Master's Thesis: Growth or Development? Analysis of the resorts policy of the state of São Paulo, Brazil

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2018
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Acknowledgements

This thesis would not exist if it was not for the support of different people during the research process.

I would like to start thanking my supervisors, Prof. Dr. Richard Cowell and Prof. Dr. Peter Ache in their guidance, patience and inspiration provided throughout my academic maturity. Besides, although not officially having a role as supervisors, the advices of Prof. Dra. Ester Limonad and Prof. Dra Maria de Lourdes Zuquim were key to help me shape my research goals in the initial steps of this research. My sincere thanks to these four brilliant teachers!

Secondly, I would like to thank the several Atibaianos who received me with open arms during field work. This research would not have the same validity if it was not for the generosity of those who shared their thoughts, feelings and experiences with me during interviews, participant observations and also everyday conversations. My deepest appreciation for you all. May I be able to return the favour for our community in the (near) future.

Last, but definitely not least, I would like to thank the vital support of my families, linked by blood or friendship, Brazilian or international, which offered me companionship and support in these last months at the good moments... and at the other ones too. I would like to mainly thank my mother and father, who shared their love even when physical distance separated us. I am truly blessed to have you as parents. Muito obrigado.
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List of Acronyms

World Tourism Organization (WTO)

Fund for Resorts' Betterment (FME)

Fund for Resorts' Urbanization and Betterment (FUMEST)

Fund for Touristic Municipalities' Betterment (FUMTUR)

Local Tourism Councils (COMTUR)

Non-Governmental Organization (NGO)

Statute of the City (SC)

Master Plan (MP)

Department for the Support of Touristic Municipalities Development (DADETUR)

Atibaia and Region Convention & Visitors Bureau (ARC&VB)

Critical Discourse Analysis (CDA)

Brazilian Institute of Geography and Statistics (IBGE)

Social Vulnerability Index of São Paulo (IPVS)

System of Data Analysis of the state of São Paulo (Seade)
Abstract

This research uses the resort city of Atibaia as a case study to assess the resorts policy of the state of São Paulo, taking into account the new governance scheme triggered by Law 1.261/2015 which transformed Local Tourism Councils (COMTURs) as deliberative organizations. Therefore, the paper employs discourse analysis to reveal connections between actors and their social context, considering a literature review that suggested a dominance of hegemonic groups in decision-making organizations.

Moreover, this research also uses spatial analysis to acknowledge the outcomes of the resorts policy in the case study city, combining data about social vulnerability and number of residents in order to check if the projects financed by the resorts-funds affect areas which are occupied by the majority of the population or the most vulnerable ones, which would imply a sustainable approach for tourism, involving groups of different backgrounds and social conditions.

The research findings showed that organized members of the private sector dominate and influence the outcomes of the resorts policy, which so far prioritized consolidated central areas in the city. This situation is aggravated by a low participation of citizens in the council, compromising its desirable plurality. Yet, rural tourism emerged as a practice which can combine business opportunities with well-being for people from the periphery.
1.0 Introduction

This research has the objective of assess the implementation processes and outcomes of the resorts policy of the state of São Paulo, Brazil. In order to introduce the research to the reader, this chapter presents the context related to tourism development and how the resorts policy fits into that. The problem statement and the research objectives are also fully explained, followed by the research questions and hypotheses which guided the research process.

1.1 Context

According to the World Tourism Organization (2013), tourism has become one of the largest economic sectors in the globe over the last 50 years, providing more than 200 million jobs, representing 9% of the world’s GDP and accounting for 29% of the worldwide exports in services. Besides, the WTO stated that the highest growth in international tourist arrivals and expenses is located on developing countries, revealing a trend and important source of income for these countries (WTO, 2013).

All of these data clearly show a positive economic outcome of the activity, suggesting an impact on the tax revenues, profit and employment rate of countries where tourism is significant. However, when one takes into account topics such as environmental conservation, poverty alleviation and investment in local economy - part of an umbrella concept of sustainable tourism (Beni, 2003) which has been extensively used in tourism policy making in the last decades - the outcome is more open for debate (Hall, 2015).

As Hall (2015) highlighted, there has been a gap between policy making and the policy outcomes, which causes sustainable tourism policies and strategies to receive increasing attention and concern (Fodness, 2017). According to Cruz (2006), this mismatch happens because hegemonic actors in decision-making positions are not committed to collective and egalitarian goals which might harm their economic interests.

As an example, Pivott (2006) found that an economic-oriented tourism development in a tourist city in Brazil has caused - direct and indirectly – spatial segregation, socioeconomic inequalities and environmental degradation in the city (Pivott, 2006, p.295). Such type of result stresses the importance of a sustainable approach for tourism development, along with an analytical view of the implementation processes and outcomes of policies, since public policies in the tourism sector are essential to establish goals and guidelines for its development, encompassing both
public and private actors, affecting the social and spatial outcome of the activity (Cruz, 2002, as cited by Silva, 2012).

1.2 Tourism development in the state of São Paulo, Brazil: Resorts Policy

Despite a nonchalant approach for tourism at the national level (Araújo & Dredge, 2012), the state of São Paulo in Brazil has early started a long-lasting policy for tourism development, with its first form in 1926 (São Paulo, 1926). Although the resorts policy has changed throughout the years, it is still valid nowadays, being updated for the last time in 2015.

First designed to be an honorary title for cities with special touristic assets, the policy had a watershed after the state decided to provide additional budget for tourism development in these resort cities. The Fund for Resorts’ Betterment (FME)\(^1\), created in 1967, was the first form of these funds, with the goal to develop programs of urbanization, betterment and environmental preservation on resort cities (São Paulo, 1967). These topics remained as priorities in the 1970 version of the fund - Fund for Resorts’ Urbanization and Betterment, FUMEST (São Paulo, 1970; São Paulo, 1989) and also in the most recent version, the Fund for Touristic Municipalities’ Betterment\(^2\) (FUMTUR), which also added the goal to develop tourist services and facilities along with the initial three topics (São Paulo, 2016).

A second milestone would be reached in 2015 with the Law nº 1.261, which followed a trend of decentralization at several spheres in Brazil (Araújo & Dredge, 2012) implementing a governance scheme for decision-making at the local level, based on deliberative Local Tourism Councils (COMTURs), which are now entitled to decide where the substantial FUMTUR funds shall be implemented in the city.

1.3 Problem statement and Research Objectives

Despite its long lasting period, the resorts policy of the state of São Paulo has little research about either the policy itself or its impacts on resort cities, raising more questions than answers about the outcomes of the policy at the local level.

Therefore, an analysis of the resorts policy seems to be important not only for its pioneering spirit on the academia, but also to shed a light on what kind of tourism the resorts policy has supported through the years. This is particularly important at the local level, because despite the

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\(^1\) *Fundo de Melhoria das Estâncias*, in Portuguese.
\(^2\) *Fundo de Melhoria dos Municípios Turísticos*, in Portuguese.
increased institutional support for tourism planning and policy which affected the subnational levels in the 1990s/2000s, the capacity of many municipalities to foster tourism development has not necessarily grown in the same pace as their institutional empowerment (Araújo & Dredge, 2012).

The same can be said regarding Local Tourism Councils, which, regardless of their growing presence in Brazilian municipalities, have their effectiveness been widely questioned (Carvalho et al., 2016). Thus, this new COMTURs’ role in decision-making triggered by the Law 1.261/2015 serves as a great opportunity for the study of this new governance scheme and how it affects implementation processes of the resorts policy.

Hence, a policy implementation analysis at the local level can reveal trends, restraints and opportunities for the resorts policy implementation processes at the most “fragile” of the governmental tiers. In addition, an analysis of the outcomes of the policy can provide insights about the decision-makers who are involved in the implementation of the policy, in an interactive relation of cause and effect (Cargo & DeGroff, 2009).

In order to achieve its goal, this research took into account the role of discourse as a simulacrum of wider social practices (Fairclough & Melo, 2012), analysing both documents and actors which are related to the resorts policy implementation, to assess their influence on the process.

Moreover, tourism was considered as an activity that essentially promotes space and its differentiation as an attraction for tourists (Fonseca, 2005; Cruz, 2006), therefore this research also employed an analysis of the spatial distribution of the projects funded by the resorts-funds as a way to reveal what kind of tourism has been supported by the resorts policy, and who was affected by this type of tourism.

To sum up, this research will thereby use the resort city of Atibaia, São Paulo, Brazil, as a case study to analyse the implementation and outcomes of the resorts policy of the state of São Paulo, considering its spatial production and the role of organizations and their actors in the process.

1.4 Research Questions and Hypotheses

In order to achieve the objective of analysing the implementation processes and outcomes of the resorts policy, there were two questions which guided the research:
1) Related to the outcomes: What has been the spatial distribution of the resorts-related projects in the municipality?

2) Related to the implementation processes: How have different actors influenced the conception and implementation processes regarding the resorts-related projects?

These questions were raised based in the literature review (Chapter 2.0) and theoretical framework (Chapter 3.0), shaping my hypothesis that the tourism development supported by the resorts policy focus on central areas rather than the periphery, thus reinforcing an already existing segregated space (Pivott, 2006). In accordance to that, I expected a network of actors who, being representatives of the elite (Cruz, 2006; Pivott, 2006), compromised a desired more representative outcome of the resorts policy in the city, closer to a sustainable practice of tourism.

1.5 Structure of the Thesis

This study begins with a literature review (Chapter 2.0), presenting the topic of tourism development and its context in Brazil. Besides, authors' papers about the resorts policy and cities are discussed, followed by a historical perspective on state interventions in Brazil, finally ending the chapter with a discussion on local councils and their role in the Brazilian re-democratization era.

Secondly, the theoretical framework (Chapter 3.0) highlights the connection between tourism and space, followed by definition of sustainable tourism and governance and legitimacy. In the next chapter (4.0), the methodology of the research is presented, where the choices for research design, methods and data analysis are discussed, followed by considerations about ethics and research constraints.

The fifth chapter describes different aspects of the resort city of Atibaia, contextualizing the resorts policy in it. After this, Chapter 6.0 presents a spatial and discourse analysis of the material collected by the methods described in Chapter 4.0, forming the core of the research findings.

Lastly, the conclusion (Chapter 7.0) summarizes the discussion of the previous chapter, besides arguing about their limitations, giving recommendations for future research and ending with some reflective comments about the research process.
2.0 Literature Review

This chapter reviews the existing literature regarding the topics introduced in the previous chapter. Instead of presenting an exhaustive discussion of the topics, the chapter reunited the most relevant material written by other authors taking into account the objective of this research: assess the resorts policy and its implementation processes and outcomes.

Therefore, this chapter discusses tourism development and the different rationales related to it, including how tourism development has been handled in Brazil; the resorts policy and the findings of other authors who studied it; state interventions on space and the ideology and interests underneath these interventions along the Brazilian history; and, finally, local councils and authors’ findings about the issues concerned to them.

2.1 Tourism Development

Among the scholars who discuss tourism development, Michael Hall has written several papers, collaborating with numerous authors (e.g. Hall, 2010; Hall, 2015; Rutty et al., 2015). Hall’s opinion about tourism development can be understood by his comparison between development and growth: “Growth refers to the quantitative increase in economic output, whereas development refers to an increase in the quality of output without an increase in material and energy use” (Hall, 2010, p.137).

These dichotomies between development vs growth, and qualitative vs quantitative outputs represent different mindsets and approaches to analyse tourism impacts. In fact, until the 1970s, tourism was mostly seen in an optimistic way due to its contribution to economy (e.g. tax revenues, income, investment, employment). However, in the 1970s, under the influence of environmental impact legislations and national environmental protection agencies (first in the United States of America, and then worldwide), new analyses with a more holistic approach appeared, going beyond economic outputs, including, for example, environmental and social consequences (Rutty et al., 2015).

A new paradigm would be reinforced after the 1987 Brundtland Report, which formally introduced the concept of sustainable development, defined as a “development that meets the needs of the present without compromising the ability of future generations to meet their own needs” (United Nations General Assembly, 1987, p.43).
From that time onwards, sustainable development as a concept was present in policies, strategies and guidelines in various areas, including tourism (Ruhanen, 2008). However, as Hall (2015) emphasized, regardless of its conceptual influence in the last decades, tourism still remains very far from being a sustainable practice, resulting in a gap between the use of the concept and the empirical reality regarding sustainable development.

In line with that, Cruz (2006) claims that the reason sustainable development affects only the conceptual level is because hegemonic actors at the political and economic spheres are not committed to collective and egalitarian goals of the concept. Similarly, as Gunn and Var (2002) discussed, although the public sector has the institutional power to offer long-range regulation and legislation to foment sustainable development, an effective outcome will more likely happen only when the developers of the sector recognize that it is on their best interest to sustain natural and cultural resources in order to maintain the quality of their own activities.

In this context, Saarinen (2017, p.312) is assertive in calling a “proactive, holistic, and responsible thinking and critical studies on tourism development and planning”, paradigm which this research aspires to be part of.

2.2 Tourism Development in Brazil

According to Araújo and Dredge (2012), tourism development in Brazil had a historically fragmented characteristic which compromised potential long term goals and achievements for the sector until the late 1980s, it was only in the 1990s that the country would more actively participate in tourism development and its related policy making and planning. This new approach culminated in the creation of the Brazilian Ministry of Tourism in 2003, which exemplifies the growing importance of the sector for the national government at the time (Araújo & Dredge, 2012, p.17).

The Ministry of Tourism, in line with other ministries, would then start a decentralized and participatory approach, focusing at the regional and local levels (Araújo & Dredge, 2012, p.24). This new approach exemplifies a tendency observed by Cruz (2006), which identified new (i.e. post-1990) paradigms of tourism development in Brazil:

<table>
<thead>
<tr>
<th>Dominant paradigm</th>
<th>Past – until the end of the 1980s</th>
<th>Present</th>
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These new paradigms reflect wider changes which affected the country in the 1990s, namely a process of re-democratization which took part after a long period of authoritarian rule. This new era in Brazil, marked by an economic neoliberalization and globalization, gave the conditions for the rise of new governance practices (Araújo & Dredge, 2012), discussed later on in this chapter.

With a team of professionals related to the tourism area, the Ministry of Tourism under the Lula presidential terms in the 2000s set goals of tourism development which encompassed social, cultural, environmental and economic impacts. However, after 2011, under Dilma Rouseff’s presidency, the Ministry was put into the political positions allotment system, resulting in six changes of ministers in the coming six years period (Aldrigui, 2017). The situation would persist under Michel Temer presidency, where scandals and investigations would mark the new appointed ministers (Congresso em Foco, 2016; Affonso & Araújo, 2017).

As expected, the inefficiency which characterized these ministers went hand in hand with the poor tourism development at the national level. As Aldrigui (2017, p.206) states, the current

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3 Brazil has a political coalitional system, which means parties part of the coalition in power always strive to get high level political positions in the government, such as head of a ministry. As quite frequently happens, these new assigned ministers lack experience on their respective ministries areas, undermining their success.
situation shows that there is “no bright future for national tourism policy in Brazil”, increasing the importance of the subnational levels.

2.3 Resorts Policy

The policy for resorts development of the state of São Paulo has its roots in 1926, when Campos do Jordão was officially entitled as the first “sanitary city” of the state (São Paulo, 1926). At that time it was believed that the cities which had the title possessed special air and water characteristics which positively impacted the health and well-being of those who experienced them (Pupo, 1974), a highly appealing quality in a time when tuberculosis severely hit the country (Antunes & Waldman, 1999).

Figure 1 – Location of the State of São Paulo, Brazil

These sanitary cities rapidly became famous for their hotels and guesthouses, which offered different kinds of accommodations and activities for their clients. Taking Campos do Jordão as a case study and example, Hammerl (2011) highlighted a slow functional shift in the city, from an attractive place for people concerned with health, to an attractive place for people concerned with leisure. This transformation took place at the beginning of the tourist industry in the state of São Paulo, already influenced by state-led investments in infrastructure (Aldrigui et al. 2010)
and national policies which socially and economically empowered the middle class in the 1930s and 1940s (Hammerl, 2011).

In 1946 all the sanitary cities titles were changed to “resort cities” (São Paulo, 1946), lately divided in subtypes: hydromineral, climatic, seaside and sanitary resorts (São Paulo, 1947), officially marking the consolidation of a state policy for tourism development in these municipalities, which would turn out to be the state’s main policy for tourism from that time onwards (Fino & Queiroz, 2012).

Among the few authors who wrote about the resorts policy, Aulicino (1994; and the updated version of the paper, 2001) was the only one who evaluated the resorts policy as a whole. She did that by comparing social and economic indicators of two groups of resorts and non-resort cities with similar population and spatial distribution (i.e. distance from the capital). Due to her findings that showed that the resort cities had better indicators, the author affirmed that tourism brought "income, jobs and even better life conditions for the local population" (Aulicino, 1994, p.41; 2001, p.145). Whilst there is no doubt tourism helps local economy dynamics, claiming that these higher indicators are caused by tourism and thus serve as a proof of the resorts policy success seem insufficiently substantiated, considering the following questions:

1) Have these resort cities presented better results because of their resorts title, or have their entitlement been influenced by these better results?
2) Can we say better economic indicators are a direct result of tourism development? What about the role of other economic activities?
3) What measures a policy success? What about issues of environmental preservation and tourism infrastructure which are targeted by the resorts-related funds?

Hence, Aulicino’s focus on mostly economic data and her analysis of the resorts policy serves as an example of a traditional approach to evaluate tourism development (or, in this case, tourism growth) which seems insufficient to evaluate a policy.

On the other hand, there were some authors who used study cases to analyse the resorts policy and cities, being able to assess more complex information. Fino (2009), for example, showed how the resorts policy had little or no outcomes in the municipality of Salto, which despite several requirements officially imposed by the state government to a candidate city which wishes to receive the official title of resort, had its entitlement in 1999 due to an existing acquaintance between the local politicians and the state governor at the time. According to the
author, due to several issues within the local government and its tourism department, tourism development in Salto was previously inexistent and kept like that even after the city was granted the title of resort.

From a different perspective, Cestari (2017) affirmed that it is impossible to talk about the resorts policy and not mention the role of the State as the most important actor regarding interventions on space related to tourism development. In line with that, Hammerl (2011, p.8) mentioned a decree which established a zoning code in Campos do Jordão in 1940 that separated neighbourhoods which could have low class accommodations for sick people from neighbourhoods where this was not permitted. The author stressed that this code not only had sanitary purposes, but also reinforced a segregation induced by the elite (with support from the government) at the time. Also in an illustrative way, Pivott (2006) used discourse and spatial analysis to analyse how tourism development has shaped the resort city of Campos do Jordão throughout the years, finding that tourism development caused, directly or indirectly, spatial segregation, socioeconomic inequalities and environmental degradation in the city (Pivott, 2006, p.295).

### 2.4 State intervention on space in Brazil

The history of state intervention on space in Brazil has been discussed by different authors, each one with its own focus and analysis.

In a more long-term perspective, Villaça (1999) is responsible for the paper named “A contribution for the history of urban planning in Brazil”, which is one of the most important source for studies in the area. In this work the author discussed the evolving state intervention on space in their related forms of planning and practice between 1875 and 1990, highlighting the context in which they were inserted. In order to do that, Villaça divided the period at stake in three different subperiods:

- First period (1875 – 1930)

*Betterment and embellishment interventions*

These years were marked by betterment and embellishment interventions, inspired by big international projects and movements, such as Haussmann’s interventions in Paris and the U.S.-based City Beautiful movement. The interventions at this time were greatly embedded by ideology, used to glorify the State and the capitalist people in power (Villaça, 1999).
Villaça uses the example of the Paulista Museum, in São Paulo, which, along with its gardens and monument to the independence of the country, constitutes, until nowadays, one of the iconic symbols of the city.

**Figure 2 – Paulista Museum, in São Paulo**

![Paulista Museum](http://www.spbairros.com.br)

Source: SP Bairros.

Regarding public participation and debate about the state interventions, Villaça highlights the existent widespread advertisement and discussion about the plans and projects at that time, which were often “discussed, attacked, supported, contested or neglected, but never ignored” (Villaça, 1999, p.197). According to the author, the dominance of the hegemonic groups at the time was so absolute that the elite could afford to openly discuss their plans (Villaça, 1999).

**Sanitary urbanism**

Another relevant practice at the period, associated with the betterment interventions, but with a singular focus, was the “sanitary urbanism”. This kind of intervention used epidemic control as a justification for intense urban transformation, concerned about aesthetics and hygiene, fostering

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4 Paulista means “from the state of São Paulo”, in Portuguese.
5 Available at: http://www.spbairros.com.br.
the design of open air and green spaces which would host the new functions of the city and its “civilized citizens” (Müller, 2002, p.15). This process was especially impactful at city centres, changing the aspect and profile of downtown dwellers, removing tenement houses and giving the opportunity for upper class new ventures in central areas (Dantas, 2003).

However, despite of its health intentions, such state interventions in central areas caused the poor citizens to be pushed towards the periphery, usually the only alternative available for those who could not afford properties in the urbanized, consolidated areas (Villaça, 1999). This cannot be seen as a mere side-effect, but as a sign of intentional action, as exemplified by Campos do Jordão’s zoning code discussed by Hammerl (2011), which serves as a great example of the rationale at the time.

- Second period (1930 - 1990)

In this period, efficient plans started to overcome the embellishment ones, thus revealing a new rationale. According to Villaça (1999), the main reason for this change was the new necessities of the rising industrious and urban elite which substituted the former rural aristocracy, resulting in the efficient city concept overshadowing the beautiful city one.

The new state interventions started to prioritize the creation of infrastructure, particularly concerned with mobility, in order to attend the necessities of the capital to have the proper conditions for its circulation and reproduction (Villaça, 1999). Meanwhile, the necessities of the peripheries were still not seen as a priority, since the interests of the hegemonic groups were very far from that area. Regardless of its “invisibility”, Caldeira and Holston (2005) mention, as an example, that the periphery of São Paulo city has steeply grown its population and area throughout the second period.

Yet, differently from the previous period identified by Villaça, the widespread dominance of hegemonic groups started to be limited by the working class movements in cities. These movements started to grow their own urban awareness, acknowledging the spatial manifestation of the existing inequalities (Villaça, 1999).

As an illustrative example, the poet Lima Barreto made a significant reflection about state interventions on space in Rio de Janeiro in the 1920s: "It is noticeable that the main concern of the present governor of Rio de Janeiro is to divide the city in two: one will be the European, the other, indigenous" (Resende, 1993, p.51).
This supports what Carvalho and Rodrigues (2016) differentiate as “city and non-city” in Brazil, highlighting two different categories of space inside a municipality: the legal one, where the state is active, either as a provider or regulator, and where basic infrastructure and sanitation exists - centres and other urbanized neighbourhoods; and the illegal one, where state intervention is either minimum or absent – periphery (also Caldeira & Holston, 2005).

As a consequence, since the State was “unable” (unwilling) to solve what was seen as “urban problems” (e.g. lack of proper housing, sanitation, infrastructure) the second period defined by Villaça is marked by an era where there is a rupture between rhetoric and practice in urban planning. The state interventions on space followed their elite interests-oriented paradigm, but the planning apparatus designed in the form of strategies and documents would only influence the rhetoric level, without a practical effect in the city, besides concealing the State priorities (Villaça, 1999). The author calls these plans as “egghead plans”, since they were not worried with their operationalization and viability (Villaça, 1999, p.204), marking a total mismatch between planners and their institutions and the decision-making actors at the executive branch in the city halls (Villaça, 1999, p.217).

Considering the context of the resorts city policy, it is not a coincidence that the FME/FUMEST/FUMTUR funds which provided additional budget for resort cities always included infrastructure and urbanization projects: the first form of these funds emerged in the 1960s, when the State’s interventions on space paradigm was aligned to an effort to make the space attractive for the private capital in order to foster the tourism sector (Cruz, 2006).

- Third (1990 onwards)

In line with the newer paradigms of tourism development (item 2.2), the third and current period identified by Villaça is also affected by the re-democratization process of the country and its decentralization and participative approach. This confluence of factors allowed social movements and NGOs to influence a new urban legislation which represented a historical watershed in forms of the 1988 Federal Constitution\(^6\) (FC) and the consequent Statute of the City\(^7\) (SC) of 2001, culminating in an urban policy which drew attention of several authors, including Holston (2008), Carvalho and Rossbach (2010) and Friendly (2013).

\(^6\) Constituição Federal de 1988 in Portuguese.
\(^7\) Estatuto da Cidade in Portuguese, or Law 10.257/2001 (see reference list)
According to Holston (2008, p.292), the Statute of the City is “remarkable in the history of urban legislation, policy, and planning not only in Brazil but worldwide”.

The popularity of the aforementioned legislation is due to their social rationale, inspired by Lefebvre’s concept of “right to the city” (Lefebvre, 2001). For the first time in a country historically marked by its land concentration and social and spatial inequalities, law stated that urban development should be oriented towards a social function of the city in order to secure citizens’ wellbeing (Brasil, 1988, Article 182). Therefore, in order to tackle real estate speculation, private land was legally subordinated to the public interest (Pereira & Wütrich, 2016).

One of the most important contributions of the Statute of the City is the provision of a

(... broad set of instruments to enable the Municipality to be in a position to formulate an urban policy that can give concrete expression to the social function of urban property and to the right of all people to the city. (Carvalho and Rossbach, 2010, p.95)

These urban instruments should be detailed in Master Plans (MP) in order to be valid in a municipality, therefore turning the MP into a key tool to build an urban development strategy which aims at the effective application of the urban instruments provided by the Statute of the City (Carvalho and Rossbach, 2010). Moreover, in compliance with its social goals, the SC also establishes that all Master Plans must be both developed and implemented with active popular collaboration (Brasil, 2001, art.40, §4º).

However, besides its innovative legal framework, the third period, once again, is characterized by a divergence between rhetoric and practice. Villaça (2005), in his book with the suggestive title of “The illusions of the Master Plan”, stressed the difficulties of approval of the Statute of the City instruments in the São Paulo’s city 2002 Master Plan, highlighting the several actors who were not in favour of principles of social justice - at least when those principles went against their privileges. In line with that, Villaça emphasizes that this conflict was immensely unequal, since the hegemonic actors (particularly the powerful real estate market association of the city), besides having bigger knowledge about the processes, also had their own subtle ways to access decision-makers and override public hearings (Villaça, 2005). The author then

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8 Each Master Plan is, besides a technical document, also a law, thus they should be also voted and discussed in City Councils in order to be valid.
recognizes that, aggravating such scenario, poor citizens were not interested in debating and participating in such kind of processes, since they did not see the topic as part of their interests or more urgent daily life problems (Villaça, 2005).

As Villaça (1999) emphasizes, the fate of urban planning in Brazil goes hand in hand with the ability of poor citizens to be aware of their own conditions and politically organize themselves, claiming for what they are legally (and morally) entitled to in the city.

2.5 Local Councils in Brazil

As discussed by Gohn (2011, p.354), local councils\textsuperscript{9} in Brazil are established by the Federal Constitution of 1988 as organizations for the manifestation, representativeness and participation of the population. Therefore, local councils are part of the public sphere, and are integrated into different agencies of the State which are related to specific public policies, such as the Local Tourism Council and the resorts policy regarding tourism development, for example.

According to Abramovay (2001), the establishment of local councils is the most important institutional innovation in Brazil after the re-democratization of the country. This new political arrangement decentralized the power of the government and created, at a local level, the opportunity for individuals and organized groups to take part in decision-making processes. However, as the author emphasized, there is no study about local councils in Brazil which does not mention the limited social participation of these councils, which are frequently prone to dominant local powers (Abramovay, 2001, p.121).

Similarly, Carvalho, Oliveira and Pimentel (2016) argued that besides the common sense notion in the country of local councils as organizations of democratic management and intense participation, the practical outcomes of these councils are quite questionable.

Regarding that, Gohn (2011) mentions that despite the legal requirements which demand deliberative councils, these organizations have quite often, in practice, maintained only consultative powers, restricting their scope of actions to opinions and advice, which may or may not been followed by the de facto decision-makers. As the author emphasized, local councils can be only effective when their powers are respected and followed, otherwise, as it happened in many municipalities without organizational and associative traditions, councils can serve as a tool for mayors and the elite to exert dominance (Gohn, 2011, p.355).

\textsuperscript{9} Conselhos Gestores, in Portuguese.
2.6 Conclusion

As this chapter showed, tourism development can be understood in two different ways, one emphasizing the economical outputs, and the other focusing at a more egalitarian goal, closer to a sustainable practice of tourism. Yet, such practice has had difficulties to be fully implemented, due to the role of some authors in undermining its implementation. Similarly, tourism development in Brazil has been hindered by the political system at the national level, therefore increasing the importance of the subnational ones, especially considering new public management processes which fostered decentralization in the country.

In this context, the resorts policy emerges as an example of state-level policy which affects the local level. As seen in this chapter, the resorts policy and its outcomes are linked to wider phenomena, requiring a spatial perspective which has been highlighted by some authors. Therefore, this chapter also provided a historical view of state interventions on space in Brazil, revealing the evolving rationale through the years, and how this rationale is connected to the state and hegemonic groups, even if nowadays practices regarded as democratic are advertised. Considering this, the literature review finished arguing about the role of local councils in the country, stressing the issues they face for their empowerment.
3.0 Theoretical Framework

The theoretical framework of this paper is directly related to the research objective discussed on Chapter 1.0: analyse the resorts policy of the state of São Paulo by its spatial production and the role of actors in the implementation processes.

In order to achieve this objective, this chapter draws upon the literature review presented on Chapter 2.0, providing a theoretical framework which highlights the inseparable relation between tourism and space, while defining a desired form of tourism with a sustainable approach for development, which will serve as a reference for comparison in the later spatial analysis of the outcomes of the resorts policy.

Moreover, taking into account what was said about local councils and their operational issues, the chapter also presents the definitions of governance and legitimacy used in this research, which will support the analysis of power of actors and organizations related to the resorts policy implementation processes in Chapter 6.0.

3.1 Tourism and Space

Pivott (2006, p.41) and Silva (2012, p.49) named as a “geographic approach of tourism” a type of approach which focuses on the spatial aspect of the activity, recognizing the core relation between tourism and space.

In line with that, Cruz (2003) defines tourism as a social practice, involving people in a journey across a territory, whose space is its main object of consumption. Similarly, Siviero (2006, p.54) states:

From a spatial perspective, tourism is a big consumer of space, being also responsible for its production and transformation. The complexity of the topic is perceived by the social relations and their embodiments, which form the process of spatial production.

Such concepts are important to understand that, since space serves as “raw material” for tourism, the activity can – at least in theory, promote any kind of space as touristic, since tourist attractiveness is historically and culturally produced (Cruz, 2006). As an example, Boyer mentions that until the XVIII century there was no widespread habit to visit neither mountains nor oceans, since they frightened most of the population (Boyer, 2003, as cited by Cruz, 2006, p.339). Nowadays this situation is hard to imagine to anyone who has ever visited a ski resort in
the Alps or the Copacabana beach in Río de Janeiro, revealing how habits change throughout time.

This characteristic of tourism imbues it with the potentiality to distribute income across the territory, on different places, differentiating it from other social (and economic) activities (Cruz, 2006).

This geographic approach of tourism is highly influenced by the seminal book of Henri Lefebvre - The Production of Space, where the author brilliantly discussed how space is socially produced, and, as a result, also politically contested (Lefebvre, 1991). In fact, regarding the political arena, Soja (1993, p.7) emphasizes that spatial comprehension is a source of emancipatory insight and practical political consciousness.

However, Cruz (2003, p.115) is categorical on her assertion that solving economic and social problems are not attributions of the tourism sector, and one cannot expect more than tourism can actually offer. Nevertheless, also according to the author, a public policy for tourism should be used as a way to promote well-being in a society (Cruz, 2003, p.115), fostering a sustainable practice, discussed below.

3.2 Sustainable Tourism

On a nutshell, sustainable tourism is associated with a form of development which involves a balance between space, environment and economy (Gunn and Var, 2002). Considering a more detailed perspective, the World Tourism Organization (2013, p.17-18) highlighted three key elements for it, encompassing:

1) Make optimal use of environmental resources that constitute a key element in tourism development, maintaining essential ecological processes and helping to conserve natural heritage and biodiversity.

2) Respect the socio-cultural authenticity of host communities, conserve their built and living cultural heritage and traditional values, and contribute to inter-cultural understanding and tolerance.
3) Ensure viable, long-term economic operations, providing socio-economic benefits to all stakeholders that are fairly distributed [emphasis added], including stable employment and income-earning opportunities and social services to host communities, and contributing to poverty alleviation.

This subtle reference to the spatial aspect, emphasized by me, has a crucial role in our research analysis, since, as we discussed on the literature review, poverty is unevenly distributed in Brazilian cities, and in the resort city of Atibaia this is not an exception, even if the city has its own particularities on its spatial arrangement (see item 5.0). Thus, a tourism development which affects areas in both centre and periphery, involving actors from different social classes, serves as a reference point for our own evaluation of the resorts policy outcomes.

In line with the WTO definition, Beni (2003) highlighted several features which should be part of a sustainable approach of tourism, including:

- knowledge about the impacts caused by tourism, fair distribution of costs and benefits of the activity; creation of direct and indirect local jobs; promotion of profitable business;
- investments in the local economy in order to achieve its diversification; interaction with all sectors and society groups [emphasis added]; development of a strategic and logistic transport modes; support to the productive use of lands outside of central areas (rural tourism); subsidies for the costs of environmental conservation (Beni, 2003, p.14).

This broad social participation in tourism development mentioned by the author and emphasized by me, and the related involvement of actors from different social classes and backgrounds suggest a more representative and democratic approach for tourism development, which encompasses the definition of governance and legitimacy discussed in the next item.

3.3 Governance and Legitimacy

The definition of governance used in this research is based on the work of Stoker (1998) who discussed governance as a form of collective action which relies on a network of actors that includes representatives of the government, private sector and civil society for its decision-
making, opposing traditional centralized ways of public management in the sole figure of the government, fostering a system of shared responsibilities.

As previously discussed in Chapter 2.0, the re-democratization process of Brazil which started in the 1990s was marked by initiatives of decentralization and participative approaches, impacting different areas in the country, including urban planning (Caldeira & Holston, 2005) and tourism development (Cruz, 2006).

Regarding the resorts policy universe, its latest legal form established a governance scheme based on local tourism councils (COMTURs) formed by representatives of the three sectors that perform decision-making regarding tourism development at the local level. As argued by Stoker (1998), such type of governance body is open for criticism on the basis of its legitimacy and accountability, since the network of actors who are part of these bodies might be “driven by the self-interest of their members rather than a wider concern with the public interest or more particularly those excluded from the network” (Stoker, 1998, p.24).

Considering Beni’s (2003) definition of a sustainable approach of tourism which encompasses actors from different social classes and backgrounds, Villaça’s (2005) findings on the new practices of urban planning (after the Statute of the City) and its failure in fostering social justice and wide public participation despite its legal framework, and, finally, Abramovay’s (2001) discussion about the vulnerability of local councils towards dominant local powers, legitimacy stands in the order of the day for the analysis of the resorts policy implementation processes which this research has as a goal, particularly concerning the role of the Local Tourism Council and its decision-makers.

As Stoker (1998, p.20) argues, a scenario of “legitimation deficit undermines public support and commitment to programmes of change and ultimately undermines the ability of power-holders to mobilize resources and promote co-operation and partnership” (Stoker, 1998, p.20), mandatory conditions for long term and transformative processes associated to sustainable practices.

Hence, for this research, Beedham’s (1991, p.19, as cited by Stoker, 1998, p.21) dimensions for the legitimacy of a political system will be used to perform an analysis of the decision-makers legitimacy in the resort city of Atibaia, encompassing three conditions stressed by the author:

- Conformity to established rules;
- Justifiability of the rules by reference to shared beliefs; and
- Express consent of the subordinates (or the most significant among them) to the particular relations of power.
4.0 Methodology

This research is basically interpretivist in its epistemology and ontology, since it acknowledges reality as something not “given” (as the adoption of positivist ontology would imply), existing detached from its own context. Thus, reality is perceived as socially constructed and not objectively determined (Hudson & Ozanne, 1988).

In line with that, considering researchers are also part of this reality, it is important to recognize, in a reflexive and critical way, that I am also imbued with my beliefs and bias, being part of a specific social, and academic context (Kuhn, 1972). Hence the choice of a deductive approach for this paper, making the hypotheses which guided the research process clear from its beginning.

The use of such approach significantly influences how the research is carried out, since my research questions were tailored in consideration to the chosen theoretical framework, which was, in its turn, also directly influenced by the literature review process. This approach implies that, if the theoretical framework and literature review were consistent, such would be the findings, driven by my theoretical interests (May, 2011). On the other hand, as May (2011) emphasizes, social theories which are not sustained by empirical evidence are open for refutation, adding another interesting layer of usefulness for such approach.

Going hand in hand with my interpretivist perspective, which recognizes reality as complex and multiple (Hudson & Ozanne, 1988), this paper uses case study as a research design, since this choice provided an opportunity to an in-depth study, aiming for a “case totality” (May, 2001, p.225-226), understanding meanings, motives and other subjective experiences which are specific to a time, place and context (Hudson & Ozanne, 1988). By doing so, I was also open for deviations, building knowledge with the help of informants, in a more collaborative approach, aligned to our interpretivist philosophy (Hudson & Ozanne, 1988).

4.1 Research Design

Cargo and DeGroff (2009) recognized the importance of case studies for policy implementation analysis, as such research design provides contextual and pluralistic understanding, important attributes in a multi-dimensional exercise. In addition, since this research aimed to investigate

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10 “Knowledge generated” (Hudson & Ozanne, 1988, p.511).
the impact of a policy, which is always associated with a particular geographic boundary, it was appropriate to keep a similar frame.

In fact, among the few authors who wrote about resort cities and tourism development, Pivott (2006) and Fino (2009) both used a case study approach, the first about Campos do Jordão, and the later about Salto. This common characteristic is due to the particularization and rich portrayal of a place, which allow researchers to understand its complexity (May, 2011).

Another strong point about case studies is their possibility to offer new propositions to test, as long-term immersion in an area and the contact with multiple actors may provide insightful thoughts to the researcher (May, 2011). Therefore, as previously mentioned, I was open for deviations during the research process, in a collaborative approach for researching (May, 2011).

4.1.1 Case Study Selection

My case study was selected for the following reasons:

1st – Atibaia is among the oldest resort cities in the state of São Paulo, being recognized as a sanitary city and resort in the 1940s (São Paulo, 1945; São Paulo, 1947). Since then the city has enjoyed the benefits of being part of this select group of municipalities in the state, accessing the special funds provided for resort cities and promoting its title on every official communication, revealing the importance of the resorts policy in the city.

Figure 3 – Official logo of the City Hall (Prefeitura) of the Resort (Estância) of Atibaia

2nd – Considering the evolving forms of the resorts policy, it is significant that one of the authors of the Law 1.261/2015, which deeply changed how the policy affects resorts cities, is a local actor of Atibaia who has already been the city mayor and the Secretary of the Tourism

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12 Source: prefeituradeatibaia.com.br. Adapted for better visualization.
Department of the state of São Paulo, implying a strong relation between the city, its local actors, tourism development and the resorts policy as a whole.

3rd – As Flyvbjerg (2006) suggests about case studies, intimate knowledge and expertise are only reached via experience. Thus, being born in Atibaia can be seen as an advantage since we already have knowledge about the local context, as well as a network of contacts to be explored, which we expect to be more easily reached due to our shared background.

This personal relation also undoubtedly implies some risks though – see item 4.5.

While a single-case study undermines a further generalization which a multiple-case design would facilitate, it allows, on the other hand, a more detailed and in-depth study, desired characteristic for a research guided by the theoretical framework and methodology used in this research. In fact, the validity and generalizability levels of a case study rely mainly in its theoretical reasoning, which should support the necessary connections between the case study features (Meyer, 2001). Thus, it is important to emphasize the processes perceived in the case study, as well as their context, since this information enables the reader to acknowledge which conditions are important to form such situation (Hartley, 1994, as cited by Meyer, 2001, p.347).

4.2 Methods

This research employed a wide range of methods, involving documentary research, participant observation and semi-structured interviews. While the last two are widely regarded as qualitative types of methods, documentary research provides information which could be analysed in either quantitative or qualitative ways (May, 2011). As a matter of fact, in this study, documentary research contributed with material to both spatial (quantitative) analysis and discourse (qualitative) analysis, discussed later on in this chapter.

Therefore, the mixed methods approach used in this paper aimed to generate “the most informative, complete, balanced, and useful research results” (Johnson et al., 2007, p.129), acknowledging the complex nature of socially produced reality, but still tailoring the research by what is best suited for its purpose, rather than being restricted by philosophical positions (Branner, 2005, as cited by Dures, 2012).

4.2.1 Documentary Research

Documentary research is a method which allows researchers to use different sort of documents (e.g. historical books, reports, novels, political speeches, maps, marketing campaigns,
photographs) as sources in the study process. As such a wide array of options suggests, the high diversity of data it provides is one of the main strengths of the method (Scott, 1990, as cited by May, 2011, p.195). Moreover, besides the opportunity to get in contact with, for example, historical accounts, documentary research also provides the opportunity for researchers to compare field work findings with what has been documented by other authors, which can give important insights not only about research findings, but also about the authors whose works have been used as comparison.

Bearing that in mind, these research documents were analysed not as neutral artefacts, but as something imbued with meaning, whose discourse is the product of a wider social context which must be taken into account in an analysis. Such understanding is perfectly exemplified by Mark Monmonier’s (1991) seminal book, suggestively named “How to lie with maps”, which showed how different authors, in their own context and with their own interests, used cartography in order to promote a particular view of spatial phenomena. Thus, May’s refers to Said is assertive in advocating for a necessary level of suspicious which the researchers need to employ when dealing with documents, particularly when they imply authority and power (Said, 2004, as cited by May, 2011, p.199).

In line with that, it is important to take into account the relation between the authors and the expected audience, since documents might, for example, be designed to involve a particular kind of group and neglect others, even if this information is not clearly stated. Moreover, what is discussed or showed in a document can be as insightful as what was chosen to not be part of it, since such choice is rarely accidental. As May (2011) stressed, a critical analysis would take into account what has been constructed as “natural” or “self-evident” in a particular document.

- **Application**

Documentary research was used to reunite documents which were related to either the implementation processes or the outcomes of the resorts policy. Hence, my search aimed at institutional sources which could reveal about matters of governance and guidelines for the resorts policy. Moreover, I also strived to reunite relevant material about the resorts-related projects which were funded, especially regarding information about their nature and spatial location in the city. In addition, this method also provided valuable material about decision-makers and their organizations.
Table 4 presents a comprehensive list of the analysed documents, and, in a brief way, what their content is and why they were selected.

**Table 2 – Analysed documents**

<table>
<thead>
<tr>
<th>Document</th>
<th>Publication Year</th>
<th>Content and utility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law 1.261/2015</td>
<td>2015</td>
<td>This law implemented the most recent changes in the resorts policy. It was used as a basis for delimitation of the governance scheme, as well as a source in the search for definitions of tourism development.</td>
</tr>
<tr>
<td>Law 16.283/2016</td>
<td>2016</td>
<td>The law presents the different domains which are entitled to be financed by the FUMTUR funds (e.g. environmental preservation, infrastructure, etc.). It was used to help in the classification of the existing resorts-related projects in the city, as well as a source in the search for definitions of tourism development.</td>
</tr>
<tr>
<td>Atibaia’s Tourism Master Plan</td>
<td>2009</td>
<td>The first Tourism Master Plan of the city presented a SWOT (Strengths, Weakness, Opportunities and Threats) analysis of the tourism situation of the city at that time, besides the city vision for the coming years, including the desired projects for the city. It was used as a source for discourse analysis.</td>
</tr>
<tr>
<td>Atibaia’s Tourism Master Plan</td>
<td>2018</td>
<td>The brand new Tourism Master Plan is basically an update of the previous one, with almost the same content. It was valuable in the process of identifying actors to be interviewed.</td>
</tr>
<tr>
<td>Guide for the Creation and Strengthening of Local Tourism Councils</td>
<td>2018</td>
<td>This document is a handbook for municipalities in order to implement COMTURs in their territory. The guide aims not only at resort cities, but also at all the cities of the state. It was a valuable</td>
</tr>
<tr>
<td>Source</td>
<td>Year</td>
<td>Description</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>List of projects financed by the FUMEST/FUMTUR funds in Atibaia</td>
<td>2018</td>
<td>This list had details (e.g. location, type of the project, cost) about the resorts-related projects implemented between 2006 and 2017. It was mainly utilized to form the spatial data used later on in the spatial analysis.</td>
</tr>
<tr>
<td>Public Manifest of Atibaia’s Tourism</td>
<td>2012</td>
<td>This document was released by actors from the tourism sector in 2012, who complained about the local government’s performance on tourism development. It was a particular rich example of an existent conflict at the time, being a valuable source for discourse analysis.</td>
</tr>
<tr>
<td>Tourist Map</td>
<td>2017</td>
<td>The current tourist map of the city served as a link between spatial and discourse analysis, revealing which areas of the city are not seen by the municipality as attractive for tourists.</td>
</tr>
</tbody>
</table>

Besides these documents, I also tried to have access to the projects which were financed by the resorts-policy in the city prior to 2006, both with the City Hall (and its several departments) and the Tourism Department of the state of São Paulo (through the DADETUR 13 office), to no avail. Therefore, considering the oldest projects I managed to access were related to 2006, this was the first year of analysis regarding the spatial outcomes of the policy in Atibaia.

### 4.2.2 Participant Observation

Participant observation is a method which is qualitative in its essence, valuable when researchers want to immerse themselves in a social scene, understanding it by what they listen, observe, and, above all, experience (May, 2011). The method was chosen since it enabled me to grasp detailed information which could be hardly accessed by other means, such as behaviour and power relations within a group.

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13 The Department for the Support of Touristic Municipalities Development (Departamento de Apoio ao Desenvolvimento dos Municípios Turísticos, in Portuguese) is a branch of the Tourism Department of the state which decides whether the resorts-related projects submitted by the resorts cities fit the requirements for their funding and implementation.
Gold (1969) used a classification scheme for the method, dividing it in 4 different approaches, related to the level of immersion the researcher has when using it: Complete participant, participant as observer, observer as participant and complete observer. According to this division, I had a role as participant as observer when at field work, meaning I was willing to understand the people and processes within the setting, but without an attempt to act as one of these people (May, 2011). Yet, interaction was both expected and fostered, since it enhanced my understanding of the actors and their social scene. Thus, it is impossible to neglect that our presence might have changed how people behaved, requesting from me a critical opinion about my own influence in the setting. Nevertheless, it remained crucial that I, as a scientist, analysed the events as they happened, without omitting information or performing biased analyses (May, 2011).

As May (2011) argues, although participant observation might sound like a method which is easily performed, its operationalization is actually very demanding, requesting the researcher to have an attentive stance, questioning what looks like mundane and paying attention to details, subtle expressions and implied meanings which might say a lot about the existing social relations in the context.

Such in-depth and valuable information makes participant observation, when used in a critical and reflective way, as a great tool to “control hasty theoretical conclusions” (May, 2011, p.166), considering explanatory theories (and hypotheses) should fit the data, instead of being “forced to it” (May, 2011, p.166), particularly useful for a deductive research logic, such as the one used in this research.

- **Application**

Participant observation was used in this research mainly to access actors related to the resorts-policy, particularly the ones part of the Local Tourism Council. The method was especially useful for a first form of contact with these actors, which facilitated the process of identifying potential interviewees and helped the later process of scheduling the interviews.

Besides, the method also provided in-depth information about power relations among actors related to the resorts policy. This was achieved through in-site discourse analysis, involving observation and field-noting of both spoken and body languages. The application of this method was helped by Bruyn’s (1966, as cited by May, 2011) indices, tailored to help researchers in
focusing at particular elements during field work: Time, place, social circumstances, language, intimacy and social consensus.

The method was employed twice, taking into account both research constraints regarding time (discussed on item 4.2.7) and the opportunities that appeared while at field work in Atibaia. Therefore, I attended a meeting of the Local Tourism Council (COMTUR), and also the City Council session which voted the approval of the city's 2018 Tourism Master Plan.

### 4.2.3 Interviews

May (2011) presents four different types of interviews in social research, according to the level of control of the process by the interviewer (or, in a different perspective, interviewee’s freedom to talk) and the amount of interviewees participating in the process, classifying each type as: Structured interview; semi-structured interview; unstructured/focused (open-ended) interview; and focus interviews with groups. In this research the semi-structured interview format was chosen, designing both questions in a standardized format, and also specific questions shaped according to interviewees’ type of involvement with the resorts policy and tourism development in the city. In addition, besides the questions designed in advance, I also added questions on spot, considering the information which was shared throughout the conversation. Hence, besides guaranteeing a degree of comparability between results, I also had access to in-depth specific information, reuniting the positive qualities of both structured and focused types of interviews, reflecting the mixed-method approach previously discussed.

Hence, by this method, I was able to get in touch with “people's biographies, experiences, opinions, values, aspirations, attitudes and feelings” (May, 2011, p.131), offering a “basis for direct interpretation of complex patterns of social interaction rather than drawing inferences based on decontextualized bits and pieces” (Williams, 2014, p. 95). Such connection between individual and context stands at the core of this research, directly associated with the view of reality as socially constructed (Hudson & Ozanne, 1988).

Based on this research theoretical framework and literature review, interviews were used to gather information which could not be accessed by documents, such as actor’s conceptions on tourism development, their opinion about the governance scheme of the resorts policy and its associated organizations, and their thoughts on priority areas within the city to receive tourism development investments, which where valuable information for the discourse analysis step.
Moreover, interviews offered the opportunity to access practical information regarding the resorts policy implementation processes, including how the Local Tourism Council works.

More than simply asking questions, the interviews method requires both analytic and emotional skills from the researcher, including concentration, sympathy and support (Gerson & Horowitz, 2002), securing a proper environment for a conversation which, in some cases, might reveal sensible information. Thus, as May (2011) emphasizes, matters of trust, transparency and cooperation are central before, during and after the interview happens (see item 4.2.6).

- **Application**

Both documentary research and participant observation were helpful in identifying key actors related to the resorts policy implementation in the city, not only by observations and analysis, but also considering the suggestions which were given to me while at field work. However, I was aware that although this type of collaborative research facilitates field work processes, especially when time at the setting is limited (item 4.2.7), it might also result in omission of actors who are not part of a type of network, and/or whose opinions opposes the establishment (May, 2011).

Hence, in order to overcome that, besides actors from the main organizations related to the resorts policy at the local level (local government, COMTUR and Convention), actors outside of these organizations were also interviewed. In addition, considering the importance of the spatial dimension in this research, I actively searched for actors related to the resorts policy/tourism development who were located or representative of the periphery.

Saturation point for the sample was established when conflicting discourses emerged. Therefore, more than a recipe which was strictly followed, sampling was an iterative process which took into account the continuous findings during the research process.

In the end, the actors who were interviewed had at least one of the following characteristics:

- Prominent decision-making role at either conception or implementation of the resorts-policy funded projects;
- Representative position in one touristic activity which takes part/is connected to the periphery of the city; and
- Historical perspective of the resorts-policy impacts in the city.
The final sample of 6 actors who were interviewed is presented in the table below. As discussed on item 4.5, all of them authorized the publication of their names and positions in this research.

### Table 3 – Actors interviewed

<table>
<thead>
<tr>
<th>Actor</th>
<th>Relation to tourism/resorts policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bruno Perrota Leal</td>
<td>Secretary of the Tourism Department of Atibaia.</td>
</tr>
<tr>
<td>Raphael Prellwitz Risspoli</td>
<td>President of the Local Tourism Council of Atibaia (COMTUR).</td>
</tr>
<tr>
<td>Mônica Rubia de Oliveira Fontes</td>
<td>President of the Atibaia and Region Convention &amp; Visitors Bureau (ARC&amp;VB).</td>
</tr>
<tr>
<td>Ana Paula Reck</td>
<td>Rural Tourism Councillor in the COMTUR.</td>
</tr>
<tr>
<td>Lilian Vogel</td>
<td>Coordinator of folklore and popular culture of the city of Atibaia.</td>
</tr>
<tr>
<td>José Roberto Trícoli</td>
<td>Former mayor of Atibaia, former Secretary of the Tourism Department of the State of São Paulo and one of the authors of the Law 1.261/2015.</td>
</tr>
</tbody>
</table>

The detailed questions for each participant are presented in Appendix C.

These questions were designed in a “crescendo” of complexity, starting with simple ones (e.g. background information) and then moving to more complex questions (e.g. opinions about processes). Instead of just listening to the interviewee, I held and engaged conversation, showing both our interest and knowledge about the topic. These “interventions” were important to highlight our common background in the city, important feature to access significant information (May, 2011, p.140).

In order to be time-effective and not make unnecessary questions, I also made a research about the interviewees and their organizations before the actual interview, avoiding asking questions whose answers could be found in other sources.

After all the interviews were held, I transcribed all their content. During the process of transcribing, I wrote questions and comments regarding the authors’ discourses, which facilitated a later organizational step, which divided these discourses in themes. A short sample of this process is exemplified in Appendix D. The complete ones are available upon request.
4.3 Data Analysis

In this research I performed both quantitative (spatial) and qualitative (discourse) analyses of the data collected using the previously mentioned methods. This choice of methodology enabled the use of triangulation, which is important for synthesis and integration of information, identifying interdependencies and causal processes (May, 2011). Moreover, as Jick (1979) argues, triangulation can give support to new and deeper dimensions to arise, key characteristic to provide a solid picture of the processes of implementation of the resorts policy, as well as their outcomes in Atibaia.

4.3.1 Discourse Analysis

The discourse analysis used in this research is based on the Critical Discourse Analysis (CDA) methodology, which encompasses not only verbal or written pieces of language, but also other forms of expression, such as visual and body language (Fairclough, 2001).

Considering discourses contain different meanings, Fairclough and Melo (2012, p.307-308) acknowledge them as part of a context of social practices, being related to different elements, as showed in Table 2:

<table>
<thead>
<tr>
<th>Elements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activities</td>
</tr>
<tr>
<td>Objects and instruments</td>
</tr>
<tr>
<td>Social relations</td>
</tr>
<tr>
<td>Social identities</td>
</tr>
<tr>
<td>Cultural values</td>
</tr>
<tr>
<td>Awareness</td>
</tr>
</tbody>
</table>

Source: Author, based in Fairclough and Melo (2012).

In a Critical Discourse Analysis perspective, the aforementioned elements are seen as distinct, but not independent, since they influence each other. This characteristic forms a dialectic relation among them, and while one element stands as one valid representation of its social context, it also shapes how society is constituted (Fairclough & Melo, 2012). What CDA does, then, is link discourse analysis to broader social structures, aiming to answer how language is
being used, and “why particular vocabulary or rhetorical strategies are deployed, how these are interpreted, and what is accomplished through these strategies” (Hastings, 1999, p.9).

As Hewitt (2009, p.2) emphasizes, such type of analysis can “expose patterns and hidden rules of how language is used and narratives are created”, leading to a useful analysis of power relations (Hastings, 1999). In line with that, Hajer (2005, p.303) claimed that dominance can be perceived once one discourse dominates social practices (e.g. tourism) and their related institutions, making things appear as “normal ways of reasoning”, or even “natural social facts”.

Hajer’s (2005) valuable discussion on dominance is related to his discourse-coalition approach, which was used in this research following his definitions of metaphor, story line and discourse coalition:

- Metaphor represents one or more words which symbolise the key ideas of the discourse (e.g. sustainability; tourism development, climate change). While the same metaphor can be employed by different actors, the meaning which they actually attach to them can be very distinct;
- Story line is the essence of a discourse, a “condensed form or narrative in which metaphors are used” (Hajer, 2005, p.302). Story lines often summarize complex narratives, and, by doing that, omit discursive complexity. Yet, such characteristic enables people who do not share the same values to work together in the same discourse-coalition, since “people often have their own versions of a particular story” (Hajer, 2005, p.302);
- Discourse coalition represents a group of actors that, being part of the same social practice, shares “the usage of a particular set of story lines over a particular period of time” (Hajer, 2005, p.302).

Such choice of approach for discourse analysis was chosen due to its particularity in analysing the controversies of individual discourses in a wider political context, going beyond mere reference to interests. Moreover, the discourse-coalition approach is useful in illuminating “how different actors and organizational practices help to reproduce or fight a given bias without necessarily orchestrating or coordinating their actions and without necessarily sharing deep values” (Hajer, 2005, p.305).

• Application

The application of the discourse analysis was performed in two steps, starting with an initial definition of broad themes related to the theoretical framework and literature review, which
guided the selection of relevant discourses from the vast material part of the documents, field notes and transcribed interviews which were collected or generated during the application of the methods previously discussed in this chapter.

Secondly, using Hajer’s discourse coalition approach, different storylines and their related metaphors were separated in groups based on their similar or opposing meanings, facilitating the analysis and discussion of the main topics related to my research goals and questions.

4.3.2 Spatial Analysis

Spatial analysis allows the researcher to visualize the spatial arrangement of data, particularly useful when patterns of proximity and relationship can have an explanatory power (Hall, 2010; Anselin, Murray & Rey, 2013). Therefore, this analysis is especially helpful when different data is involved, giving a broader insight of relationships between structures and processes (Goodchild & Janele, 2004, as cited by Hall, 2010).

Considering the essential relation between space and tourism discussed on the theoretical framework on Chapter 3.0, spatial analysis is crucial to achieve a solid analysis about the tourism development supported by the resorts policy. In line with that, spatial analysis has been extensively used in geography and urban planning, including tourism studies, in its various fields of relevance (Hall, 2010).

- Application

Spatial analysis involved triangulation of data in a spatial perspective, highlighting the (spatial) outcomes of the resorts policy in Atibaia in a way to raise questions about the processes which produced them. Three maps were generated to enable this spatial analysis, briefly described below:

The first map displayed the location of the resorts-related projects in the municipality, altogether with the spatial division of urban and rural areas, with emphasis on the city centre. Such arrangement aimed to provide the right information to either prove or reject the research hypothesis of a concentration of projects in central areas of the city.

The second map related the location of the resorts-related projects with information about number of residents in the municipality. Such combination aimed to check if bigger amount of residents were influencing the location of the projects, raising questions about the decision-making processes.
This map used the most recent census information provided by IBGE\textsuperscript{14}, considering the smallest spatial division analysed by the institution, the 2010 census areas\textsuperscript{15}.

In a similar logic to the last map, the third one displayed the location of the resorts-related projects altogether with information about social vulnerability in Atibaia, checking for a relation between groups of higher social vulnerability and the location of these projects in order to give an insight into decision-making processes.

This map also used the census areas spatial division, adding social, economic and demographic data, all three condensed in the most recent (2010) Social Vulnerability Index of São Paulo (IPVS)\textsuperscript{16}, which was elaborated by the Seade Foundation\textsuperscript{17} in order to provide the regional and local governments of the state of São Paulo with social and spatial information about population in vulnerable conditions, which should be, as the own Seade Foundation emphasizes, the priority target group for public policies (Seade, 2013, p.6).

Respecting this guideline, this research used the IPVS to check if groups in social vulnerability were involved in the outcomes of the resorts policy.

\subsection*{4.4 Ethical Considerations}

Ethical considerations are important not only for a matter of character and honesty, but also to guarantee that all parties are respected and will not be negatively affected by the research process (Anderson, 2015). This is particularly relevant when dealing with public officials (but not restricted to them), who can suffer public or institutional pressure by their peers or superiors.

In line with that, I elaborated an agreement which was presented to every interviewee before the interview actually happened. Besides stressing the objective of the research, the document emphasized three important elements for the interviewees to bear in mind:

- Their participation in the research as volunteers (i.e. optional);
- Their right to access the transcript of the interview before its content was used at the thesis; and

\textsuperscript{14} Instituto Brasileiro de Geografia e Estatística (IBGE) is the national institution responsible for, among other things, collect data about the country and its population in all its territorial divisions.
\textsuperscript{15} Setor censitário, in Portuguese.
\textsuperscript{16} Índice Paulista de Vulnerabilidade Social, in Portuguese.
\textsuperscript{17} Seade (Sistema Estadual de Análise de Dados) is a foundation associated with the Department of Planning and Management of the state of São Paulo, responsible for the generation of a wide range of social, economic and demographic information and analysis about the state’s population.
- Their right for anonymity and the possibility for partial or complete removal of content from the interview before its publication.

The model of the agreement is part of the Appendix B\textsuperscript{18}. As it is important to emphasize, all 6 interviewees agreed with the use of their names in the research, and all of them had access to the transcriptions of the interviews in due time, with some of them asking for amendments, which were incorporated in the final version, respecting their will.

Such agreement was not handled to the actors present at the events in which I attended as a participant observer, since, differently from the interviews, both events were open to the public.

Following Cardiff University’s requirement, an Ethics Form is also part of the Appendix E.

4.5 Constraints

The most notorious limitation of the research was related to time constraints, involving both limited time to write a Master’s thesis, and even shorter time to perform field work in Brazil. Such conditions meant I had limited room for adapting my agenda to a bigger amount of events in which I could do participant observation at the case study setting, or even involve more interviewees in the research process. In the end this influenced the choice of a single-case study instead of also encompassing the analysis of other resort city or even the involvement of regional (state) level events or actors.

Secondly, since this research used discourse analysis, founded in the perspective that discourses and society are interwoven, it is important to recognize the limitations which translations from Portuguese to English entail. This was somehow minimized by repeated and careful revising of these discourse translations, as well as the eventual addition of notes in brackets for clarification, but the matter should still be taken into consideration.

Last but not least, my background living in Atibaia, despite the advantage of opening doors and building bridges among parts, implies I have my own view on the research topic, including my opinion about local authority’s role and which elements should be recognised as important for tourism development and where they should be invested in the municipality. This view could have affected the way the interviews and participant observation were performed, or even influence the research. Thus, it remained crucial that I followed a rigorous auto-analysis about my own role during the interviews, minimizing biases. This was associated with detailed and

\textsuperscript{18} The original ones are available upon request.
descriptive information provided about how the methods were employed, approach which improves the research reliability and validity.
5.0 Setting the stage: The resort city of Atibaia

Before starting the analysis and discussion of the research findings, it is important to have an overview of the study case used in this research, so these findings can be contextualized. Therefore, this chapter presents social, economic and spatial information about the resort city of Atibaia, as well as a short account of the conditions which allowed the city entitlement as a resort, which will be important at the later analysis chapter.

5.1 Overview

Atibaia is a municipality of the state of São Paulo, Brazil, with a population of approximately 125,000 inhabitants according to the last available national census (IBGE, 2010). Although considered at the “lower tiers” of medium-sized cities in what regard the Brazilian standards for amount of population, which generally classify as medium-sized cities those with at least 100,000 inhabitants (Filho & Serra, 2001), Atibaia is located between the three biggest metropolitan regions of the state, being part of this important network of cities (IBGE, 2008).

Map 1 – Atibaia and its connections with the metropolitan regions nearby
As the Map 1 depicts, Atibaia is crossed by two highways (BR-381 and SP-65, in dark grey) which connect it to the metropolitan regions' centres: São Paulo capital city, Campinas and São José dos Campos. This proximity with these bigger cities is key to understand the city's dynamics, which has already been summarized as a “dormitory town” (JC Atibaia, 2015), since a considerable amount of its inhabitants work in one of these centres but return to the city to sleep. Such strong influence impacts the industrial park of the city, which benefits of the existing highways to transport their production to the numerous consumers within the metropolitan areas. Accordingly, the importance of the industry for the city, considering the sector's employability, is bigger than the state's average:

**Table 5** – Percentage of jobs provided by different sectors in Atibaia and in the state of São Paulo (2016)

---

<table>
<thead>
<tr>
<th></th>
<th>Atibaia (in %)</th>
<th>State of São Paulo (in %)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture</td>
<td>4,81</td>
<td>2,34</td>
</tr>
<tr>
<td>Industry</td>
<td>25,51</td>
<td>22,33</td>
</tr>
<tr>
<td>Commerce and Services</td>
<td>69,68</td>
<td>75,33</td>
</tr>
</tbody>
</table>

Data source: Fundação Seade, Informações dos Municípios Paulistas.\(^{20}\)

Similarly, the agricultural sector, while still being considerably smaller than its peers, also has a bigger importance in Atibaia than in the state. This characteristic is linked to a historical role of the sector in the city, initially marked by the production of wheat, cotton and coffee, and, finally, after the 1940s, fruits and flowers (Conti, 2001; Sant’Anna, 2004).

However, on the other hand, the agricultural sector has been increasingly reducing its employability level in the last decades, as the Table 6 shows:

**Table 6** – Number of people employed in the agricultural sector in Atibaia and its variation between the reference years

<table>
<thead>
<tr>
<th></th>
<th>1985</th>
<th>1995</th>
<th>2005</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of workers</td>
<td>5,702</td>
<td>4,782</td>
<td>4,183</td>
</tr>
<tr>
<td>Variation</td>
<td>/</td>
<td>-16,14%</td>
<td>-12,53%</td>
</tr>
</tbody>
</table>

Data sources: Censo Agropecuário IBGE (1986; 1996; 2006).\(^{21}\)

Although growing mechanization might have an important role in such variation, it is insightful to take into consideration the different sectors’ average income as a strong motivation for workers to choose another type of activity to work with:

**Table 7** – Average income provided by different sectors in Atibaia (2016)

<table>
<thead>
<tr>
<th></th>
<th>Atibaia (in R$)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture</td>
<td>1,207.75</td>
</tr>
<tr>
<td>Industry</td>
<td>3,066.63</td>
</tr>
<tr>
<td>Commerce and Services</td>
<td>2,304.69</td>
</tr>
</tbody>
</table>

Data source: Fundação Seade, Informações dos Municípios Paulistas.\(^{22}\)

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\(^{20}\) Available at: http://www.imp.seade.gov.br [Accessed 4 June 2018].

\(^{21}\) The agricultural census 2016 was postponed to 2017, and at the time of the writing of this thesis (first semester 2018), it has still not been published.

\(^{22}\) *Idem.*
As the Table 7 attests, Atibaia has a huge disparity among the sectors’ average income, which is comparably very low in the agricultural sector. Such discrepancy is symptomatic of a society marked by differences, resulting in a considerable amount of people who are in situation of medium, high or very high social vulnerability, accounting for 22.2% of the city’s total population according to the IPVS social vulnerability index:

**Figure 4** – Population distribution according to their social vulnerability (IPVS 2010) groups in Atibaia

![Population distribution graph](http://indices-ipl.al.sp.gov.br/view/index.php [Accessed 4 June 2018]).

Data source: Seade, Índice Paulista de Vulnerabilidade Social\(^{23}\).

Yet, considering its importance for this research analysis, it is relevant to check the spatial arrangement of these different social vulnerability groups in the city, which can reveal the existence or absence of distribution patterns in the territory:

**Map 2** – Distribution of groups of social vulnerability (IPVS 2010) in Atibaia

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\(^{23}\) Available at: http://indices-ipl.al.sp.gov.br/view/index.php [Accessed 4 June 2018].
Table 8: Detailed information about the social vulnerability groups IPVS (2010), coloured in accordance to Map 2.

<table>
<thead>
<tr>
<th>Group</th>
<th>Social and Economic Conditions</th>
<th>IPVS 2010</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Very High</td>
<td>Extremely Low Vulnerability</td>
<td>Urban or Rural</td>
</tr>
<tr>
<td>2</td>
<td>Medium</td>
<td>Very Low Vulnerability</td>
<td>Urban or Rural</td>
</tr>
</tbody>
</table>

Source: Author. Data source: Seade, Índice Paulista de Vulnerabilidade Social.²⁴

As expected, the map highlights some important spatial characteristics of the city. First of all, it is relevant that the whole city centre of Atibaia is classified as an area of very low vulnerability, attesting what was being said in the literature review about consolidated central areas being occupied by people of better social and economic conditions, while poor people live in the periphery (Villaça, 1999). Nevertheless, a closer look at this periphery reveals a lack of homogeneity, since areas of low, very low and extremely low vulnerabilities are right next to areas of medium, high and very high vulnerabilities.

This diversity in the periphery ranges from residents of gated communities, usually inhabited by people with low, very low or extremely low social vulnerabilities, and quite often located nearby the highways (thus being especially popular among commuters), to poor workers who cannot afford the price of land at the city centre and its nearby areas.

Hence, it is possible to say that the city centre of Atibaia consists of a population of very low social vulnerability, while the city’s periphery is constituted by inhabitants of distinct social and economic conditions, including all 22.2% of citizens who are at the medium, high or very high social vulnerability groups.

5.2 Resorts policy in Atibaia: the beginning

The consolidation of Atibaia as a hydromineral resort city in 1947 can be directly related to the role of some local authors, including the politician Joviano Alvim, the poet and artist André Carneiro and the hotelier César Memolo (Conti, 2001; Zanoni, 2005). In fact, as emphasized by Conti (2001, p.83), the contribution of the hotel sector was crucial to make Atibaia a resort city, since the hotels actively advertised the municipality, either directly or by the artists whom were invited to use their lodgings and publicize the city qualities:

Figures 5 and 6 – Postcard from the Grande Hotel Atibaia, date unknown (front and cover)
Partial translation: Atibaia is the best city for your holidays, weekends and resting times, with its pure waters and healthy climate, evergreen lands and wonderful landscapes. It is the closest Hydromineral and Climatic Resort to the capital [of the state], the ‘feasible paradise on Earth’, as quoted by the poet Amadeu Amaral.

Therefore, one cannot analyse the impact of the resorts policy in the city without considering the network of actors, particularly the hoteliers, who were actively engaged in the promotion of Atibaia as a resort city. As the next chapter shows, the hotel sector still has a key role in what regards tourism development and the resorts policy implementation in the city.
6.0 Analysis and Discussion

This chapter presents the research findings in light of the literature review and theoretical framework of this paper, driving the analysis by the research questions and hypotheses which guided the research process:

- Question related to the outcomes of the resorts policy:
  
  *What has been the spatial distribution of the resorts-related projects in the municipality?*

- Hypothesis:
  
  *The tourism development supported by the resorts policy focus on central areas rather than the periphery, thus reinforcing an already existing segregated space (Pivot, 2006).*

- Question related to the implementation processes:
  
  *How have different actors influenced the conception and implementation processes regarding the resorts-related projects?*

Hypothesis:

*A network of actors representative of the elite compromises a desired more representative outcome of the resorts policy in the city, closer to a sustainable practice of tourism (Cruz, 2006; Pivot, 2006).*

More than just looking for answers to these initial questions, the analysis provides a detailed view of the pieces of information which emerged during the research, assembling a jigsaw constituted by the resorts policy implementation processes and outcomes in the resort city of Atibaia.

6.1 Resorts policy outcomes and related decision-making

This first section presents the spatial outcomes of the resorts policy in Atibaia, using triangulation of data to raise questions about the decisions which influenced its spatial arrangement in the city. Finally, the section discusses the decision-making process of the resorts policy, presenting discourses of actors and documents which contributed to the aforementioned outcome.

6.1.1 Spatial Outcomes
According to the document provided by the Department of Planning and Finances of the City Hall of Atibaia (Appendix A), there were 20 different projects\(^{26}\) financed by the FUMEST/FUMTUR funds in the period between 2006 and 2017, classified in the following categories\(^{27}\):

1) Betterment (13 projects);
2) Infrastructure, associated to urbanization (4); and
3) Tourist facilities (3).

As significant as the complete absence of projects related to environmental preservation - the fourth and last category which can benefit from the resorts-related funds (São Paulo, 1989; São Paulo, 2016), is the substantial prevalence of betterment projects in this list. Such type of project was popular in the first period (1875 - 1930) of state intervention on space in Brazil discussed by Villaça (1999), when betterment and embellishment interventions were widely carried out by the state, especially on central areas. Accordingly, the spatial arrangement observed in the study case pays a tribute for the old times in what regards spatial concentration:

Map 3 – Resorts-related projects (2006 – 2017) and their location in the city of Atibaia

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\(^{26}\) Projects with the same nature and location, divided as “Part 1”, “Part 2”, etc., were counted as only one project in this sum.

\(^{27}\) Although the local government classified all of them as either “infrastructure” or “infrastructure/urbanization” in the document, it was clear that a more detailed classification could be done, suiting the FUMEST/FUMTUR specifications. Therefore, I associated projects of paving/street alterations as “urbanization”; betterment and renovation projects as “betterment” (connected to Villaça’s [1999] discussion on betterment and embellishment interventions on space – see Chapter 2.0), and those related to new tourist facilities as “tourist facilities”.

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The map clearly portrays a majority of projects in the urban area: 18 out of 20 (90%)\textsuperscript{30}, with a stronger presence at the city centre: 11 out of 20 (55%). Moreover, considering the city centre surroundings, encompassing the areas within 1 kilometre of its borders, the number is even higher, involving 16 of the 20 (80%) projects.

\textsuperscript{28} Available at: http://www.atibaia.sp.gov.br/suma/index.asp?centro=legislacao [Accessed 8 May 2018]
\textsuperscript{29} Available at: ftp://geoftp.ibge.gov.br/ [Accessed 19 May 2018].
\textsuperscript{30} The remaining 2 projects are inserted in the boundaries of the official urban/rural division. Considering the dynamics of the area, and for a matter of simplification, avoiding a discussion which is not in the focus of this research, they were considered as part of a rural area in this analysis. Such assumption could be contested though, and, in this case, there would be 100% of projects in the urban area of the municipality.
This particular spatial layout confirms the hypothesis of a focus on central areas, answering the research question about the spatial distribution of the resorts-related projects. Nevertheless, this answer immediately leads to a different question: Why is there such preference?

If number of residents were taken into consideration for example, the periphery would still be a priority area for investments:

**Map 4** – Resorts-funded projects (2006 – 2017) and distribution of residents (2010) in the city of Atibaia

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Source: Author. Data sources: Prefeitura de Atibaia (Appendix A); and IBGE.\(^{31}\)\(^{32}\)

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\(^{31}\) Available at: ftp://geoftp.ibge.gov.br/ [Accessed 19 May 2018].
As the Figure 7 makes it even clearer, the west part of an imaginary “central sector”, which in reality encompasses the neighbourhoods of Caetetuba and Alvinópolis, is where the biggest amount of dwellers live in the city:

**Figure 7** – Resorts-funded projects (2006 – 2017) and distribution of residents (2010) at the central sector of Atibaia.

This topic is even more important considering the majority (85%) of the resorts-related projects involved betterment and infrastructure, which are dear to areas where people under social vulnerability are located (Caldeira & Holston, 2005). Yet, as the Map 5 and Figure 8 show, there are no resorts-related projects in any area where people of medium, high or very high vulnerability (IPVS’ groups 4, 5, 6 or 7), which account for 22,2% of the local population, live:

**Map 5** – Distribution of resorts-related projects (2006 – 2017) and groups of social vulnerability (IPVS 2010) in Atibaia

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32 Available at: https://censo2010.ibge.gov.br/sinopseporsetores/ [Accessed 19 May 2018].
33 Available at: ftp://geoftp.ibge.gov.br/ [Accessed 19 May 2018].
34 Available at: https://censo2010.ibge.gov.br/sinopseporsetores/ [Accessed 19 May 2018].
Source: Author. Data sources: Prefeitura de Atibaia (Appendix A); IBGE\textsuperscript{36}, and Seade, Índice Paulista de Vulnerabilidade Social\textsuperscript{37}.

Figure 8 – Distribution of resorts-related projects (2006 – 2017) and groups of social vulnerability (IPVS 2010) at the central sector of Atibaia

\textsuperscript{36} Available at: ftp://geoftp.ibge.gov.br/ [Accessed 19 May 2018].
\textsuperscript{37} Available at: http://indices-ilp.al.sp.gov.br/view/index.php [Accessed 4 June 2018].
Such spatial arrangement reinforces segregation in the city, differentiating central places which receive investments on betterment and infrastructure from other peripheral places which do not benefit from such projects, reflecting Villaça’s (1999) and Pivott’s (2006) findings regarding state interventions on space and tourism development discussed on Chapter 2.0.

Such outcome diverges from the definitions of sustainable tourism development presented on Chapter 3, which encompass the provision of “socio-economic benefits to all stakeholders that are fairly distributed” (WTO, 2013, p.17-18) and “interaction with all sectors and society groups” (Beni, 2003, p.14).

However, the question of why such situation exists still remains. Thus, in order to start answering it, the next item presents information about the decision-making process regarding the resorts-related projects.

6.1.2 Decision-Making

38 Available at: ftp://geoftp.ibge.gov.br/ [Accessed 19 May 2018].
Considering the current version of the resorts policy, the Local Tourism Council of Atibaia (COMTUR) is responsible to decide which projects will be financed by the FUMTUR funds. This governance scheme is more completely detailed and discussed later on in the next section of this analysis chapter, so, for now, the focus will be at the discourses assessed by the interviews method and what they reveal about the decision-making process, in light of the findings of the resorts policy analysed in the previous item.

According to one of the COMTUR’s members, the choice of areas for investment in tourism development is related to “where the demand is higher” (Reck, A. P., personal communication, April 20, 2018). More precisely:

> Maybe, there is a lack [of investment] in the periphery? Yes... But it seems that the tourist does not actively search [for other places to visit], so we would need to make an investment, advertise it, so other areas of the city [besides the ones which concentrate the investments nowadays] would also have this appreciation (Reck, A. P., personal communication, April 20, 2018).

Accordingly, the Secretary of the Tourism Department of Atibaia states: “People [at the periphery] also have many things there, but I believe that, to attract tourists, there is some tidy-up needed [emphasis added]” (Leal, B. P., personal communication, April 16, 2018).

By the use of the “tidy” metaphor, this illustrative storyline suggests two things: First - that a place must be “tidy” to attract tourists, and second - that the periphery is still not “tidy” enough to attract them. In this logic, what could make a place “tidy”? As stated before, 85% of the resorts projects of the 2006 - 2017 period are involved with either betterment or urbanization. Would these areas in the periphery not boost their attractiveness if they had at least part of these investments?

They surely would. As the COMTUR’s president recognizes:

> The idea is, for example, to involve [the neighbourhood of] Caetetuba, who knows, in a short period, there could be, for example, town squares for the practice of sports, walking, appreciation, so you have, for example, a good restaurant there (...) (Risspoli, R. P., personal communication, April 18, 2018).
This aforementioned idea is in fact related to a plan of tourism decentralization in the city, also mentioned by the Secretary of the Tourism Department of Atibaia. However, when I asked if there was any expectation on when this plan would be implemented, impacting the periphery, the answer was: “We have a vision which has priorities. And... we have other [priorities] which are much more important, eventually, than this decentralization at the moment” (Risspoli, R. P., personal communication, April 18, 2018).

Accordingly, as reinforced by all actors from the COMTUR who were interviewed, the actual priorities of the organization are mostly connected to the existing natural areas of the city: Pedra Grande and Grota Funda. More than just environmental awareness, these priorities are directly related to business opportunities:

(...) Atibaia also has this vocation, involving the Pedra Grande, which is our vision for the future - this is a consensus among the COMTUR, Convention and Tourism Department, to transform it [the Pedra Grande] into a park, because this also adds to both the business [tourism] and the leisure [tourism], you have the adventure tourism, the ecotourism, inside all this complex (...) (Leal, B. P., personal communication, April 16, 2018).

Therefore, in the same way the city as a whole can be divided in two, between consolidated areas and the non-consolidated ones, the periphery can also be separated in two: the one which offers business opportunities, and the one which does not. Such division highlights how decision-makers do not put the necessities of the population under vulnerable situation into account, showing how invisible part of the periphery is.

In fact, more than just an expression, part of the periphery is indeed invisible in the tourist map of the city for example, which was commissioned by the local government of Atibaia:

**Figure 9**: Cropping of the imaginary “central sector” of Atibaia.
In detail: The red polygon highlights the area which should be occupied by the Caetetuba neighbourhood, where the most vulnerable population (including slum dwellers) are located. Instead, the scale is distorted and the poor neighbourhood is erased from the map, given its place for green areas which are actually located further away from that place.

As discussed by Monmonier (1991), such kind of spatial representation is not accidental, but a direct product of the author intentions with the map, considering its desired target group: tourists, showing how not only actors, but also organizations related to tourism development in Atibaia are permeated with a business-oriented discourse which ignores the periphery, thus revealing a dominant discourse (Hajer, 2005).

As this statement implies, the representativeness of decision-makers and related organizations, as well as their discourses are open for debate, which is fostered in the next section of this chapter.

6.2 Resorts policy implementation processes

This section provides different background information about the organizations and decision-makers related to the resorts policy, taking into account that discourses are associated to elements of social practice that are inseparable from a wider social context (Fairclough & Melo,

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Hence, to begin with, the section presents the governance scheme of the resorts policy, followed by a discussion about the dominant discourse related to tourism development in its institutional framework, as well as in its discourse coalition at the local level. Finally, both the representativeness of organizations part of the governance scheme and the actors who constitute them are debated.

6.2.1 Governance

Considering the resorts policy different forms, both local governments and Local Tourism Councils (COMTURs) have had a key role regarding the resorts policy implementation processes: while until 2015 the local government held the power to decide which projects would be funded by resorts-related funds, after the law 1.261/2015 the COMTURs were transformed from consultative to deliberative councils, shifting the power relations between these two organizations. Thus, nowadays the COMTURs, which are formed by members from the civil society, private sector and local government, can decide which projects will be implemented using the FUMTUR funds.

However, although empowered by law, the COMTURs on resort cities can still be “sabotaged” by local governments, as the president of Atibaia’s COMTUR mentions using the example of what happened in the resort city of Bragança Paulista:

Today, for real, because of the budget and the Law 1261, they have the "signing role", right? To approve or not the funds related to the resorts policy. However, there was an argument last year, (...) and the previous COMTUR councillors, they were all dismissed, substituted by other members... From what I heard it was a political dispute, but I do not know details about it... (Risspoli, R. P., personal communication, April 18, 2018).

Similarly, the Secretary of the Tourism Department of Atibaia recognizes:

The mayor can say: 'I do not agree with this [COMTUR's decision]'. Then what can be done? You cannot put a veto into it, but you can miss the deadline [for applying to the funds], for example (Leal, B. P., personal communication, April 16, 2018).

Hence, it becomes evident that the consolidation of the COMTURs as a decision-maker organization is directly related to their ability to cope with the political realm and balance these
different interests, reflecting what Gohn (2011) discussed about the difficulty of local councils to overcome external pressure to undermine their powers.

In this context, considering the situation of the study case of Atibaia, there is another important organization which has a key role in the resorts policy governance scheme, altogether with the local government and COMTUR: the Atibaia and Region Convention & Visitors Bureau (ARC&VB\(^41\), or just Convention), which is a non-profit organization that represents the private sector, aiming to foster and promote the tourism sector in Atibaia and its region, especially regarding business tourism\(^42\), a key topic for the majority of the organization members: hoteliers.

According to the president of the organization, the Convention was only consolidated in Atibaia by the impact of the city’s title as a resort:

> I believe the Convention only managed to be established because of the resort title. (...) Because at the time there were no resort cities - there were just a few, and Atibaia already had the title, so it made things easier (Fontes, M. R. O., personal communication, April 13, 2018).

Nowadays the organization works together with the local government and COMTUR in the decision-making sphere of tourism development in Atibaia:

> We are involved in everything that happens in the [Local Tourism] Council and in the Department of Tourism (Fontes, M. R. O., personal communication, April 13, 2018); and [Tourism] planning has to be aligned to all tourism spheres: City Hall, COMTUR, which is the civil society, and Convention, the private sector (Risspoli, R. P., personal communication, April 18, 2018).

Therefore, as the quotes above suggest, actors from these organizations take part in the same discourse coalition (Hajer, 2005), which is more closely analysed in the next item, where different discourses are detailed.

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\(^41\) Atibaia e Região Convention & Visitors Bureau is the official name of the organization, in a mix of Portuguese and English.

6.2.2 Growth or Development?

Taking into account the institutional documentary framework of the resorts policy, which currently has the Laws 1.261/2015 and 16.283/2016 as its basic pillars, it is significant that there is absolutely no goal or definition of what kind of tourism development the resorts policy supports. The closest the policy gets to a definition concerns the kind of projects the FUMTUR is entitled to finance, which at least highlights the fund’s priority areas: betterment, environmental preservation, urbanization and tourist services and facilities (São Paulo, 2016, Art. 1).

Still, there is no blueprint or other kind of resorts policy-related document which set what the policy aims to achieve (e.g. stronger tourism industry in the state? Better quality of life for citizens?). According to my documentary research, there has never been one in all the resorts policy existence. Thus, although being a policy associated to tourism development, there is no clue of what tourism development we are talking about. Such lack of vision is expected to facilitate existing dominant discourses to influence how decision-makers shape the policy in its implementation processes, since there is no guideline at the policy level that can be criticized by opposing discourses, or, in Beedham’s (1991, p.19, as cited by Stoker, 1998, p.21) words: “no established rules” enabling an assessment of legitimacy.

Yet, if there are no resorts-policy documents which stress what kind of tourism development is expected within the policy framework, the document named “2018’s Guide for the Creation and Strengthening of Local Tourism Councils” of the Tourism Department of the state of São Paulo reveals the dominant discourse and clarifies what kind of tourism development is supported by the organization as a whole:

The creation of a correct [emphasis added] Local Tourism Council is the first step to think about an integrated development of actions which aim to consolidate the tourist activity as an important engine of economic development, cultural and social appreciation and environmental preservation [emphasis added], which allows tourists and residents to have a bigger contact with their history, heritage and cultural and environmental richness (São Paulo, 2018, p.5).
An interesting metaphor which emerges from this quote is the “correct Local Tourism Council”, which implies the existence of the incorrect type. This notion is probably related to the true deliberative format of the COMTURs, which differs from the ones which are just consultative or just have the “signing role”, as previously mentioned by the Atibaia’s COMTUR president in item 6.2.1.

Moreover, the usage of the metaphors “development” for economy, “appreciation” for culture and society, and “preservation” for the environment is not accidental. The subtle meaning of this storyline can be interpreted as: While culture, society and the environment are elements which should be appreciated and protected, the economy should be actively developed by the tourism activity. Such storyline is directly related to the definition of tourism growth, which, as discussed on Chapter 3, is primarily concerned with economic benefits.

As an illustration, in the search for definitions of tourism development in the website of the state of São Paulo, I came across with the following quote from a politician who has twice been elected as the governor of the state: “(...) Tourism is, above all, a big business” (Portal do Governo, 2005).

As already mentioned in the previous section of this chapter, this business-oriented discourse also emerged with decision-makers at the local level:

One thing that I also think the [Tourism] Department [is responsible for] is to make feasible the generation of one type of tourism which adds value, as business, as money being generated, as investment (Leal, B. P., personal communication, April 16, 2018).

This opinion, coined by the Secretary of the Tourism Department of Atibaia, perfectly matches the governor’s aforementioned discourse, revealing the concept of tourism growth discussed by Hall (2010). However, considering the local level, even actors inside the same discourse coalition have different views on the matter, as the following quote from the Convention’s president shows:

Tourism in Brazil is not taken seriously. So it has a very low position in the government’s priority list. And we even understand that. What we do not understand, what we always want to stress, is that it brings quality of life [emphasis added], it brings economic development (Fontes, M. R. O., personal communication, April 13, 2018).
These different storylines exemplify what Hajer (2005) mentioned about the fact that people from the same discourse coalition work together even if they individually do not share the same values. Yet, even if the topic of quality of life goes beyond the economic paradigm of the tourism growth concept, so far tourism development has mainly brought benefits for the people at the central areas of the city, with little interest in the periphery, suggesting that this improvement of quality of life has been available only to a few, which are presumably not part of this elite who has the power to decide which areas of the city receive investments, attesting the issues of representativeness raised by Abramovay (2001) and Gohn, (2011), more closely discussed in the next item.

6.2.3 Representativeness

Initial analysis of the network of actors who are part of the discourse coalition revealed significant overlap between the three organizations part of the governance scheme, especially involving the actors in the highest positions:

Table 9 – Actors at highest positions and their affiliations

<table>
<thead>
<tr>
<th></th>
<th>Local Government</th>
<th>Local Tourism Council (COMTUR)</th>
<th>Atibaia and Region Convention &amp; Visitors Bureau (Convention)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Secretary of the Tourism Department of Atibaia</td>
<td>Member</td>
<td>Member</td>
<td>His family’s hotel is affiliated to the organization</td>
</tr>
<tr>
<td>COMTUR’s president</td>
<td>-</td>
<td>Member</td>
<td>His family’s company is affiliated to the organization</td>
</tr>
<tr>
<td>Convention’s president</td>
<td>-</td>
<td>Member</td>
<td>Member</td>
</tr>
</tbody>
</table>

Source: Author.

As the Table 9 shows, all these three actors are affiliated, directly or indirectly, to both the Local Tourism Council and the ARC & VB. This situation is not a coincidence, but a result of active engagement of actors from the tourism sector to maintain the higher positions on these organizations. According to interviewees, such effort aimed to counterbalance the practices associated to the political allotment system, which, as discussed on Chapter 2.0, quite often
empower people with questionable capacity and/or ethics. Such was the case some years ago in Atibaia:

(...) he [previous mayor] brought someone, named [redacted], who was the Secretary of the Tourism Department, but the guy was not from Atibaia. It was something like: [he] wanted to bring this particular guy, from Brasília43 or anywhere else, and [he] was not staying here... he used to come once a week (Leal, B. P., personal communication, April 16, 2018).

At the time, in 2012, the ARC&VB organized a protest, releasing a document titled “Public Manifest of Atibaia’s Tourism44”, which lobbied against a negligence of the local government towards the tourism sector (ARC&VB, 2012). As a result, the next (and still current) mayor appointed a representative from the so called “tourist trade” as the new Secretary of the Tourism Department. This “tourist trade” term is, in fact, a recurring metaphor used not only in this manifest, but, considering both interviews and participant observation experiences, also in the storylines of different actors from the COMTUR, revealing cohesion between its members, consequently highlighting the strong social relation between them:

In the next [mayor's] term of office, for example, we have to strive to claim, for real, that the next representative, the next [COMTUR's] president, above all, is not a choice of the mayor. It should be a choice of the trade, right? The tourism society [emphasis added] (Risspoli, R. P., personal communication, April 18, 2018).

On the other hand, this cohesion overshadows the boundaries between Convention (private sector) and COMTUR, which is an organization tailored to be a “place for discussion, to orientate everything that involves tourism for the population, for the city (...)” (R).

As actors outside of the “trade” claimed, this unclear distinction between private and public realms inside the Local Tourism Council raise questions about its legitimacy to deliberate about tourism development on behalf of the entire population:

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43 Brazil’s capital city.
44 *Manifesto Público do Turismo de Atibaia*, in Portuguese.
We are back to that vicious situation of... this one represents the hoteliers, from the hotel X, so he lobbies for this hotel X, you got it? So it is different. Are tourism technicians well represented? Are there people graduated on tourism there? Are there people from the university? From a management background? I do not think so (Tricoli, J. R., personal communication, April 13, 2018).

The situation is, most of the people who are part of the COMTUR today, they are people who offer tourist products, so they want to promote, promote their products. Only a few think about society as a whole (Vogel, L., personal communication, April 18, 2018).

Suggestively, the 2009’s Tourism Master Plan of Atibaia, prepared by a private consultant company, also stated:

(…) Atibaia’s COMTUR is very active, focusing at the orientation, promotion and management of tourism development in the city. It has 18 councillors of the tourism trade, aiming to defend the interests of the tourism entrepreneurs of the city [emphasis added], as well as strengthen and promote the tourist activity in the municipality (…) (Indústrias Criativas, 2008, p.24).

These opposing discourses clearly highlight an aspect which is not recognized by the members of the discourse coalition (i.e. members of the “trade”). As claimed in the Public Manifest of Atibaia’s Tourism, the “trade” acknowledge their interests as the city’s interests:

We want to register in words all the knowledge we accumulated through these years, we saw our proposals being neglected on behalf of other actions which do not suit public interest goals [emphasis added] (ARC&VB, 2012, p.4); and

Now is the time to change, we are not going to allow anymore the individual will to overrule the public one [emphasis added] (ARC&VB, 2012, p.5).
Such type of strategy clearly reveals an intention of the “trade” to simulate consent from the people they aim to represent in order to impose the legitimacy of the group (Beedham, 1991, as cited by Stoker, 1998), presenting themselves as the embodiment of the public interest regarding tourism development, and thus strengthening the dominant business-discourse.

Therefore, in the context of the resorts policy in Atibaia, decision-making organizations can be questioned in what regard their role as representatives of the public interest, since the local government is systematically prone to political interference related to the practices of the political allotment system, and the COMTUR, even being a civil society organization, is arguably oriented towards the private sector, due to the entrepreneurs’ members active role in it. Such situation confirms my last research hypothesis which expected a network of actors at the local level constituted by members of the elite, thus compromising a sustainable practice of tourism (Beni, 2003).

Yet, as my own participative observation attested, the Local Tourism Council (COMTUR) is open for anyone who wants to participate in its discussions. Accordingly, after every interview with actors from the COMTUR, there was always an invitation – sometimes almost a plea, for me to participate in the council now that I am studying about it. Such fact helps to not demonize the organization and the role of the private sector in it, calling for a more in-depth analysis of the representativeness issue. As the COMTUR’s president affirms:

(...) the organization of topics is a very big challenge, to keep the councillors interested and motivated. Even regarding the political debate, so you can, in that case, invite [public official to talk about] new topics, so they can come and participate in the political discussions, proposals for new projects, this is very important. The involvement of the City Council is important, [but] it is very difficult, the same with the involvement of the City Hall (Risspoli, R. P., personal communication, April 18, 2018).

Similarly, one of the interviewees who is an experienced politician and local leader, and, important to say, not part of the “trade” and its discourse coalition, recognized the difficulty to involve citizens in participative processes:

So I think it is the product of a lack of political knowledge, lack of information, even lack of citizenship. I think people have to be conscious that either they participate, supervise,
follow, control, or it will not work. (...) Any country which claims to be developed has a participation rate infinitely bigger than ours. Here [in Brazil] the volunteer activity, community-based, is very big, but it is associated to the Church, to Non-governmental organizations. (...) If everyone participates, then it becomes easier to the politician. Here there is this deformation, no one participates (Tricoli, J. R., personal communication, April 13, 2018).

Such statement clarifies the debate about representativeness, shedding a light at a topic which is as important: participation. This structural issue reflects what Villaça (1999) argued concerning the future of urban planning in Brazil and the need of poor citizens to politically organize themselves and request their rights. So is the case regarding tourism development.

### 6.3 A study case inside the study case: Rural Tourism in Atibaia

As previously discussed in this chapter, the outcomes of the resorts policy in Atibaia have reinforced an existing segregated space, concentrating tourism development investments on central areas of the city and thus compromising a sustainable approach for tourism development which embraces different society groups within different areas of the municipality. Although this analysis is accurate for the period analysed by the research (2006 – 2017), the case of rural tourism serves as one potential example which could go against this trend, entailing the possibility of new paradigms for tourism development.

#### 6.3.1 A beacon of hope for sustainable tourism

As exposed on Chapter 5.0, the income of workers from the agricultural sector in Atibaia is significantly lower than the income of workers from other sectors, an aspect which has probably contributed to a decrease on the agriculture’s employability level in recent decades. In this context, rural tourism appears as a significant potential agent of sustainable tourism development, since it affects people from the periphery and, presumably, with bigger social vulnerability. As stated by the Rural Tourism Councillor of the COMTUR of Atibaia:

> “So it [rural tourism] has been generating jobs for the local resident, for a cooker, for a cleaning lady, for a manager, for someone of the administration. So I think that, with these projects, it has been increasingly growing. So I know that someone who works
today at Fazenda Paraíso won't need to catch a bus, or use a car, a motorcycle, to come to Atibaia's city centre to work, for instance, at the commerce. This person will have the same income as if she was working there, or even more, but being closer to her home, without all the stress...” (Reck, A. P., personal communication, April 20, 2018).

In this context, the resorts policy is crucial to provide the necessary funds for investment:

“(...) the idea is to bring the tourist to a rural propriety which is formatted [emphasis added], with infrastructure, street lighting, with even mobile phone connection. So the idea is to have access. If it rains, an ambulance is still able to arrive, you know?” (Leal, B. P., personal communication, April 16, 2018).

Similarly to the “tidy” metaphor previously discussed, the “formatted” one clearly shows a benchmark which enables an area to be able to receive tourists in the perspective of decision-makers. Such kind of investments though, regardless of its obvious focus on the tourist, produces mutual benefits to both tourists and residents of areas which, until now, lacked proper attention from the public realm. Accordingly, although in its initial steps, rural tourism has been planned to have a big impact in the city:

“And now we will build a new scheme, going in each property owner - for example last week we went to one of grapes and peaches - and build a [tourist] tour including them, with opening times. So, I think this can prevent this [rural] exodus, so people can stay there, because we will bring the people [tourists] there to consume in the properties” (Leal, B. P., personal communication, April 16, 2018).

However, being part of a wider context, rural tourism also suffers from the same participation issue which affects the COMTUR as a whole:

“As you see, we don't have inside the COMTUR, yet, someone occupying the rural producer position [as a councillor]. So the rural producer is still, let's say, very skittish [emphasis added]. He is not as participative. On what concerns the representatives of
[rural] restaurants, emporia and so on, they are participative, and we are having a lot of help and interconnection with the City Hall” (Reck, A. P., personal communication, April 20, 2018).

Such eagerness of the private sector is characteristic of the sector’s role involving entrepreneurship. Likewise, “skittish” behaviour from rural producers is very likely related to their own traditional and more reserved manners, not easily assessed by business-oriented mindsets:

I think that, tourism [sector] itself, the rural part, understood the importance of the partnership with the City Hall, and the City Hall likewise. But not yet the rural producer. He has not... awaken for this market niche [emphasis added], I think (Reck, A. P., personal communication, April 20, 2018).

Illustrative of the participation issues discussed earlier on the previous section, the difficulty of engaging rural producers has been repeatedly mentioned in the interview with the COMTUR’s Rural Tourism Councillor, who several times manifested her frustration with their lack of involvement:

They... I do not know if they are afraid, if they think they do not have a lot of qualifications... And so you know: they are super strong, great producers, but they are not participative. In what concerns rural tourism (Reck, A. P., personal communication, April 20, 2018).

Yet, there are some possible ways to increase representativeness:

I think this is missing, the invitation. Go there, take them by the arm and say: "Shall we go there? Shall we go there [Local Tourism Council] to get to know it? It is nice, it is interesting, there will be no obligations". Then the person goes, like it, and keep participating. It was like that with Cijó [dairy producer]; "Let's go there, I want to introduce you". He liked it, and he is participating, and I think he will run in the elections for the

Hence, although so far tourism development in Atibaia and the related investments associated to the resorts policy have failed in fostering a sustainable approach for tourism development, rural tourism can benefit of a “market niche” to improve the quality of life of a part of the population which have been historically ignored by decision-makers.
7.0 Conclusion

This chapter presents a summary of findings, where the analysis and discussion part of the previous chapter is briefly discussed, in light of the research questions and hypotheses which guided this research.

To conclude, some research limitations are considered, and some recommendations for future research are outlined.

7.1 Summary of Findings

- Question related to the outcomes of the resorts policy:

  What has been the spatial distribution of the resorts-related projects in the municipality?

  - Hypothesis:

  The tourism development supported by the resorts policy focus on central areas rather than the periphery, thus reinforcing an already existing segregated space (Pivot, 2006).

  Spatial analysis was employed in the research to answer the research question above, finding that resorts-related projects between 2006 and 2017 in Atibaia were mostly concentrated in the central areas of the city, encompassing 80% of the total projects.

  As demonstrated by triangulation of data, the location of projects did not have any relation to bigger amount of residents or the presence of groups of medium or higher social vulnerability in the area, therefore confirming the hypothesis of spatial segregation, in line with other type of state interventions on space discussed by other authors (Villaça, 1999; Caldeira & Holston, 2005).

  - Question related to the implementation processes:

    How have different actors influenced the conception and implementation processes regarding the resorts-related projects?

    Hypothesis:

    A network of actors representative of the elite compromises a desired more representative outcome of the resorts policy in the city, closer to a sustainable practice of tourism (Cruz, 2006; Pivot, 2006).
In order to answer this question, this research employed discourse analysis to evaluate the discourses of documents and actors related to the resorts policy. The research findings showed that actors, organizations and institutions had a major business-oriented discourse, revealing a discourse dominance (Hajer, 2005) connected to a concept of tourism growth (Hall, 2010) which does not entails a sustainable approach for tourism based in a balance between space, environment and economy (Gunn and Var, 2002), involving different sectors and society groups (Beni, 2003).

However, as attested by members of the Local Tourism Council in Atibaia, rural tourism represents a possibility for sustainable development, providing jobs and infrastructure for the population on rural areas, changing a trend of inequality between urban and rural, associated to the low income of workers from the agricultural sector and the lack of investments in the area.

Regarding the governance scheme of the resorts policy, the dominance of the business-oriented discourse attested the hypothesis of a network of actors from the elite, represented by a group of actors from the three main organizations (COMTUR, Convention and local government) who are part of the “tourism trade”, overshadowing different organizations' boundaries. Yet, this cohesive and dominant group was found to be crucial to prevent practices associated to the Brazilian political positions allotment system, considering the new rules of the Law 1.261/2015 alone was insufficient to transform the COMTUR of another resort city in a legit deliberative council.

As showed in this research, the empowerment of the COMTURs gives the chance for all citizens to take part in decision-making. However, while the private sector already pursue its interest and use this opportunity to influence the process, the civil society, including the periphery and its poor citizens, needs to organize themselves and participate in the same arena.

In line with that, the public sector, if it wants to have any noteworthy legitimacy to take decision on behalf of the population it represents, it must defend the interests of these groups which are marginalized and foster their political awareness, organization and empowerment.

7.2 Limitations

While the research was successful in attesting the hypotheses and answering the research questions, there are some limitations which should be taken into account:
In the first place, as previously mentioned in Chapter 4.0, time constraints prevented me from interviewing more actors and participating in more events as a participant observer. Thus, considering different conditions, with more time, state level actors could be involved, perhaps providing not only different discourses, but also materials about the case study which I did not manage to have access. More information about older resorts-related projects, for example, would be extremely valuable. Moreover, a longer period to write the thesis and conduct the research could provide the opportunity to perform a comparative study, involving a different resort city into the analysis, which could give interesting insights about the implementation processes and outcomes of the resorts policy in different places.

Secondly, different choices on methodology could provide other types of material which my choice of methods did not manage to collect. Surveys and focus groups, for example, could make emerge different kinds of information, related to the distinct characteristics of these methods. In addition, a different choice of approach for tourism development, focused on environmental protection, for example, would probably make emerge other type of issues and discourses, giving a different perspective about the relation between the resorts policy and sustainable development and tourism.

Lastly, a discourse analysis centred in the vast historical material available about resorts cities - including poems, newspaper articles, pictures and promotional material - could give an excellent insight about how the resort cities were portrayed and advertised, which could serve as a basis for a study on how the resorts policy shaped the current stage of tourism development in these cities.

7.3 Recommendations for future research

The most evident future research area which emerged throughout the research process relates to rural tourism, an activity which is still being implemented in the resort city of Atibaia, with great possibilities to foster a sustainable approach for tourism.

A research which encompasses different public policies can also assess a more multidimensional perspective on state interventions on space, which can be particularly valuable in an analysis centred in the periphery, for example, revealing if there is a synergy or not between investments in areas which are not central.

Another useful analysis could encompass a comparison between the money provided by the resorts-related funds and the money spent in the resorts-projects, checking if there is a clear
correspondence between the budget and the expenses, potentially revealing mismatches which can be very useful for a clear picture of how the resorts-related money is actually employed by municipalities.

7.4 Critical reflection on work

The final version of the thesis conceals some diversions which I had throughout the research process. As an example, the initial idea of the research was to study the linkage between urban and tourism planning at the local level. However, literature review for these areas presented me an extensive literature about urban planning, and very few papers about tourism, especially the resorts policy, which has been widely ignored by the academy, motivating me to make a research about the topic.

Yet, this change of tracks impacted the time management of the research, reducing the already limited time to carry out the research and write the Master’s thesis. Although I paid a high price for such change in the middle of the way, it is rewarding to see the final version of this paper.
8.0 References


<table>
<thead>
<tr>
<th>ANO EM QUE O CONVÊNIO FOI SINDADO</th>
<th>OBJETO</th>
<th>TIPO</th>
<th>LOCAL DE EXECUÇÃO</th>
<th>VALOR REPASSADO</th>
<th>SITUAÇÃO</th>
</tr>
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<td>2006</td>
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**Explanatory note:** The first column shows the year the project was authorized to be implemented by the state (which provides the funds); the second column presents the object of the project; the third its type (broadly speaking); the fourth its location (also broadly speaking); the fifth the cost of it and the last column show the situation - if it has already been finished, if it has been built or if it has been approved on paper.
APPENDIX B – Agreement Form

I, ____________________________________________________________, representative of __________________________________________________, affirm my voluntary participation in the research carried out by Mr. Francisco Napolitano Leal, Master’s student of the Planet Europe Programme, who is researching about the resorts policy of the state of São Paulo.

By this mean the researcher is committed since the beginning to share with me the interview transcripts, so I can evaluate it before it is published. I also manifest my knowledge about my right to request anonymity, or, if I want, to remove parts of the interview, or even the interview as a whole, from the final form of the researcher’ thesis

_______________________________________________________________

Signature Interview

_______________________________________________________________

Signature Researcher
Interviewee Identification (Secretary of the Tourism Department of Atibaia)

- Full name, qualification/experience, service time

Organization Role

- What is the role of the Tourism Department regarding the tourism development of Atibaia?
- What kind of tourism does the Department foster?
- Is there any focus regarding activities or areas of the city?
- Is there a focus in any of the department’s projects?

Relation Tourism Department and others

- What is the relation between the Tourism Department of Atibaia and the city’s COMTUR?
- Do you believe actors related to tourism are well represented in the COMTUR? Do you think it would be beneficial to change its composition? (include/remove members of other associations/groups/organizations?)
- What is the relation between the Tourism Department of Atibaia and the Convention?
- Does the fact you were a member of the directory board of the Convention between 2005 and 2013 influences this relationship?
- What is the relation between the Tourism Department and other actors of the tourism sector of the city, those which do not take part of the COMTUR or Convention (e.g. companies, associations, trade unions, etc.)?
- What is the relation between the COMTUR and the population of Atibaia?

Resort City

- In your opinion, how the title of “resort” affects the city of Atibaia?
- Do you know if there are other sources of funds for tourism development at the local level besides the resorts-related funds?
- Who is the responsible to elaborate tourism projects inside the COMTUR, and who choses which project will be implemented? The TMP 2018 cites, for example, a Communication and Marketing Plan for the promotion of the city approved by COMTUR, using the resorts-related funds.
- In the list of projects financed by the resorts-related funds I managed to access, there is a significant variation between each year’s available funds. Do you know the reason for such variation?

Tourism Master Plan

- In 2009 a company was contracted to produce the first Tourism Master Plan of the city of Atibaia. Three years later, in 2012, organizations of the tourist sector drew up the “Public Manifest of Atibaia’s Tourism”, pointing out a negligence of the City Hall regarding the document. Do you have any idea of the reason for this attitude of the local government?
- Last week the TMP 2018 was approved by the City Council of Atibaia. What are your expectations regarding the implementation of this document and its role in the development of tourism in the city in the next years?
- The TMP 2018 established the following groups and activities as the main concerns of the tourism of the city:
  - Families with children (leisure and rest)
  - Couples without children (leisure and rest)
- One-day visitors (leisure and rest)
- Environment and Adventure
- Business events

Do you know why the historical tourism, rural tourism and religious tourism were not part of this list of target groups and priorities?

- The TMP 2018 showed that the average income of a household in the rural area is 53% (R$505,00) of the average income of a household in the urban area (R$939,00). Considering this, is there any project from the Tourism Department which concerns the population in rural areas?
- In line with the previous question, the TMP 2018 affirmed that one of the most traditional cultural groups of the city – the Congada, has all its members in the periphery of Atibaia (p.19). Besides that, the document also recognizes that the periphery lacks proper infrastructure (p.134). Are there any plans of the Tourism Department to mitigate these deficiencies?
- The TMP 2018 also argues that:

The vertical growth of the city can contribute to the evasion of second home tourists who seek green, peace and quiet in order to rest” (pg138)

"The City Master Plan must balance the growth of the industry taking into consideration the tourism space” (pg139)

- How does the relation of vertical growth/industrialization x green/tourism happen? Does the Department of Tourism influence the City Master Plan and the zoning code of the municipality for example? How does this inter-sectorial relation happen?

Thank you very much for the participation in the research. Would there be anything you would like to add regarding the topics we have talked about or anything else within this subject?
Interviewee Identification (President of the Atibaia e Região Convention & Visitors Bureau)

- Full name, qualification/experience regarding tourism, position in the organization

Organization role

- What is the role of the ARC&VB for the tourism development of Atibaia and its region?
- What kind of tourism does the ARC&VB foster?
- Is there a target group for such type of tourism?
- In the “Diretório” document provided by the Convention’s website, there is a reference for ecotourism, historical tourism, rural tourism and cultural tourism of Atibaia and it region. How the Convention works together with these types of tourism?

Relation between organization and others

- I found the information that, in a recent period, at least two Secretaries of the Tourism Department of Atibaia were part of the Convention: the former Secretary, Jaime Santos, and also the current one, Bruno Leal. Therefore, how the relation between the Tourism Department and the Convention works? Did this relation changed before and after these Secretaries assumed?
- Besides the Secretary of the Tourism Department, the current president of the Local Tourism Council, Raphael Risspoli, has also used to be a member of the Convention’s board of directors in the past. Nowadays, that is the relation between the Convention and COMTUR?
- Besides the City Hall and COMTUR, what is the relation of your organization with other actors from the tourism sector in the region, considering both private sector and civil society?

Resort cities and Tourism development

- In your opinion, how the title of “resort” affects the city of Atibaia?
- Does Atibaia’s title of a resort city affect your organization’s activity?
- Does the Convention participate in the processes related to the resorts policy implementation, such as conception, discussion or choice of projects to be financed by the resorts-funds?

Tourism Master Plan

- In 2012 the ARCV&B helped to write the "Public Manifest of Atibaia’s Tourism". Can you tell us about this document and the context at the time?
- The Manifest pointed out a negligence of the City Hall regarding the document. Do you have any idea of the reason for this attitude of the local government?
- This week, the TMP 2018 was approved by the City Council of Atibaia. What are your expectations regarding the implementation of this document and its role in the development of tourism in the city in the next years?
- What was the role of the ARC&VB in this new TMP conception?

Thank you very much for the participation in the research. Would there be anything you would like to add regarding the topics we have talked about or anything else within this subject?
Interviewee Identification (COMTUR’s President)

- Full name, qualification/experience regarding tourism, service time

Organization role

- What is the role of the COMTUR for the tourism development of Atibaia?
- The Law nº 3.076/00, which established the COMTUR in Atibaia, defined the organizations which would have a chair as Councillors in the COMTUR. Within each of these organizations, who choose the members to be part of the Local Tourism Council?
- Is the COMTUR’s president chosen by the members of the Council?
- What are the challenges of your position? And the challenges the COMTUR face?
- Do you believe actors related to tourism are well represented in the COMTUR? Do you think it would be beneficial to change its composition? (include/remove members of other associations/groups/organizations?)

Relation COMTUR and others

- What is the relation between the COMTUR and the Tourism Department of Atibaia?
- What is the relation between the COMTUR and the Convention?
- Does the fact you were a member of the directory board of the Convention (2014-2015) influences this relationship?
- What is the relation between the COMTUR and other actors of the tourism sector of the city, those which do not take part of the COMTUR or Convention (e.g. companies, associations, trade unions, etc.)?
- What is the relation between the COMTUR and the population of Atibaia?

Resort city

- In your opinion, how the title of “resort” affects the city of Atibaia?
- Do you know if there are other sources of funds for tourism development at the local level besides the resorts-related funds?
- Who is the responsible to elaborate tourism projects inside the COMTUR, and who choses which project will be implemented?
- In the list of projects financed by the resorts-related funds I managed to access, there is a significant variation between each year’s available funds. Do you know the reason for such variation?
- The Law 1.261/2015 required resort cities to have a COMTUR and prepare a Tourism Master Plan every 3 years. However, Atibaia’s COMTUR is much older than the law. Was there any change of the Council’s role after this law? Did it change the relation with the Local Tourism Department?
- Do you think there is an area (e.g. urban/rural area, a neighbourhood, a part of the city, etc.) which receives more investments and attention from the tourism sector? If so, why do you think this happens?
- Is there any project or type of tourism which the COMTUR focus, related to its view of the desirable tourism development for the city?

Tourism Master Plan
In 2012 the ARCV&B and the COMTUR wrote the “Public Manifest of Atibaia’s Tourism”. Can you tell us about this document and the context at the time?

The Manifest pointed out a negligence of the City Hall regarding the document. Do you have any idea of the reason for this attitude of the local government?

This week, the TMP 2018 was approved by the City Council of Atibaia. What are your expectations regarding the implementation of this document and its role in the development of tourism in the city in the next years?

What was the role of the COMTUR in this new TMP conception?

Thank you very much for the participation in the research. Would there be anything you would like to add regarding the topics we have talked about or anything else within this subject?
Interviewee Identification *(Former mayor of Atibaia, and former Secretary of the Tourism Department of the State of São Paulo)*

- Full name, qualification/experience regarding tourism

Department of Tourism of the State of São Paulo

- You were the Secretary of Tourism of the State of São Paulo in 2016. At the time, what was the kind of tourism that was aimed to be promoted in the State of São Paulo?
- Who would be, in your opinion, the main actors involved in this kind of tourism?
- Was there any project/policy which was focused by the department at the time?

Resorts Policy

- You are one of the authors of the Law 32/2012, which would later become the Law 1.261/2015, that updated the legislation of the resort cities of the State of SP. Would you please tell us about the importance of the resorts policy as a whole, and the reason for this change/updating?
- As a former mayor of Atibaia for two consecutive terms (2001-2008) would you be able to tell me what the importance of the resorts policy to the city in that period was? Was there any activity or area of the municipality that was considered priority?
- Would you be able to say who were the actors that were more influential on the decision-making in the tourism of the city? Who participated in the conception phase of the resorts-related projects?
- Do you believe that there has been any change regarding the tourism development in the municipality since 2001?

Tourism Master Plan

- In 2009 a company was contracted to produce the first Tourism Master Plan of the city of Atibaia. Three years later, in 2012, organizations of the tourist sector drew up the "Public Manifest of Atibaia’s Tourism", pointing out a negligence of the City Hall regarding the document. Do you have any idea of the reason for this attitude of the local government?
- This week, the TMP 2018 was approved by the City Council of Atibaia. What are your expectations regarding the implementation of this document and its role in the development of tourism in the city in the next years?

Thank you very much for the participation in the research. Would there be anything you would like to add regarding the topics we have talked about or anything else within this subject?
Interviewee Identification (Rural Tourism Councillor in the Local Tourism Council)

- Full name, qualification/experience regarding tourism, position in the organization

Organization role

- You are the representative of Rural Tourism inside the COMTUR in Atibaia. Who are these actors/organizations that you represent?
- What is the rural tourism that Atibaia offers today to the visitor?
- Is there any target group for this rural tourism?

Relation between organization and others

- What is the relation of the rural tourism sector with the local government (especially the departments of agriculture and tourism)?
- What is the relation between the rural tourism and Convention?
- What is the relation between the rural tourism sector with the rural workers/producers of Atibaia?
- What is the relation of the rural tourism sector with the population of Atibaia as a whole?

COMTUR

- Nowadays the COMTUR, altogether with local Tourism Department, deliberates about the investments regarding tourism development in Atibaia. Do you believe actors related to tourism are well represented in the COMTUR? Do you think it would be beneficial to change its composition? (include/remove members of other associations/groups/organizations?)
- You mentioned with me before the interview that the Councillor chair for the Rural Producers inside the COMTUR is empty at the moment. Do you think there is an interest of the rural producers to participate in the Council? How do you think the organization could motivate them to participate?
- The rural tourism sector has not have a Councillor chair within the COMTUR until 2012, when the Law nº 4.113/2012 changed this. Do you know what the context was at the time which allowed the rural tourism to join the Council?

Resort cities and Tourism development

- In your opinion, how the title of “resort” affects the city of Atibaia?
- Is there in your opinion a focus of the tourism development fostered by the Tourism Department of the city?
- Do you think there is an area (e.g. urban/rural area, a neighbourhood, a part of the city, etc.) which receives more investments and attention from the tourism sector? If so, why do you think this happens?

Tourism Master Plan

- The TMP 2018 showed that the average income of a household in the rural area is 53% (R$505,00) of the average income of a household in the urban area (R$939,00). Considering this, how do you think rural tourism could improve the condition of the families who live in the rural area?
- Do you think the population in rural areas and other parts which are far from the city centre benefit from the tourism development of the city?
Thank you very much for the participation in the research. Would there be anything you would like to add regarding the topics we have talked about or anything else within this subject?
Interviewee Identification (Coordinator of folklore and popular culture)

- Full name, qualification/experience regarding tourism, position in the organization

Organization role

- What is the role of the Coordinator of folklore and popular culture (CFPC) of the city of Atibaia?
- Is there a target group for these cultural activities?
- What is the relation between these activities and tourism? Is tourism beneficial for these activities and their participants?

Relation between organization and others

- What is the relation between the CFPC and the Tourism Department of Atibaia?
- Is there any relation with the Convention? What about the COMTUR?
- Nowadays the COMTUR, altogether with the local Tourism Department, deliberates about the investments regarding tourism development in Atibaia. Do you believe actors related to tourism are well represented in the COMTUR?
- What is the relation between the CFPC and other associations and organizations?
- What is the relation of the CFPC with the population of Atibaia?

Resort cities and Tourism development

- In your opinion, how the title of “resort” affects the city of Atibaia?
- Is there in your opinion a focus of the tourism development fostered by the Tourism Department of the city?
- Do you think there is an area (e.g. urban/rural area, a neighbourhood, a part of the city, etc.) which receives more investments and attention from the tourism sector? If so, why do you think this happens?

Tourism Master Plan

- The TMP 2018 established the following groups and activities as the main concerns of the tourism of the city:
  - Families with children (leisure and rest)
  - Couples without children (leisure and rest)
  - One-day visitors (leisure and rest)
  - Environment and Adventure
  - Business events

Considering that, what are the perspectives for tourism development regarding folklore and popular culture in Atibaia?

- The TMP 2018 identifies that all Congada groups come from the periphery of the city. Why do you think this spatial characteristic exists?
- Do you think the population in rural areas and other parts which are far from the city centre benefit from the tourism development of the city?

Thank you very much for the participation in the research. Would there be anything you would like to add regarding the topics we have talked about or anything else within this subject?
APPENDIX D – Example of translation and association to a wider concept

| “A criação de um correto Conselho Municipal de Turismo é o primeiro passo para se pensar no desenvolvimento integrado das ações que visam consolidar a atividade turística como um importante motor do desenvolvimento econômico, da valorização cultural, social e da preservação ambiental, que possibilite turistas e moradores o maior contato com a sua história, seus patrimônios e riqueza cultural e natural” (São Paulo, 2018, p.5). | The creation of a correct Local Tourism Council is the first step to think about an integrated development of actions which aim to consolidate the tourist activity as an important engine of economic development, cultural and social appreciation and environmental preservation, which allows tourists and residents to have a bigger contact with their history, heritage and cultural and environmental richness (São Paulo, 2018, p.5). | **Tourism Development/Tourism Growth** |
| “O turismo no Brasil não é levado a sério. Então ele na escala de prioridades do governo, ele é lá embaixo. E a gente entende até isso. O que a gente não entende, o que a gente quer sempre reforçar, é que ele traz qualidade de vida, ele traz desenvolvimento econômico” | Tourism in Brazil is not taken seriously. So it has a very low position in the government's priority list. And we even understand that. What we do not understand, what we always want to stress, is that it brings quality of life, it brings economic development (Fontes, M. R. O., personal communication, April 13, 2018). | **Tourism Development/Tourism Growth** |
| “É que assim, a maioria das pessoas que 'tá fazendo parte do COMTUR hoje, elas são pessoas que elas têm produtos turísticos. Então elas querem alavancar promoções para os seus produtos. São poucas as que pensam na sociedade como um todo” (Vogel, L., personal communication, April 18, 2018). | “The situation is, most of the people who are part of the COMTUR today, they are people who offer tourist products, so they want to promote, promote their products. Only a few think about society as a whole” (Vogel, L., personal communication, April 18, 2018). | **COMTUR’s role and its representativeness** |
APPENDIX E – Ethics Form

CARDIFF SCHOOL OF GEOGRAPHY AND PLANNING

Ethical Approval Form

Student Projects (Undergraduate & Taught Masters)

In the case of dissertations it is the responsibility of the student to complete the form, duly signed by their supervisor, and secure ethical approval prior to any fieldwork commencing. A copy of the form should be included with their final dissertation.

Title of Project:
Analysis of the resettlement policy of the state of São Paulo, Brazil

Name of Student(s):
Francisco LéaL

Name of Supervisor/Module Leader:
Richard Cowell

Degree Programme and Level:
Planet Europe, Master’s

Date: 01/02/2018

Recruitment Procedures:

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<td>Does your project include people in custody?</td>
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<td>Is your project likely to include people involved in illegal activities?</td>
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<td>Does project involve people belonging to a vulnerable group, other than those listed above?</td>
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<td>Does your project include people who are, or are likely to become your clients or clients of the department in which you work?</td>
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<td>Does your project include people for whom English / Welsh is not their first language?</td>
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**Consent Procedures:**

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<td>Will you tell participants that their participation is voluntary?</td>
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<tr>
<td>9</td>
<td>Will you obtain written consent for participation?</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>If the research is observational, will you ask participants for their consent to being observed?</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Will you tell participants that they may withdraw from the research at any time and for any reasons?</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Will you give potential participants a significant period of time to consider participation?</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

**Possible Harm to Participants:**

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>Is there any realistic risk of any participants experiencing either physical or psychological distress or discomfort?</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Is there any realistic risk of any participants experiencing a detriment to their interests as a result of</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
If there are any risks to the participants you must explain in the box on page 4 how you intend to minimise these risks

**Data Protection:**

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Will any non-anonymised and/or personalised data be generated and/or stored?</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Will you have access to documents containing sensitive data about living individuals?</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>If “Yes” will you gain the consent of the individuals concerned?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If there are any other potential ethical issues that you think the Committee should consider please explain them in the box on page 4. It is your obligation to bring to the attention of the Committee any ethical issues not covered on this form.

**Supervisor’s declaration**

As the supervisor for this student project, I confirm that I believe that all research ethical issues have been dealt with in accordance with University policy and the research ethics guidelines of the relevant professional organisation.

Date: 12/04/18  
K. Cowell  
Signature: [Signature]

If any of the shaded boxes have been ticked the supervisor/module leader must explain in the box on page 4 of this form how the potential ethical issue will be handled.

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1 Sensitive data are _inter alia_ data that relates to racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, actual and alleged offences.
Please explain how the identified potential research ethics issue/s will be handled

Will gain verbal consent when interviewing people

We discussed the issue of informed consent in public meetings, where (participant) observation research might be conducted. Given that the meetings are public, with key actors publicly offering views, consent and consent issues do not arise.