeholder to be consulted in planning for tourism. Thus, not only benefits to community but the role, participation, decision making, influence of communities in shaping tourism needs to be considered.

e. In addition to the benefits, it is important to consider the environmental, social, cultural and sustainability aspects as significant to include in the objectives.

5. To ensure quality visitor experience

“5.1 Basic infrastructure at destinations

“.... A Cabinet Committee on Tourism will be formed with Chief Minister as Chairman, Minister for Tourism as Vice Chairman and Ministers of related line departments as members to oversee the implementation of infrastructure plans, which are vital to tourism sector... We will form a Task force on Infrastructure Development, with Minister for Tourism as the Chairman, consisting of members of the tourism industry and representative of line departments...”

EQUATIONS Comments:

a. The roles and responsibilities of the multiple committees and task forces are unclear.

b. Rather than formation of so many committees / task forces, etc, the policy may consider an institutional structure that privileges synchronising, collaborating and coordinating efforts – as this is what is lacking today. Thus sub-committees that may take up specific aspects or responsibility but are accountable ultimately to a coordination mechanism could be conceived.

c. There core committee established at the state level could play the think tank role. This role can be replicated at district / destination level to look into all the aspects of tourism at that level.

d. In the core committee there should be minimum 30% LSGIs participation.

e. Infrastructure should take into account needs of local people and should not only privilege needs of tourism industry and tourists. Tourism infrastructure development should not lead to displacement and dispossession of people.

“5.1.3... A new campaign on Kerala Waste Free Destination will be launched with the active participation of local bodies, NGOs and Self Help Groups and a task force will be constituted....”

EQUATIONS Comments:

a. Kerala Waste Free Destination is a laudable and critical initiative. To learn from the various innovative projects across the country as well as the experiences from Zero Waste Kovalam project initiated by Thanal.
5.2 Managing tourism resources

"5.2.2 More than a thousand houseboats are operated in this region, resulting in some back waters stretches in this region with density much above the carrying capacity...We will also introduce special incentives for starting houseboat operations in areas other than Vembanad Lake”.

EQUATIONS Comments:

a. There is a need to undertake Tourism Impact Assessment before expansion of the houseboat operations to other lakes. The policy itself acknowledges the adverse effect of high-density houseboat operations in Vembanad Lake. It would be foolish and irresponsible to expand this without understanding the dynamics of what has gone wrong with Vembanad.

b. If incentives are given to operate other than Vembanad Lake, it may trigger massive reclamation of backwaters for tourism, urbanisation, leading to destruction of the fragile backwater ecosystem and biodiversity.

c. Increase of houseboats and home stays also increase the vulnerability of children to sexual abuse as well as increased prostitution rackets as these activities are more hidden.

d. To use the concept of limits of acceptable change before identification of a site to promote backwater tourism as well as for any other form of tourism (a brief note on this concept is annexed – Encl 1. Note on limit of acceptable change).

"5.2.3 Approval from the department will be made mandatory for obtaining license from local self governments for the homestays and ayurveda centres. We will work with the Local self government department for this”

EQUATIONS Comments:

a. Approval from local self-governing institutions (LSGIs) must be made mandatory before approaching the Department. We assume this is what the policy recommends?

b. All the tourism establishments need to seek approval from LSGI and the Department, not only homestays and ayurveda centres.

"5.2.4 Department of Tourism, in association with Forests and Wildlife Department, will take steps to step up ecotourism initiatives, that will provide visitors new experiences and bring revenue to the eco-development committees.”

EQUATIONS Comments:

a. Eco Development Committees (EDC) which were initiated as part of a World Bank project in specific sites are not enduring institutional structures. We recommend that the Gram Sabhas and the Panchayats be structurally linked to revenues from tourism and decision making in relation to tourism.

While promoting ecotourism, the policy needs to refer the draft Guidelines for Ecotourism in and around Protected Areas which was issued by the Ministry of Environment and Forests on June 2, 2011 and to EQUATIONS analysis of the draft guidelines (Encl 2. EQS comments on the draft ecotourism policy).

5.3 Development of local leisure destinations and enhancing local level experiences

"5.3.2 There are known and lesser known attractions in the state. Ensuring essential facilities in these areas can enhance visitor experience. We will improve the facilities at the known destinations and create facilities at the lesser known destinations”
Tourism policy should recommend first the management, evaluation and monitoring of the popular destinations particularly for the mitigation of negative impacts before selecting new and lesser known destinations.

The criteria for selecting new destinations, likely benefits, likely impacts and local consultations including a thorough tourism impact assessment must be part of the regular process of opening up new destinations. Without this the phenomena of spent destinations and moving to new ones will simply continue.

5.4 Assessing the quality of destination

5.4.1 To improve the quality of the destinations, it is important to understand the satisfaction level of tourists on the available facilities. Tourism department will conduct feedback surveys at major destinations periodically. Based on the information received from the surveys, the department will initiate corrective steps that will directly address issues of concern of visitors

Feedback of people living there also to be taken.

While understanding the concerns of the tourists is important, equally important is to understand the concerns and problems faces by local communities due to tourism and there is need for taking corrective steps.

5.5 Toilets at the destinations and en-route

5.5.1 Kerala Clean Toilet (KCT) Campaign: A commonly raised issue is the lack of well maintained public toilets in popular tourist destinations and routes. The department will formulate an Action Plan with a simple objective – to provide, directly or through partnerships with stakeholders, toilets and restrooms of acceptable standard, in every destination. We will also ensure that toilets are maintained at the same high level. The aim is to develop this into a zero complaint project.

This is a commendable idea. With regard to the provision of tourist facilities, we suggest that the policy consider assessing a range of facilities such as clean drinking water, waste disposal, waste management, toilets, sanitation, information, etc in a range of tourist facilities including actual sites of visitation, public amenities in destinations, bus stops, railways stations. We believe that the Department of Tourism should privilege the improvement of standards of basic hygiene in order to make Kerala a more tourist friendly destination.

5.8 Tourists information centres at all major tourism destinations

5.8.1 It is important to have facilities for providing quality information on tourism at every tourist centres, cities and major transport nodes. We will commence information centres at all major destinations, cities and transport nodes with IT enabled information kiosks and trained staff to cater the needs of visitors

While giving information on a destination the local history and cultural aspects should also be highlighted and the local communities involved in generating this information as it is their stories that are being told.

5.12 Development of destinations accessible to all including differently abled persons

5.12.1 Visitors with disabilities find it difficult to experience most of the attractions of Kerala. We intend to create facilities for persons with disabilities at a few select destinations on a pilot basis such as the Zoo and Museum Campus, Thiruvananthapuram and Fort Kochi, by working in coordination with custodian departments
5.13 Life Saving Initiative

EQUATIONS Comments:
To change the name from Life saving Initiative to Disaster Prevention Management & Safety as it will then accommodate a wider range of initiatives in safety and prevention.

"5.13.1 Kerala Tourism is heavily dependent on water based attractions such as beaches, backwaters, rivers, lakes and ponds which are prone to meet with accidents and casualties.... We will conduct training programmes for improving the skills of the existing lifeguards and provide them with sufficient modern life saving equipments"

EQUATIONS Comments:
- To have a plan and modern life saving equipments not only in the coast, but in all other areas such like pilgrim sites, hills, mountains, forest, etc.
- Strict adherence to norms / rules and strict action to be taken against the violations of norms / safety measures.

"5.13.3 A separate society will be formed for the Life Guard Services to make the service more efficient by providing proper training and latest equipments"

EQUATIONS Comments:
- In several states, the societies that are formed by the government end by functioning as a department of the government without any autonomous role.

5.14 Tourist Wardens at tourism destinations

"5.14.1 There are many instances of harassment and misbehaviour to the tourists at the destinations. To strengthen the existing systems that address such issues, we will introduce ‘Tourist Warden’ ...

EQUATIONS Comments:
- Old wine in new bottles! The softer term tourist warden is used instead of tourism police? However, this is no guarantee that the systems or processes will change or become more efficient. There is need to do a thorough assessment of the current scheme. Also, Tourist police or wardens or whatever they are called must also deal with situations of child abuse, child labour, harassment of local women in the context of tourism.

5.16 Exemption of tourism sector from hartals

"5.16.1 Tourism department will initiate discussions with political parties and trade unions to exempt tourism sector from hartals which cause serious inconvenience and loss in terms of money and time to tourists"

EQUATIONS Comments:
- This section in the policy is in violation of the Constitution of India as the right to protest and right to express is a fundamental right of the individual.
- It is also not clear how is it possible to exempt only the tourism sector from hartals while tourism has reliance on a wide set of vendors and facilities eg. public and private transportation, shops, eateries, attractions etc.
6. Community and Tourism

“We know that the participation and acceptance of the local community is critical for tourism... maximise positive impacts”

**EQUATIONS Comments:**

To have mechanism and action plan in place towards minimising the negative impacts - environment, social, cultural, economic impacts and promote tourism which is people centred.

6.2 Community and Socio-cultural aspects

“6.2.3 A Task Force against Trafficking and Abuse will be formed with officials from the departments of Social Welfare, Education, Law, Home, Health and Tourism to develop mechanisms and action plans to implement and monitor zero tolerance on trafficking, substance and child abuse in tourism”

**EQUATIONS Comments:**

a. While this is a welcome initiative by the state, the first step would be to unequivocally declare Zero Tolerance on child and women abuse and trafficking in Kerala.

b. To include the aspect of abuse and exploitation of women, and the misrepresentation of women in promotional material as well in the mechanism and action plans so as to mitigate negative impacts that tourism can have on women.

6.3 To strengthen and promote Responsible Tourism (RT)

“6.3.1 We will take steps to broad base the RT initiative throughout the state from the learnings from the pilot sites of Kovalam, Kumarakom, Thekkady and Wayanad.”

**EQUATIONS Comments:**

a. The learning of the three years of experience based on the assessment of the RT initiative needs to be clearly outlined and how this initiative can be taken forward.

b. The first phase of the RT initiative did not show much progress in functioning in the sites of Kovalam, Thekkady and Wayanad. The focus of RT was largely on economic benefits to the people. It is important to address and look into the aspects of social, cultural and environment impacts and address these with due urgency and seriousness.

c. The policy should stabilise the RT initiative in these four sites by taking into consideration the Sustainable Tourism development Criteria, Socio-Cultural Responsibility Criteria, Economic Responsibility Criteria and Environmental Responsibility Criteria and expand in a phased manner.

“6.3.2 It is essential to distinguish and encourage enterprises that are practicing RT principles. We will introduce and promote a new classification scheme for the tourism service providers known as RT Classification based on the principles of Global Sustainable Tourism Criteria. At least 30 percent of the classified and approved units located in rural areas will be converted to RT classified units in 10 years. The direct incentives given by the Department will be linked to RT practices.”

**EQUATIONS Comments:**

There is an initiative by the Ministry of Tourism in developing the Indian Sustainable Tourism Criteria (ISTC). Therefore, we would suggest to link to and contribute to this process, which aims to take the Indian context, realities and experiences into account.

6.4 Active involvement of Local Self Governments

“6.4.2 ...There is provision in the Town and Country Planning Act for declaring any area with special character as special zones and controlling its development with special guidelines prepared for that particular zone...”
7. To create enabling environment for investment

7.1 Fast track for clearance to tourism projects of investment above Rs. 10 crores

"7.1.1 In order to facilitate speedy clearances of the tourism projects, we will introduce fast track clearance to tourism projects for investment above 10 crores"

EQUATIONS Comments:

a. The process of taking clearance from LSGI should not be bypassed.

b. It should be mandatory to undertake Social Impact Assessment and Environment Impact Assessment for applying for clearance of tourism projects

c. Tourism Impact Assessment needs to be made mandatory (Encl 3. Note on Tourism Impact Assessment).

7.2 New subsidy system to promote Responsible Tourism (RT) practices

"7.2.2 In order to encourage local purchase by hotels to ensure economic benefit to local community, the government shall give a subsidy of 10% on the value of local purchase for those properties which score 60% and above of total score in the economic responsibility part of the RT Classification Scheme for the first 3 years."

EQUATIONS Comments:

Interesting point – the process of implementation and monitoring should be thought through carefully.

7.5 Residential tariff for homestays

"7.5.1 In order to promote homestays in the state, we shall stick on to residential tariff on electricity and water charges for homestays providers."

EQUATIONS Comments:

Classification of homestays is necessary, and definitions of homestays as well. Promotion of homestays has plus and minus points. It would be important to assess the experiences, benefits and realities in the state.

8.4 Strengthen Market Research

"8.4.1 The present method of collection of tourist statistics does not give more detailed input for conducting market research and marketing strategies. The system will be strengthened by incorporating collection of detailed tourist profile with the support of tourist accommodation providers"

EQUATIONS Comments:

a. In addition to market research, we recommend to have a wing that will undertake research on areas such as tourism impact assessment, development of master plan and destination plans and their effectiveness, as well as quality statistics will be essential. It would be important to define standard methodology of data collection as current statistics tourist visitation are quite unreliable. It would also be important to train people in the collection of reliable statistics.
9. To develop Human Resources in tourism and hospitality

9.1 Develop KITTS as an apex institute in HR development

"9.1.1 KITTS will be transformed as an apex institute to cater to the Human Resource requirement of Department and industry.... A separate research wing will be constituted to conduct research and studies of various aspects of tourism..."

**EQUATIONS Comments:**

a. It is a welcome move that the government is serious about spreading tourism education in the state. We hope this initiative will help in producing tourism professionals that the sector is in need of. It is important that the course material includes, tourism critique and sessions on impacts of tourism, so that the present perspective from which tourism is being taught in the state can be revamped and restructured to offer a more comprehensive view of tourism. Mainstreaming critical perspectives in tourism education in the state will help tourism students to widen their understanding on tourism issues and be able to manage tourism better.

b. We believe that the policy must look at kind of research and studies that need to be undertaken and by suggesting measures for the improvement of quality and reliability of the research produced as well as setting up of a group that would monitor on a continuous basis quality of research. This would ensure that policy decisions and directions are based on reliable data.

**In addition to the above the following points should also find a place in the policy:**

- To assess tourism’s contribution as a development engine - environmental, economic, social, cultural and institutional as well as take into account the negative impacts of tourism on all constituencies, especially children, women, adivasis, marginalised community.
- To include assessment of earlier tourism products, their investment and success particularly in terms of return on investment.
- Security net for SMEs and informal sector.
- The tourism policy to be followed by guidelines and implementable action plan.

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**End Notes**