Community-Based Tourism in Developing Countries: A Framework for Policy Evaluation

Andrea Yanes 1, Seweryn Zielinski 2*, Marleny Diaz Cano 3 and Seong-il Kim 2,4*

1 Department of Civil and Environmental, Universidad de la Costa, Barranquilla 080002, Colombia; ayanes1@cuc.edu.co
2 Department of Forest Sciences, Seoul National University, Seoul 151-742, Korea; seongil@snu.ac.kr
3 School of Law, Sergio Arboleda University, Santa Marta 470004, Colombia; marlenny.diaz@usa.edu.co
4 Research Institute of Agriculture and Life Sciences, Seoul National University, Seoul 151-742, Korea

* Correspondence: sew.zielinski@snu.ac.kr

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Abstract: Many developing countries have recognized the potential of their natural resources for the development of tourism. However, the policies designed to provide a framework for socially inclusive and ecologically sound tourism turn out to be weak in fostering community-based tourism (CBT). There is a spectrum of conditions that lead to success or failure of CBT initiatives that should be accounted for by national policies to ensure meaningful community engagement. This paper proposes a framework for the evaluation of tourism policy documents based on factors that facilitate and constrain CBT in developing countries. The framework was applied to seven tourism policy documents in Colombia using a content analysis approach. The results showed that the policies are weak in providing a base for community engagement in CBT. International experiences indicate that the barriers to CBT are similar throughout the world; thus, the framework is useful in the evaluation of policy documents in other developing countries.

Keywords: community-based tourism; policy; Colombia; participation

1. Introduction

Tourism in developing countries has been seen as an industry that can provide much-needed economic benefits in rural and remote areas to communities that lack knowledge and financial resources to take part in tourism development without external support. New development paradigms created under the umbrella of sustainability introduced principles that support and encourage self-help, self-reliance, and empowerment of communities. When sustainable tourism was introduced as a new global standard to replace conventional tourism, many countries designed policies that reflected this shift. As a result, concepts such as community participation, empowerment, transparency, fairness, equity, and equality were integrated into national regulations and development strategies [1]. However, these principles are not met purely by a simple statement in a policy document. For a policy to be effective, the objectives need insurance in terms of mechanisms that facilitate or guarantee compliance with these principles. The failure to provide them discredits the policy leading to its illegitimacy. Despite the potential, in many instances, the policies, plans, or programs do not provide a sufficient basis for meaningful community involvement [2].

Public policy is made by governmental actions: what governments say and what they do in relation to a problem or controversy [3]. Definitions of public policy highlight the fact that for a policy to be considered public, it must have been shaped within a framework of procedures determined by stakeholders with authority to solve specific problems. It does not imply, however, the involvement of non-governmental stakeholders in the design of the policy or that these problems are public. If policies,
plans, or programs do not provide a sufficient basis for meaningful community participation, they can be considered ineffective, as the law alone does not ensure legitimacy [4]. The involvement that leads the governed people to understand, value, and fulfil the regulatory framework is the condition that ensures and shapes its legitimacy. After all, policies and legislation should be developed in a way that creates a real possibility for the local people to play a major role in determining their own benefits from tourism [5].

To date, despite increasing attention focusing on evaluating the outcomes and process of tourism policy-making, there has been very little systematic or detailed examination of policy outputs, such as documents [6]. There is an evident gap in terms of frameworks that propose applicable universal criteria against which policy documents could be evaluated. In consequence, studies evaluating and/or comparing the effectiveness of tourism policy documents in meeting specific objectives are scarce. Therefore, the objective of this paper is to fill that gap by creating a framework for the evaluation of tourism policy documents in developing countries based on factors that facilitate and constrain CBT initiatives. The role of the framework is to evaluate compliance of tourism policy documents with criteria for successful development of CBT initiatives. The proposed framework can be used to evaluate, compare and design policies that create enabling conditions for community participation and development of CBT initiatives. Additional value lies in its applicability in other developing countries. Finally, the case study of Colombia shows the application of the framework, indicating the weak aspects of tourism policy design that should be refined to provide a better base for CBT.

Community Participation, CBT and Public Policy

This study uses Spenceley’s [7] (p. 288) definition of a community and a CBT initiative: “a community is a delimited place where people live and meet their daily needs trying to pursue their collective or individual agendas. A community-based tourism initiative is a project or program, or collective action of a group of people that belong to a community that decided to participate in, or develop together a small to medium scale local tourism industry”. Participation is a key concept in CBT development. It is a form of voluntary action in which individuals confront opportunities and responsibilities of citizenship, such as self-governance, response to external decisions that impact one’s life, and collaborative work on collective issues [8]. However, not all types of participation in tourism are equally beneficial for communities. In a strong sense, participation gives the real possibility of finding a common ground of relative equality with other stakeholders to decide on the development objectives of the community [9–12]. In the weak sense, participation is limited to taking part in planning and management activities but without any real possibility of influencing major decisions and outcomes [10]. According to this conception, participation fluctuates between two extremes: people either possess the power to influence decisions or are just spectators of the process.

In this context, the CBT has been focused on strong participation that involves community control over management and development of tourism [13–15], ownership and generation of direct financial benefits [16,17]. Goodwin and Santilli [18] note that the two most significant criteria used in the academic definitions of CBT are community ownership/management and community benefit. Although communities can receive benefits from participating in tourism without having direct control or ownership [5,19,20], these benefits are centred mostly on the provision of low-level employment for local people (e.g., [19]). Therefore, the high level of participation originally described by Arnstein [9] is what separates CBT from participation in conventional tourism. Tourism initiated and led by the communities is more likely to maximize the desired social and economic outcomes [2,16,21].

It should be noted that CBT development is often not something that can be easily decided by local people and then executed. It requires recognition from powerful, multi-dimensional, and in many instances, anti-participatory stakeholders that dominate lives or local people. The problem of power relations is central to the equitable and sustainable community-based tourism development [22–24]. Power relation is also an inseparable characteristic of policy design. Since policy formulation is
influenced by various actors, the characteristics of participants, their authority, power and the way they deal with and control each other will affect the final outcome [25,26].

Despite the involvement of many actors representing various interests, all policy-making can be considered political due to the overwhelming use of government authority [26]. Therefore, for communities to develop CBT a shift in balance between the powerful and the powerless is required [21], not only in terms of economic, psychological, and social power but also political power to drive CBT implementation [15,27] and influence public policy to support meaningful community involvement [28]. The latter can be achieved through partnership arrangements with community stakeholders. Although this sort of measures has some important disadvantages [29], the actors and the way they relate to each other influence perceptions of policy [30] formed through negotiation of interests and communication of knowledge [25]. In this way, a policy can be shaped and even renegotiated with those affected by it [31] which, in turn, increases its legitimacy. It should be further stressed that even after implementation, communication, and negotiation may trigger new rounds of policy-making [32]. The implication of these debates impacts the subsequent shape of the network of the actors, encouraging strategic learning, and in some cases affecting the power balance among those involved [25].

2. Materials and Methods

2.1. Framework for Policy Analysis

In order to create a framework capable of evaluating tourism policy documents from the perspective of their ability to foster CBT, a set of evaluation criteria were created based on factors that facilitate and constrain CBT in developing countries (Table 1). As previously noted, policies are designed to solve specific public problems; thus, only their acceptance by those affected can legitimize them. In contrast to a descriptive examination of policy documents’ content, it was believed that the real issues and enabling factors encountered by communities while implementing CBT will serve as a more adequate source for the design of evaluation criteria. In this vein, a comprehensive list of criteria was designed based on 77 factors that facilitate and inhibit CBT identified through a directed content analysis of 68 CBT case studies in natural areas of developing countries.

The collection of the case studies was carried out using a search engine that integrates 406 databases such as Taylor and Francis Journals, SpringerLink, Scopus, Science Direct, CABI, SAGE Journals, ProQuest, Oxford Journals, JSTOR, Wiley, Web of Science, and many more. The search was carried out using keywords ‘tourism’, ‘ecotourism’, ‘community’, ‘participation’, ‘barriers’, ‘success factors’, ‘limits’, ‘inhibitors’, ‘conditions’ and combination of keywords in ‘Article Title, Abstract, Keywords’. The snowball technique was used to identify additional references for case studies to a point that no new references were identified in all collected articles and books. These techniques generated over 300 potential cases for analysis. Sixty-eight cases were found that meet the selection criteria based on the definition of CBT by Spenceley [7] (p. 288):

(1) Located within a community (e.g., on communal land, or within community area of influence such as physical borders, land used by the community for subsistence and economic activities)

(2) Owned, managed, or co-managed by one or more community members (i.e., for the benefit of one or more community members)

(3) Be one initiative with central leadership structure (managing organization) that may include more sub-initiatives.
Table 1. Framework for policy document evaluation and factors used to create the criteria.

<table>
<thead>
<tr>
<th>Facilitators and Inhibitors (Barriers) for CBT</th>
<th>Fr.</th>
<th>%</th>
<th>Criteria for Policy Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Fundamentals of the principle of participation</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clear definition of the community</td>
<td>4</td>
<td>5.9</td>
<td>(A) Definitions</td>
</tr>
<tr>
<td>Involvement of community stakeholders in the tourism planning stage</td>
<td>15</td>
<td>22</td>
<td></td>
</tr>
<tr>
<td>Creation of a forum/network to facilitate mutual understanding and communication among stakeholders</td>
<td>9</td>
<td>13</td>
<td>(B) Availability of participatory instances</td>
</tr>
<tr>
<td>Local representation in the management of protected areas</td>
<td>3</td>
<td>4.4</td>
<td></td>
</tr>
<tr>
<td>No excessive formality and bureaucracy in the processes of community involvement</td>
<td>3</td>
<td>4.4</td>
<td>(C) Suitability of the participatory instance</td>
</tr>
<tr>
<td>2. Administrative governance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Political commitment to support community-based tourism</td>
<td>6</td>
<td>8.8</td>
<td>(A) Institutional coherence</td>
</tr>
<tr>
<td>Non-Overlapping jurisdiction of different agencies</td>
<td>3</td>
<td>4.4</td>
<td></td>
</tr>
<tr>
<td>Regulation enforcement</td>
<td>8</td>
<td>12</td>
<td>(B) Authority and institutional presence</td>
</tr>
<tr>
<td>Government interest in remote regions</td>
<td>3</td>
<td>4.4</td>
<td></td>
</tr>
<tr>
<td>Expertise among personnel</td>
<td>6</td>
<td>8.8</td>
<td></td>
</tr>
<tr>
<td>The roles and responsibilities of the community and partners are clearly defined</td>
<td>3</td>
<td>4.4</td>
<td>(C) Credibility and clarity</td>
</tr>
<tr>
<td>No corruption of government officials</td>
<td>3</td>
<td>4.4</td>
<td></td>
</tr>
<tr>
<td>3. Capacity development and assessment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Technical cooperation</td>
<td>53</td>
<td>78</td>
<td>All levels</td>
</tr>
<tr>
<td>Provision of capacity-building</td>
<td>41</td>
<td>60</td>
<td>All levels</td>
</tr>
<tr>
<td>Effective individual leadership</td>
<td>8</td>
<td>12</td>
<td>(A) Individual level</td>
</tr>
<tr>
<td>Skills and expertise in areas required for tourism</td>
<td>39</td>
<td>57</td>
<td></td>
</tr>
<tr>
<td>Presence of management structure</td>
<td>13</td>
<td>19</td>
<td>(B) Organizational level</td>
</tr>
<tr>
<td>Management skills</td>
<td>7</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>High level of participation in community organizations</td>
<td>6</td>
<td>8.8</td>
<td></td>
</tr>
<tr>
<td>Good management of funds</td>
<td>5</td>
<td>7.4</td>
<td></td>
</tr>
<tr>
<td>Consistent (non-fragmented) community organization</td>
<td>4</td>
<td>5.9</td>
<td></td>
</tr>
<tr>
<td>Marketing skills</td>
<td>3</td>
<td>4.4</td>
<td>(C) Political level</td>
</tr>
<tr>
<td>Fostering relationships between local and national/international experiences</td>
<td>5</td>
<td>7.4</td>
<td></td>
</tr>
<tr>
<td>Tourism leadership from within the community</td>
<td>4</td>
<td>5.9</td>
<td></td>
</tr>
<tr>
<td>No reliance on external actors to start and lead the initiative</td>
<td>3</td>
<td>4.4</td>
<td></td>
</tr>
<tr>
<td>4. Protection of community rights</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Independence in the decision making process</td>
<td>30</td>
<td>44</td>
<td>(A) Equity and equality</td>
</tr>
<tr>
<td>Healthy and equal relationship and coordination with institutions providing assistance</td>
<td>11</td>
<td>16</td>
<td></td>
</tr>
<tr>
<td>Clarity about tourism and its costs and benefits</td>
<td>10</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Dissemination of information about planned tourism development and related opportunities</td>
<td>7</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Primacy of local interests over private interests</td>
<td>5</td>
<td>7.4</td>
<td></td>
</tr>
<tr>
<td>Primacy of local interests over external interests</td>
<td>4</td>
<td>5.9</td>
<td></td>
</tr>
<tr>
<td>Tourism based on traditions and local customs that attract tourists and strengthen the role of the community</td>
<td>22</td>
<td>32</td>
<td></td>
</tr>
<tr>
<td>Recognition of the importance of community participation</td>
<td>10</td>
<td>15</td>
<td>(B) Culture</td>
</tr>
<tr>
<td>Strict community norms and rules that are enforced</td>
<td>6</td>
<td>8.8</td>
<td></td>
</tr>
<tr>
<td>Respect for local traditions, community leadership and traditional authorities</td>
<td>2</td>
<td>2.9</td>
<td></td>
</tr>
</tbody>
</table>
The aim of content analysis was to identify the basic, non-overlapping (mutually exclusive) units of analysis (called factors in this paper). At this first level of coding, distinct concepts in the data namely facilitators and inhibitors (barriers) for CBT formed the basic units for the analysis. The objective was to compare across texts to see whether or not certain themes occur. The initial analysis of the case studies was to extract chunks of text that describe factors or conditions that inhibit CBT or played the role of barriers. The research was carried according to the 10-steps methodology by Mayring [33], with two additional steps added more recently by Assarroudi et al. [34]. Content analysis has been previously used in tourism studies to analyse interviews’ [35,36], as well as the content of published papers [37–41].

To validate the role of the selected factors for CBT initiatives, construct validity was tested using multiple sources of information from the available literature. In this way, a coding scheme was developed that is composed of a definition of each factor of analysis used for coding and a description of its impact on the success or failure of a CBT initiative based on the literature. Its objective was to narrow down the degree of interpretation by various coders.

To increase the level of coding reliability, reproducibility was maximized through creating data sheets for each case study to increase the probability of other researchers applying the same process of analysis using the same coding scheme and data to reproduce the same results. Two coders worked independently on the content analysis. Intercoder reliability was determined as 0.93. Factors assigned by both researchers in different categories were further evaluated by an additional researcher and finally
categorized based on a statistical majority. The presence of factors in the case studies was presented through frequencies (Table 1). In total, 77 factors were found in 68 case studies (Supplementary). Not all factors identified in case studies were considered suitable for policy analysis. Twenty out of 77 were too specific to be considered applicable.

2.2. Colombian Policies

In order to draw a complete picture, all current policy documents that have no determined life span were selected for the evaluation. Hence, national and regional development plans were excluded from the analysis. Currently there are seven national policy documents that apply to community-based tourism and community participation in tourism development in natural areas: General Tourism Act §300 (1996); Act §1101 (2006); Act §1558 (2012); The Ecotourism Development Policy [42]; Community-based Tourism Development Policy [43]; The Sectorial Tourism Policy CONPES 3397 [44]; The guidelines to promote private participation in the provision of ecotourism services in National Parks, CONPES 3296 [45].

General Tourism Act §300 (1996) is the main document that applies nationally, which gives legal basis to many aspects of the tourism industry in Colombia. The document is divided into thematic chapters that encompass the following areas: national and sectoral tourism planning; tourism development areas and tourism resources; alternative types of tourism such as ecotourism, ethnotourism, agrotourism, and urban tourism; tourism marketing and international cooperation in tourism; national tourism registry; regulatory basis for tourism enterprises, such as hotels, tour operators, transportation companies, and hospitality establishments.

Acts §1101 (2006) and §1558 (2012) modify Act §300, hence, all three are analysed together. The former emphasizes the economic component of the policy. It also highlights the industrial character of tourism, introducing a new tax that applies to tour operators and benefits territorial entities and industrial consortia. The latter adds to the principle of public consultation included in Act §300 (1996) the requirement of prior informed consent from the communities in decision-making processes in circumstances that require it. It also stresses the principle of institutional coordination and creates an advisory board for the tourism industry.

The ecotourism development policy [42] and guidelines community-based tourism development policy [46] are not legally established Acts, but policies that guide the development of specialized types of tourism by providing various strategies to be included in local and regional tourism development plans. Because they were designed specifically to foster the involvement of communities in tourism in natural and remote areas, they are subject of the analysis. They emphasize linking community stakeholders to plans and programs in natural areas with potential for the tourism development. It should be noted that while the ecotourism policy is a fully developed policy, the community-based tourism policy is a guideline that is yet to be officially adopted.

The Sectorial Tourism Policy CONPES 3397 [47] gives a basis for the development of tourism plans. The policy identifies the weaknesses of the tourism industry in Colombia and proposes strategies to foster tourism development that include institutional strengthening, tourist safety, marketing, tourism supply, the sustainability of cultural and natural heritage, and improvement of information systems.

The guidelines to promote private participation in the provision of ecotourism services in National Parks, CONPES 3296 [45], is a policy specifically designed to attract high-calibre investors to develop ecotourism in protected areas of Colombia. It identifies characteristics of ecotourism in PAs, limitations that National Park authorities face in the management of tourism, and strategies to attract and involve private investors in management. This specific policy was selected because it regulates who, and on what conditions, can develop and manage tourism in PA.

2.3. Framework Application

The 57 factors that facilitate and inhibit CBT initiatives in developing countries identified previously (Table 2, left column), were used to create the policy evaluation framework (Table 2, right column).
For the ease of presentation, the facilitators and corresponding inhibitors (barriers), were all converted into facilitators. Since the policies could not be analysed against 57 factors that were often too specific to be identified in policy documents, the following step was to transform the 57 factors into more manageable 15 categories that integrate all factors. Although broader categories of analysis were created, their content closely corresponds with the original factors they describe (See numeral 3.1.). Finally, aspects typically found in policy evaluation studies related to the clarity of definitions required in policy documents were added to the framework.

### Table 2. Compliance of the Colombian policy documents with items of the framework.

<table>
<thead>
<tr>
<th></th>
<th>I</th>
<th>II</th>
<th>III</th>
<th>IV</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Fundamentals of the participation principle</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(A) Definition of participation</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>(B) Existence of participatory instances</td>
<td>1</td>
<td>3</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>(C) Suitability of the participatory instances</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td><strong>2. Administrative governance</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(A) Institutional coherence</td>
<td>1</td>
<td>3</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>(B) Authority and institutional presence</td>
<td>3</td>
<td>1</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>(C) Credibility and clarity</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td><strong>3. Capacity development and assessment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(A) Individual level</td>
<td>1</td>
<td>3</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>(B) Organizational Level</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>(C) Political Level</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>4. Protection of community rights</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(A) Equity and equality</td>
<td>1</td>
<td>2</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>(B) Culture</td>
<td>3</td>
<td>2</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>(C) Territory</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>5. Distribution of benefits</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(A) Social/Community</td>
<td>1</td>
<td>2</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>(B) Economic</td>
<td>3</td>
<td>2</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>(C) Environmental</td>
<td>3</td>
<td>3</td>
<td>2</td>
<td>3</td>
</tr>
</tbody>
</table>

(0) Absent: Lack of any reference to the aspect; (1) Restricted/limited: It is included but reference excludes community stakeholders and favours other stakeholders, or it is included, but its scope is very limited; (2) Undeveloped statement: A statement without any substance to support it; (3) Present: It is present and clearly defined, and applicable to all stakeholders

<table>
<thead>
<tr>
<th>I</th>
<th>II</th>
<th>III</th>
<th>IV</th>
</tr>
</thead>
</table>
| I—General Tourism Act §300 1996 and modifying acts; II—Ecotourism Development Policy [42] and Community-based Tourism Development Policy [43]; III—The Sectorial Tourism Policy CONPES 3397 [47]; IV—Guidelines to promote private participation in the provision of ecotourism services in National Parks CONPES 3296 [45].

A definition of each category was created that would serve as a coding scheme for the content analysis of policy documents. Its objective was to narrow down the degree of interpretation by various coders. Each category was then assigned one of four possible levels of compliance. In addition to presence and absence, intermediate levels indicating partial compliance were created. Compliance was considered “restricted/limited” whether (A) a policy document made a reference to a specific aspect, but excluded community stakeholders and/or favoured other stakeholders, or (B) when the scope of a policy was limited to provide partial compliance with the requirements. For example, when policy described the distribution of economic benefits only in terms of generation of low paid employment or when capacity development made reference only to training in tourism, customer service, and foreign languages, ignoring illiteracy issues, leadership development, and project formulation. “Undeveloped statement” was a statement without any substance to support it, usually contended in one sentence using the expression “should be” to indicate an action, state, or result to be achieved without providing any additional details or mechanisms to achieve them.

To increase the reliability of coding, a detailed description of each category were used by three researchers that independently categorized the content of policy documents (example in Appendix A).
The agreement of at least two researchers was required. This method introduces a certain level of subjectivity that has to be acknowledged. However, because there were only four clearly distinguishable levels of compliance or non-compliance with the criteria, not a single case of disagreement by more than one researcher was reported.

3. Results


Table 1 shows the categories of the framework used for policy evaluation (right column) and corresponding factors identified through content analysis of case studies (left column) that they were based on. The factors originally are represented by facilitators and corresponding inhibitors (barriers) for CBT, but for the ease of presentation, they were all converted into facilitators. Additionally, the table presents the frequency and percentage of occurrence of these factors in 68 case studies previously analysed that provides some information on their potential importance. The factors with the highest percentage of occurrence are the ones that policy documents should address as they are the major obstacles or facilitators in CBT development and management. The framework is composed of five principle criteria and 15 sub-criteria briefly described below.

3.1.1. Fundamentals of the Principle of Participation

(A) Definitions: Defining the concept makes it possible to start from a minimum initial agreement on what does and does not constitute a community and participation. While it is not enough to just define the concepts, the fact that a policy does not provide basic explanation indicates its weakness in this respect.

(B) Availability of participatory instances: This refers to mechanisms or legal procedures available for citizens or communities, through which they can participate in a meaningful way reaching the higher levels of participation that correspond with characteristics of CBT described in this paper. The factors provided in Table 1 give few examples of instances that were identified to be effective in strengthening participation, at the same time giving the community a possibility to voice their concerns and enabling them to have a real effect on decision-making.

(C) Suitability of the participatory instances: The instances for participation should allow for a meaningful level (ladder of participation) of engagement in the process, in a way that is understandable for the communities and not excessively formal and bureaucratic, providing the ability to influence decisions that have an impact on communities’ livelihoods.

3.1.2. Administrative Governance

UNDP [48] (p. 1) defines administrative governance as “the system for the implementation of policies, which requires the existence of well-functioning organizations at central and local levels”. In the case of involving communities in tourism programs, its appropriate operation should include the following:

(A) Institutional coherence: This is manifested in the clear allocation of responsibilities and jurisdictions, which ensures that the community does not receive misleading guidelines from the authorities involved, which is often the case in developing countries [49,50]. Conflicting guidelines may be provided by an entity whose institutional role is the sustainable management of the area and by a tourism promotion organization whose interest is more economic. In cases where there is a disjointed power structure among government departments, the local coordination is affected resulting in fragmented planning, failure of tourism program implementation, and weak tourism regulation within tourist destinations [51].

(B) Authority and institutional presence: This refers to the exercise of authority, a major issue for communities in protected areas affected by public order issues because their participation depends on the protection of their right to participate. Public order issues are a factor especially relevant in
the case of Colombia that only recently saw an end to a long civil war. It also manifests itself in the institutional presence, including peripheral regions, that accompanies and supports community actions in certain areas. Peripherality is a common issue for many remote communities not only to access the markets but even to gain local government’s interest and financial and administrative support [52]. It is also a factor in national-level policy development that more often than not suit the areas of primary concern for the national government and are often unaligned with the needs and priorities of distant communities [53].

(C) Credibility and clarity: The arrangements negotiated with the communities should be enforced, including an understanding of, and agreement on the rights and duties of the parties involved [54]. They also include effective support for the organization of meetings and capacity-building requested by the communities or offered by institutions and intermediary entities relevant to the success of the initiatives. Any failure to comply with the agreements affects, in the long-term, any interest in participating.

3.1.3. Capacity Development and Assessment

The criterion of assessment refers to the recognition of prior knowledge that is optimized and channelled to specific purposes through strengthening exercises. This not only creates the possibility of participating but also allows communities to participate in a more meaningful way. Three levels of capacity-building that facilitate participation can be distinguished:

(A) Individual level: This refers to the knowledge, skills, and abilities of an individual. Traditional knowledge about the culture, territory, and the relationship with nature is also valued.

(B) Organizational level: This includes procedures and frameworks that facilitate the consolidation of the communities into organizations able to work together toward common goals. As noted by Tosun [8], because of the lack of effective grassroots organizations, communities are susceptible to manipulation by governmental organizations and other, more powerful private stakeholders. At this organizational level, solidarity is evaluated and the main objectives are strengthening local networks and entrepreneurship, and building capacities in areas, such as accounting management, project management, and development of business plans and partnerships.

(C) Political level: This refers to actions that go beyond the power of the individual, to a broader context: knowledge about rights and duties, leadership, empowerment, self-management, and community participation.

3.1.4. Protection of Community Rights

This refers to the guarantee of the rights of communities, both as groups and as individuals. Failure to ensure these rights is perhaps the most common factor that causes dissatisfaction among communities and generates conflict with institutions, apathy, and a lack of trust in proposed initiatives. This factor is directly related to the availability of regulatory mechanisms in the policy documents that are designed to identify community rights and to ensure their protection, even at the cost of withdrawal from tourism development. Protection of rights can be grouped into three types:

(A) Equity and equality: These aspects apply especially in areas such as access to clear and truthful information and prior consultation with local and ethnic communities. It is equally important to set up actions in favour of the communities so that they can develop CBT and be involved in tourism with the same or similar level of power as other stakeholders and to eliminate or reduce vulnerabilities. According to Willis [55] and Sofield [56], the transfer of power and, in consequence, the empowerment, is one of the key elements for successful community participation. This applies especially in contractual relations that generate vertical power differences and in some cases the dominance of economically and politically stronger stakeholders [57]. The control over important information is another example of power relations that allows certain groups to benefits at the cost of local communities [58].

(B) Culture: This is closely associated with the education and social integration of a group, allowing its cohesion and survival. Understanding and respecting the cultural differences and
subjective perceptions of communities are criteria that must be included in the policy as a strategy for reducing conflict and as an intrinsic element of eco-touristic value. The community should be able to collectively define what values will not be compromised for the sake of growth [59]. The community norms and rules should be respected and strategies based on local culture and heritage that strengthen the role of the community should be underlined [54].

(C) Territory: Place attachment is one of the principal notions that drives community action and ultimately fosters community development and sustainable resource management [60]. The aspects that link the territory with the idiosyncrasies of communities must be understood and respected. Understanding the attachment residents hold for a park can improve management, intensify the tourist experience, and facilitate communication between stakeholders [61]. The rights of communities to their territory and its traditional use must be recognized and respected even if they do not want to be part of proposed initiatives. Although sometimes communities can participate in CBT initiatives in the absence of secure land tenure (as is the case of many PAs) [28], their rights to the land use should be recognized and prioritized.

3.1.5. Distribution of Benefits

The Convention on Biological Diversity set the stage for the international recognition of the rights of local and indigenous communities to benefits derived from the use of biodiversity [62]. Lack of equity in the distribution of benefits generates discontent in communities that stand in opposition to proposed projects or which participate under imposed conditions but rarely turn to the state to protect their rights. It has to be noted that the definition of benefits varies according to the criteria applied by each stakeholder. In reality, they are measured by standards defined by the dominant force and are hardly negotiable, so benefits should be determined in the process of consensus building to reach understanding and agreement on the most appropriate form of tourism [63]. The following categories of benefits can be defined:

(A) Social/community benefits: Participatory tourism such as CBT should be framed within the local cultural and social circumstances and not vice versa. To communities, the economic benefit is a tangible and primary motivation. However, participation in decision-making is the major route to empowerment because it is directly linked to the discussion about types of development at the local level [54]. Empowerment and shared responsibility, therefore, involve the consolidation of social strength, building confidence in the communities’ own abilities and pride about culture [15]. As a result, communities shift their interests from the personal to the communal building community agency that increase the adaptive capacity of people to manage, utilize, and enhance available resources to deal with local issues [64].

(B) Economic benefits: Nature-based CBT or ecotourism in natural areas can generate economic benefits, and it is the policy that determines which of these benefits reach communities and contribute to their welfare. However, it is not always easy to determine what in a policy content is considered to be a benefit because it depends on the point of view of the stakeholders involved. From the perspective of the institutions and private concessionaires, the benefits expected by the community range from being hired as employees of a private concessionaire (interpreters, guides, or operatives) to selling own products to visitors, paying a commission from sales to the concessionaire. Under these circumstances of weak participation and lack of support for CBT development, community interest in tourism is often weak. The external actors are also better equipped than the communities in knowledge about markets, tourism in general, and they are focused on financial benefits, marginalizing locals from organized participation in tourism [65].

(C) Environmental benefits: The conservation and sustainable use of natural resources are requirements for long-term maintenance of nature-based tourism and ecotourism and are the main benefits most frequently mentioned by the communities. The incursion of foreign stakeholders adopting a purely economic perspective not only creates a threat to the ecosystemic stability of the areas but also vulnerabilities for local residents who will face potential problems caused by the misuse of
resources when the concessionaires leave the area in favour of new, pristine destinations [66]. In many cases the ad hoc nature of tourism planning has allowed outside investors to seize opportunities on communal land [67], sometimes using government control to purchase land used by local residents at low prices [58]. This is a factor that limits the possibility to develop CBT.

3.2. Application of the Framework

Colombia, officially the Republic of Colombia, has not been passive in the face of the global rise of tourism that carries the potential for the development and generation of wealth through income for local communities. In consequence, various policies have been designed to promote CBT and participative approaches to ecotourism, cultural tourism, and nature-based tourism. These policies, together with general tourism policies form the subject of the evaluation (Act §300 1996, Act §1101 2006, Act §1558 2012, CONPES 3397 [42,43,45,47]). The criteria previously defined constitute an evaluative framework for Colombia’s public policy documents. The results of the evaluation are shown in Table 2. For the ease of presentation, Roman numerals are used for the following documents: I-General Tourism Act §300 1996 with modifying acts §1101 and §1558; II-Ecotourism Development Policy [42] and Community-based Tourism Development Policy [43]; III-The Sectorial Tourism Policy CONPES 3397 [47]; IV-Guidelines to promote private participation in the provision of ecotourism services in National Parks CONPES 3296 [45]. The framework allows for the assessment of the documents prior to their implementation. Although this approach has the weakness of assessing the content of policy documents, not the results, it is the policy that should clearly guide and regulate the process to be pursued and to create a background for inclusive CBT.


1. Fundamentals of the Participation Principle

(A) The policy does not include participation within its principles and therefore does not define it.
(B) The policy creates so-called “Supreme Tourism Council”, “Tourism Consultative Council”, and the “Microenterprise and Small and Medium Enterprise Council”, all of which include representatives of private operators only.
(C) It limits the social development generated by tourism to commercial benefits. It mentions private operators and organized commercial unions without specific reference to possibility of community organizations becoming providers of tourist services. Moreover, the participation of private stakeholders in the “Supreme Council” was eliminated by the modifying Act §1558, which determined that the council will be composed exclusively of representatives of public institutions.

2. Administrative Governance

(A) The policy consecrates the principle of “coordination” and creates the “Tourism Consultative Council” to comply with this principle in the actions of public entities in the tourism sector. The effectiveness of this guideline is limited because it affects the institutional coherence by indicating that jurisdiction over ecotourism development projects is shared between the Ministry of the Environment and the Ministry of Economic Development. Since the function of the former is conservation and of the latter is economic development, it is very difficult to generate coherent guidelines and strategies. In consequence, confusing or contradictory directions are taken that cause conflicts of jurisdiction, which directly impact the communities.
(B) It contemplates a component of protection measures that may benefit communities through five strategies: (1) Control and crime prevention in tourism companies; (2) Surveillance of attractions and tourist activities; (3) Strengthening of information and tourist awareness; (4) Strengthening of the tourism police; and (5) Tourism safety network. At the same time, Act §1558 creates the “National Tourism Security Council”.
The Act establishes the principle of “agreement”, according to which the decisions and activities concerning the tourism industry are to be disseminated in agreements to assume the responsibilities, efforts and resources of different stakeholders involved. While it is considered that such a principle is a valid way to generate credibility and clarity in the processes, it is considered that this must imply a process of dialogue, implicit in the community participation, and not only dissemination or communication required by the law.

3. Capacity Development and Assessment

(A) The policy emphasizes the importance of training for providers of tourism services through educational programs in tourism offered by the national capacity-building and education service (SENA). It does not indicate support for individual members of the communities that wish to participate, nor does it include any reference to recognition and use of traditional knowledge in the training.

(B) The Act makes a reference to this factor in the section regarding the training in business, but it refers specifically to operators in the tourism sector (enterprises, micro-enterprises, unions) and not to service providers—a category that includes the communities.

(C) The policy does not make any reference to this factor.

4. Protection of Community Rights

(A) The policy assign greater importance to the action of companies and unions than to that of the community, categorizing them by the criterion of economic investment capacity. The differentiation between tourism operators (private companies) and providers of tourism services (communities) tacitly places communities in a position of dependence, fostering the weak and instrumental participation. That, in turn, limits the exercise of their rights when confronting stakeholders with greater decision making power.

(B) It explicitly includes cultural values as tourist attractions and affirms that tourism contributes to the revaluation of the cultural identity of the communities. When referring to agrotourism and ethnotourism, it indicates the obligation of the state to ensure that the plans and programs that promote these types of tourism contemplate respect for the social and cultural values of rural and ethnic communities due to their vulnerability.

(C) The act defines public tourism resources as those urban or rural areas, squares, roads, monuments, buildings and other assets that the Ministry of Economic Development considers acquiring by the State, preserving, or restoring to be used for tourism. The only safeguard provided by the law to preserve the right to oppose this declaration is the so-called “previous consultation” that is applicable for Indigenous and Afro-Colombian communities, excluding rural communities that may be affected by tourism development projects in their territory.

5. Distribution of Benefits

(A) The policy determines various incentives such as the VAT refund and a tax on tour operators and foreign tourists that spend money inside the national territory. Moreover, a tourism toll collection is established that destines resources to the local municipality for cleaning and management of tourist sites.

(B) It makes specific reference to agrotourism and ecotourism activities in general that must generate income for the rural communities and for those that live near protected areas. The Act destines 70% of the timber tax to social investment programs through tourism competitiveness projects for vulnerable communities.

(C) The Act indicates that the development of ecotourism activities should generate income for support and promotion of conservation of natural areas, and follow the principle of sustainable development.
3.2.2. Ecotourism Development Policy and Guidelines for Community-based Tourism

Development Policy

1. Fundamentals of the Participation Principle

(A) The policies define the principle of participation with its following functions: adequate and equitable resolution of potential conflicts, recognition of diverse organizational forms, and incorporation of the expectations of local and regional stakeholders. It proposes that the development of ecotourism should promote the strengthening of mechanisms and opportunities for social participation of all stakeholders, including local communities.

(B) The documents indicate that it is essential to promote the integration of communities in planning, project management and development of tourism, pointing to tourism MSMEs as an efficient mechanism for participation in the provision of tourism services. The policies announce creation of the National Inter-Institutional Ecotourism Committee of Colombia (CINEC), which is made up of public and private actors.

(C) The participation in the management of ecotourism projects in the areas identified in the policy as essential has been implemented in some protected areas. The communities are not required to form MSMEs, which weakens their organizational consolidation. The instances of participation that the Policy contemplates for the communities are centred in the provision of services rather than in planning and management. It promotes an instrumental and operational participation, excluding scenarios of community decision-making.

2. Administrative Governance

(A) The policies indicate the principle of “coordination” to guide the implementation of the policy actions by public and private actors, which contributes to the coherence of the actions by avoiding isolated actions that can generate conflicts.

(B) The documents include a strategy that identifies and describes the functions of different institutional stakeholders, including actions to guarantee access to tourist destinations and visitor safety.

(C) The policies point out the importance of linking communities in the management and planning stages, but at the same time indicates the decisive role of local stakeholders in the process of managing ecotourism services. For this reason, the policies lose credibility and do not allow to clearly understand the institutional objectives. The emphasis is given in the instrumental level of provision of services and not in the tourism planning. Finally, the objective of strengthening communities through tourism MSMEs is provided in a form of advice without reference to concrete strategies.

3. Capacity Development and Assessment

(A) The policy includes strategies for training and awareness building of regional and local stakeholders and promotes the design of curricula for technical and professional education of rural communities for the provision of ecotourism services.

(B) The documents dedicate various strategies to strengthening business capabilities of grassroots organizations for provision of tourism services. They point out the importance of giving support to local communities to consolidate them in companies or associations, enabling them to participate in the productive chain. They also provide strategies to ensure the financial sustainability of projects and to strengthen local management capacity, and allocate resources from the Ministry of Commerce, Industry, and Tourism for micro, small, and medium enterprises.

(C) There is no reference to this factor.

4. Protection of Community Rights
(A) The only reference indicates that the providers of services must strengthen themselves in the defence of their rights against more powerful stakeholders. However, there is a lack of clarity on the mechanisms that can support such strengthening from the policy’s action framework. Moreover, the inequality is evident between large tourism operators with economic capacity and communities that are indicated as service providers. The policies propose to strengthen communities through credits, failing to recognize that financial insurance and economic and political advantages are only available to private operators.

(B) The policies recognize that tourism projects with communities can only be successful and viable in the long term if their design takes into account the respect for cultural identities and complements scientific knowledge with traditional wisdom. However, the capacity-building strategies embrace a unidirectional approach because they perceive the community only as a recipient of knowledge that the institutions consider important. The policies include strategies for monitoring programs to minimize and correct negative environmental impacts, but they fail to include social and cultural impacts.

(C) The only reference to this factor indicates that the decisions taken must be linked to the land use issues, for which the policies propose strategies for planning of protected areas. This process privileges the territorial planning, designed and implemented by institutional stakeholders. It fails, however, to clarify that in the case of rural or ethnic communities that inhabit protected areas, prior consultation is required, which guarantees the right of said communities to take part in the decisions that involve actions on their territory.

5. Distribution of Benefits

(A) The ecotourism policy tacitly refers to this benefit by indicating that its general objective is to strengthen and diversify the tourism activity as a way to guarantee the rational use of natural resources and the improvement of the quality of life of the inhabitants. This is achieved through the “Green Employment” programme, which provides communities with opportunities to be linked to the provision of various specialized services and development of sustainable productive projects.

(B) The policies indicate that in order to improve the quality of life of the inhabitants, it is essential to optimize equitable access to the benefits derived from the influx of tourists to the tourism areas. The text indicated that management schemes should be designed to channel resources generated by ecotourism to conservation, maintenance, and recovery of tourist attractions, omitting communities and their tourism products based on local culture as beneficiaries.

(C) The guidelines previously mentioned equally apply to this factor. The management schemes should allow part of the resources generated by ecotourism to be dedicated to conservation, strengthening, and diversification of the ecotourism activity.

3.2.3. The Sectorial Tourism Policy CONPES 3397

1. Fundamentals of the participation principle

(A) The policy does not define community participation but mentions it as a possible strategy.

(B) The policy emphasizes two instances of participation: (1) the institutional program of rural accommodations was designed to improve the quality of life of families located in rural areas and it consists of supporting families to convert their homes to accommodate tourists; (2) opportunities for capacity-building.

(C) The program of rural accommodation offers weak participation, centred in provision of services but not in the design, planning or decision-making. Hence, its contribution to empowerment of communities to consolidate themselves as tourism operators is not clear. While tourism operators receive major government support and can benefit from the national tourism fund, service providers (communities) cannot.

2. Administrative Governance
(A) The policy includes aspects of institutional strengthening indicating that a perfectly coordinated and articulated institutional framework is an indispensable condition to consolidate the tourism sector. It describes in detail the institutions, their functions, and competences.

(B) It considers the security and the public order as a transversal factor of institutional action, noting that the insecurity not only hinders the development of the sector but also affects the perception of the country abroad. It proposes the design of a Tourism Security Plan for travellers. At the same time, it creates regional security councils composed of various stakeholders. These actions are complemented by the programs: “road safety” and “security in tourist destinations”.

(C) It is considered that the policy presents and develops in an appropriate way the items referring to institutional coherence and clarity, showing high level of credibility and clarity of the institutional stakeholders that positively influence the linkage of communities in the tourism activity.

3. Capacity Development and Assessment

(A) The policy proposes a capacity-building strategy through the program called “Friendly Schools of Tourism”, which seeks to develop tourism culture from the early years of education.

(B) The policy states that the Ministry of Commerce, Industry, and Tourism must create training programs for entrepreneurs in administration and management that foster awareness about legal matters, and strengthen tourism MSMEs. As in the case of previously described policies, CONPES 3379 differentiate tourism operators (investors with capital) and service providers (communities), excluding the latter from receiving training.

(C) The policy does not make any reference to this aspect.

4. Protection of Community Rights

(A) The policy only points out the need to create forums where all types of stakeholders can be heard and their different points of view and interests respected.

(B) The document indicates that culture is a consumer good of the first order and an asset as well as a tourism attraction. It contemplates a work plan in which conservation of cultural and natural heritage and tourism development become complementary. It is striking, however, that when referring to the regulatory instruments, it only names sectoral plans for tourism, ignoring the “life plans of the indigenous communities”.

(C) The policy does not make any reference to this aspect.

5. Distribution of benefits

(A) The policy does not make any reference to this aspect.

(B) The policy does not make any reference to this aspect.

(C) The document indicates that natural areas are tourist attractions that should be protected and recovered so that their use as tourism assets is sustainable.

3.2.4. The Guidelines to Promote Private Participation in the Provision of Ecotourism Services in National Parks, CONPES 3296

1. Fundamentals of the Participation Principle

(A) The policy does not include this factor, therefore, it does not define it. However, it develops it through the scheme of private participation in the provision of ecotourism services in protected areas.

(B) The policy focuses mainly on the concession of ecotourism services through participation of private tourism operators in public bidding. It tacitly refers to participatory instances for other stakeholders, stating that the State should encourage participation of indigenous, Afro-Colombian, and rural communities in the processes of planning, promoting the linkages of the communities in the development of ecotourism activities in partnership with private operators.
The expectations created by the policy about the new source of economic resources entering PA are clearly directed towards private concessionaires. This is evident by analysing the economic capacity requirement, created to promote competition among suitable bidders. Under this scheme, communities are service providers and employees of the concessionaires under vertical and dependent relationship with minimum or no possibilities of influencing decisions.

2. Administrative Governance

(A) While the main objective of private concessionaires is mainly economic, the environmental authority prioritizes the conservation of the area. At some point these two contradictory interests will collide, giving rise to disputes generating contradictory actions that affect the institutional coherence and the relationship with the communities. The policy does not provide any framework to accommodate competing interests and resolve conflicts.

(B) The presence of two stakeholders with the decision-making, management and administrational power can lead to dilution or concentration of authority in the benefit of one of the two stakeholders, despite the policy stating that the concession does not delegate institutional functions.

(C) The communities are under jurisdiction of two stakeholders with potentially conflicting interests and may be forced to follow two different directions.

3. Capacity Development and Assessment

(A) The policy does not make any reference to this aspect.

(B) The document enunciates promotion of sustainable development in the regions, with special emphasis on communities and grassroots organizations, and the formation of partnerships with local community organizations for the provision of services as a strategy to improve private participation in ecotourism in protected areas.

(C) The policy does not make any reference to this aspect.

4. Protection of Community Rights

(A) The policy does not make reference to the issue of the rights of ethnic communities that share territory with protected areas. In cases where there is presence of these communities, the Policy leaves open space for violation of the rights of vulnerable communities that are protected only by the rule of “prior consultation”. Moreover, the document does not contemplate aspects that may facilitate the defence of community rights in cases of abuse by the dominant position of concessionaires.

(B) The policy does not make any reference to this aspect.

(C) The policy does not make any reference to this aspect.

5. Distribution of Benefits

(A) One of the principles of the policy is promotion of sustainable development, according to which the implementation of private participation schemes should stimulate local and regional development through direct or indirect linkages with the surrounding communities, which generates employment and supports development of complementary community services.

(B) The policy does not make any reference to this aspect.

(C) It is indicated that the policy must contribute with financial sustainability for the management and conservation of the protected area, given that the expected resources should be destined primarily to conservation and be greater than those currently assigned by the environmental authority to the conservation of the PA in question.
4. Discussion and Conclusions

In the face of almost a complete lack of studies that evaluate tourism policy outputs [6], this paper contributes to the methodological debate by proposing a framework capable of highlighting weak and strong aspects of policy design in terms of providing mechanisms that facilitate or guarantee compliance with criteria that foster CBT. The framework can serve as a guideline for policy-makers and scholars to design more inclusive policies and to compare the performance of policy documents in this respect. It is based on factors that facilitate and inhibit CBT in natural areas of developing countries, thus its main limitation is its restricted geographic application. Additional studies are needed to identify whether the factors are similar for developing and developed nations.

Looking at Colombian policies, the instrument proposed in this paper for the analysis highlighted their weak and strong aspects in relation with community participation and CBT development. The Colombian Ecotourism and CBT policies [42,43] present the highest level of compliance with the items of the framework, while CONPES 3296 [45] effectively restrains community participation and CBT in protected areas. Although the involvement of local communities is outlined as an explicit action in all the instruments examined, their design has many structural limitations on participation. The weakest aspects of all policies analysed are definition of participation, political level of capacity development, and protection of community right related to their territory.

Even the policies that were designed specifically to foster the involvement of communities in tourism in natural and remote areas (The ecotourism development policy [42] and community-based tourism development policy [43]) are weak in aforementioned aspects that affect their capacity and possibility to control tourism, especially in protected and natural areas. In theory, these two policies lay the foundation for a meaningful level of participation. In reality, however, they have some of the same limitations encountered in other policies. The problem is rooted in the fact that the policy institutionally assigns leadership of tourism programs to the protected area authority while simultaneously requiring that the authority should meet tourism guidelines provided by the Ministry of Commerce, Industry, and Tourism. This issue is further complicated when concessionaires try to exert their contractual rights over tourism activity in the area. With three stakeholders executing their conflicting agendas, governance is compromised.

None of the seven policy documents defines the community and the principle of participation. In all documents, the participation itself takes the shape of a recommendation to involve local communities through employment opportunities. There is no reference to the need to involve communities in the policy design stage or to empower communities to manage or co-manage development through CBT. In this way, a legal but not democratic legitimacy is created. The latter can only be possible when the governed communities have participated in the elaboration of the rules that govern them and they accept them as just [4]. The instances of participation are considered weak and largely unsuitable in four policy documents because they do not involve all the parties that may be affected by or may benefit from the decisions made about the use and exploitation of natural resources for tourism. Moreover, they are far from being the tools that they are claimed to be by the policies, namely, for empowerment that sparks long-term local development. For communities trying to develop CBT, it is an important limitation that disjoins their plans for local development from plans set by external stakeholders.

In terms of administrative governance, the framework analysis shows mixed results. Only the Ecotourism and CBT development policies comply with all three factors of analysis (institutional coherence, authority and institutional presence, credibility and clarity). The institutional presence is clear in two policies (Act 300 with modifying acts and CONPES 3397) because of the function assigned to government institutions in preserving the natural areas and managing the tourism sector. However, this has become an obstacle to empowerment, even in cases where communities are involved in programs. This is mainly because the policy framework controls all aspects of tourism activity in natural areas. On the one hand, this shows the diversity of approaches, which are sometimes contradictory. On the other hand, it does not allow for the appropriation of benefits through self-management schemes that would contribute to the consolidation of organizational processes.
The strengthening of communities and capacity-building also feature rather weakly in the policies analysed. Although some documents stress the importance of capacity-building in local populations, except two policy documents, they do not recognize communities’ their traditional knowledge. Some policies specify relevant training in project formulation, but they do not intend to solve basic shortcomings such as literacy and low self-esteem, which are solutions required before members of local communities can understand and assimilate the training provided [66]. Participation is just the first step to empowerment that should give the individuals or groups the ability to exert control over factors that affect their lives. Although common themes of capacity-building programs such as gastronomy, guiding, and foreign languages are important, they are preparing community members to be better employees and do not contribute to improving communities’ position as an organization able to develop CBT and do not reduce their vulnerability to other stakeholders. It should be also highlighted that none of the policy instruments includes the political level of capacity-building, which is considered to be directly related to the limitations of the participation instances observed and it introduces limitations to the protection of community rights. Although the document briefly recognize that communities should be strengthened in defence of their rights against more powerful stakeholders, they do not identify mechanisms to achieve it.

Protection of community rights has been identified by the analysis framework to be one of the weakest aspect of all seven policies. The instrumental type of participation predominates in all policies analysed over types of participation that empower communities to participate in decision-making and defence of their rights. This result points to a structural weakness in the participatory component of the policies as it directly affects their organizational consolidation by keeping them in a constant position of subordination. The differentiation between tourism operators (private companies) and providers of tourism services (communities) found in all analysed policies tacitly places communities in a position of dependence, limiting the exercise of their rights when confronting stakeholders with greater decision making power.

The results of the case study contribute to current debates by identifying challenges faced by Colombian tourism policies that, although were designed to meet specific objectives, turned out to be weak in providing mechanisms to achieve them. A good understanding of the factors that inhibit and facilitate CBT is a key aspect for designing policies that are effective in fostering it. Policy documents that regulate relatively new branches of sustainable tourism are based on general principles and guidelines that refer to phenomena that are not fully understood by policy-makers. This can be seen clearly from the contrast between the ambitious and somewhat idealistic objectives set by the Colombian policy and the limited instruments and regulatory framework designed to achieve them. Policy-oriented learning is a long process of learning often through trial and error [67]. For Colombia, and many other developing countries, CBT as an approach to local development is a recent phenomenon. Policy-makers have to comprehend a set of factors related not only to social and environmental forces, but also an ideology, values, interests, and power [68]. This paper provides a tool for policy analysis as a method of learning about its strengths and weaknesses that can generate subsequent debate about those issues within the policy-making domain and outside with stakeholders affected by the outcomes. If the Colombian government is willing to engage in a policy-learning process with these actors, that may trigger new rounds of decision-making and potentially reshape some of the weak policy aspects in favour of the communities.

However, recognising the uneven level of access and knowledge input that different actors have in policy processes [69], the collaborative policy-making advocated by many scholars (e.g., [41,69–72]) can only be achieved with political support. Policy-making is a process of negotiation and compromise. Since numerous individuals and organizations seek influence in pursuing their interests, policy-making is about politics and power [73]. In consequence, collective public interests have been progressively abandoned in favour of the interests of business, corporate prosperity, and economic growth [30]. Colombian policy is a good example of prioritizing the interests of powerful players over the collective rights of communities.
Whether that is the result of a poor understanding of empowerment and participatory principles in tourism or a consequence of the political interests of powerful actors remains unclear and requires further research into the policy process. Perhaps it is a mixture of both; as noted by Fazito, Scott, and Russell [74], corporate business discourse promising jobs and injection of capital into economy draws the attention of policy-makers to its wider social importance, dominating policy arena, and often undermining localized social and environmental concerns. Moreover, reliance on local authorities to convene power relations assumes their neutrality, but in reality, governance institutions have their own agendas [57], and in many cases, they would prefer to use their authority for their own benefit. Tosun [8] states that while private sector and central bodies are opposed to community participation in any form, local agencies that are responsible for implementation of strategies and policies for community initiatives generally support community participation, but not at all levels. They wish to share benefits and listen to the inputs of the community, but they also wish to retain the power to decide on how to share, and how much to share with the local community [2]. This approach does not foster empowerment and CBT development, leaving the communities with little possibility to influence local decisions. However, with the support of international NGOs and local grassroots organizations the pressure on the government to share some of its power through participative policy-making and to develop mechanisms that directly favour community-based initiatives is increasing. The improvements have been slow, but steady on all fronts. It is clear that more CBT initiatives succeed now than 20 or 30 years ago when CBT projects were lead almost exclusively by NGOs. Today governmental entities not only promote CBT as a form of local development but also lead local initiatives and develop and implement policies designed to foster locally owned and managed tourism.

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Appendix A. Example of Coding of the Policies’ Content

Table A1. Coding of the policies’ content.

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<tr>
<th>Document</th>
<th>Extracts from the Policy Document</th>
<th>The Category Assigned by Researcher</th>
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</thead>
<tbody>
<tr>
<td>Ecotourism Development Policy, CBT Development Policy</td>
<td>(1) Program for development of community-based tourism accommodation organized by the Ministry of Commerce, Industry and Tourism, seeks to strengthen the quality of life of populations that inhabit rural areas with high tourism value through improvement of housing infrastructure and development of sustainable community-based tourism. The government subsidizes infrastructure, furnishing and capacity-building. The program specifies how and where rural people can apply for dotation. (2) Community-based ecotourism in National Parks of Colombia. This strategy seeks to form alliances between park authorities and local community organizations for the provision of ecotourism services and activities, with a view to the generation of benefits for local actors. It identifies conditions of community engagement with authorities through specific contractual arrangements.</td>
<td>Present</td>
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</table>
### Table A1. Cont.

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<tr>
<td>CONPES 3296 Guidelines to promote private participation in the provision of ecotourism services in National Parks</td>
<td>There are different modalities of private stakeholders’ inclusion. The main and most common forms are outsourcing, contracts of operation, management or leasing, contracts for the provision of services, BOT (Build, Operate, and Transfer), BOOT (Build, Own, Operate, and Transfer), concessions, and joint operations (Joint Ventures), among others. The MAVDT–UAESPNN will encourage the participation of local indigenous, black and rural communities in the processes of planning of the areas, and they (park authorities) will lead the agreement with regional and local institutional actors. Additionally, they will promote the linkages with communities in the development of ecotourism activities in partnership with private operators. The implementation of the schemes of private participation should boost local and regional development through direct or indirect linkages with the surrounding communities, which allow the generation of employment, or the development of complementary community ecotourism services.</td>
<td>Restricted/limited</td>
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#### Factor for evaluation—Capacity development and assessment: Individual level.
This refers to the knowledge, skills, and abilities of an individual. Traditional knowledge about the culture, territory, and the relationship with nature is also valued.

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<td>Ecotourism Development Policy, CBT Development Policy</td>
<td>(1) Program for development of community-based tourism accommodation organized by the Ministry of Commerce, Industry and Tourism. The participants of the program can participate in capacity-building exercises organized by National Education and Capacitation Service (SENA), which seeks to improve the skills and abilities of the owners of the accommodations in order to raise the quality of the service. (2) Community-based ecotourism in National Parks of Colombia. It identifies conditions of community engagement with authorities through specific contractual arrangements that include compulsory development of capacity-building programs and strengthening of community and visitor awareness of tourism and conservation.</td>
<td>Present</td>
</tr>
</tbody>
</table>

#### Factor for evaluation—Protection of community rights: Equity and equality.
This refers to access to clear and truthful information and prior consultation with local and ethnic communities. It is equally important to set up actions in favour of the communities so that they can develop CBT and be involved in tourism with the same or similar level of power as other stakeholders, and to eliminate or reduce vulnerabilities.

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<tr>
<td>CONPES 3296 Guidelines to promote private participation in the provision of ecotourism services in National Parks</td>
<td>Park authorities will disseminate, promote and structure a process of transparent and competitive private participation, guaranteeing the selection of suitable operators and with the necessary experience. It will also define the rules of joint work between the community and the private operator for each type of ecotourism activity.</td>
<td>Undeveloped statement</td>
</tr>
</tbody>
</table>

**Absent:** Lack of any reference to the aspect; **Restricted/limited:** It is included but reference excludes community stakeholders and favours other stakeholders, usually concessionaires, or it is included, but its scope is very limited; **Undeveloped statement:** A statement without any substance to support it; **Present:** It is present and clearly defined, and applicable to all stakeholders.

### References


12. Lawrence, A. No personal motive? Volunteers, biodiversity, and the false dichotomies of participation. Ethics Place Environ. 2006, 9, 279–298. [CrossRef]


37. Dangi, T.B.; Jamal, T. An Integrated Approach to “Sustainable Community-Based Tourism”. *Sustainability* 2016, 8, 475. [CrossRef]


43. Ministerio de Comercio, Industria y Turismo. *Política para el Desarrollo del Turismo Comunitario* [Community-Based Tourism Development Policy]; MCIT: Bogota, Colombia, 2011.


