

Draft National Tourism Policy 2015 - 2020

Reactions and feedback on the public consultation document

Due to the impact of the Tourism Industry on the quality of life of Maltese society, the Kummissjoni Interdjoċesana Ambjent (KA) has always felt the need to contribute towards the national debate about the sector by voicing its reflections in official statements¹. Consequently the KA is presenting its reactions and feedback on the Draft National Tourism Policy 2015 - 2020 published by the Ministry for Tourism for public consultation. Although frequently criticised for its *involvement in non-religious affairs* (sic), the KA is pleased to note that some of the principles it had outlined in its aforementioned statements – such as the realisation that increased tourist numbers per se is not a positive indicator – have been adopted by the current document.

Ensuring Sustainable Growth

This is the main theme of the document. The KA feels that the proposed policy is a step in the right direction towards achieving sustainable tourism. However, much is dependent on our nation's readiness to challenge flawed models of growth that have sacrificed our country's resources for the immediate economic gratification of a handful while forfeiting the future development and wellbeing of the many. Nevertheless, the local tourism sector also evidences instances (and the document managed to pick up several of them) in which entrepreneurs have shown their creativity by threading new ground and investing in new niches that have been quite sustainable and consequently economically successful.

Continuing on the notion of sustainable growth, tourism – particularly in the context of a small densely populated island – is nourished and sustained by the quality of the country's environment. This is the leitmotiv of the document and the policy directions suggested seem to acknowledge this – with albeit some lingering incongruences.

¹ Kummissjoni Ambjent (2006) *Opinjoni: Turiżmu sostenibbli*. Arcidjoċesi ta' Malta.

Kummissjoni Ambjent (2006) *MTA Strategic Plan 2006-2009 – Draft for Consultation Document. Reactions, comments and suggestions*. Arcidjoċesi ta' Malta

A good quality of life

In one of its past statements, the KA pointed out that *“Sustainable tourism development cannot be achieved unless tourism is seen as a means to enhance the quality of life of the local population and see to their needs too”*. This was a direct attack at the ‘Malta for the Tourist’ approach that had characterised initiatives in this industry. The KA positively notes that the document acknowledges a good quality of life for the locals as a fundamental constituent of a strong tourism package. This is because *“tourists use, visit and experience many of the products and services used by the resident population and their experience of such products and services generally has a very strong impact on their overall rating of the visit”* (p.52). Therefore, one would suggest that MTA includes locals in its surveys to determine satisfaction levels among service users.

The four pillars of sustainable development

Locally (as elsewhere) the term ‘sustainable development’ has been used and misused to justify anything. Nevertheless, beyond official definitions, achieving sustainable development depends on striking a balance between environmental, social, cultural and economic concerns. Bearing in mind documented cases where local tourism policies were developed without any consideration of their environmental impact, the current document’s acknowledgement of the environment as an essential component in the success of the policy is a breath of fresh air in this industry. This seems to be in response to the increased demands *“... by travellers who will prefer destinations which integrate sustainability into every step of the visitor experience. Travellers [who] will base destination and service provider choices on the basis of demonstrable green credentials”* (p.5).

Regarding the cultural pillar of sustainability, the KA agrees with the document’s vision that the tourism industry needs *“a much broader definition of culture beyond historical sites, museums and traditional manifestations to include other tangible and intangible elements of Maltese life”* (p.23). Consequently, the policy needs to identify ways to promote the various features that constitute our identity and distinguish us from other nations, by valorising and protecting aspects of our culture that are being eroded due to unsustainable development and imported lifestyle choices.

Tourism zones management

In Section 7a, the document expresses concern that most tourism zones lack a distinctive identity (p. 40) and consequently *“The aesthetics and environmental quality of tourism zones need to be improved through better landscaping and a general greening of the environment, with a particular attention to detail and design”*

(p. 39). The KA feels that the 'need' for this intervention is the direct result of unsustainable development and policies that address environmental concerns as an afterthought. This problem could have been avoided altogether had the development in the sector been sustainable – reflecting the balance between the various sustainable development pillars. It is rather ironic that such 'development' (originally intended to generate revenue) ends up being a financial burden on the country – especially when one considers the expenses incurred to rehabilitate these zones as well as the missed opportunities the same zones would have offered had they not been degraded in the first place. Moreover, to instil in locals greater awareness and respect of our Maltese identity, the KA feels we should go beyond focusing on what *“is essential for image building and to meet visitor expectations.”* (p. 40).

Section 7a also raises the issue of Tourism in the South: *“Government is committed to continue with initiatives, including product improvement opportunities that have the potential to increase visitor numbers to the South, which will also economically benefit the region”* (p.40, parag.3). While agreeing in principle with this commitment, distant and not so distant experiences have shown that the South had to contend with projects that, either under the guise of “in the national interest” or of “the regeneration of the South”, have significantly contributed to the degradation of the environment in this region and hence in the quality of life of its communities. The KA is against any so called development that promotes any further deterioration of the region². Particularly vulnerable to such unsustainable development interests are the region's limited yet spectacular pockets of nature – especially the coastline – which, despite the impression they may give of being *“shabby and unused”*, if cared for and safeguarded could prove to be an asset for the tourism industry. This stretch of open countryside would then be enjoyed by all, including the *“slightly less than one in every two tourists [who] undertake walking and hiking activities during their Malta holiday”* (p.48).

The potential and vulnerability of the coast and beaches were also acknowledged and addressed by the document in Section 7e. The KA would like to point out that this habitat has already gravely suffered from past unsustainable and short sighted development related to the tourism industry. This has provided a textbook example of how unsustainable development has the uncanny ability to rebound and hit back. The document seems to usher in a new approach based on the sustainable management of these habitats... a possible indication that lessons have been learned – albeit the hard way. However, the proof of the pie is in the eating and the KA would be very interested in seeing the implementation of *“detailed assessment by the relevant competent authority and restrictions and prohibitions”* (p. 51) that would safeguard these vulnerable areas.

An innovative way of addressing the above mentioned concerns could be that of having operators in the tourism industry to actively promote and sustain

² Kummissjoni Interdjoċesana Ambjent (2015). *L-iżvilupp tal-kosta tax-Xlokk ta' Malta*.

environmental restoration projects. Besides forming part of their Corporate Social Responsibility, such actions provide an opportunity for the operators to make up for past mistakes by investing in the sustainability of their industry.

Diversifying the market

Another positive aspect of the document is its aim to diversify our tourism product by identifying different potential target groups (p.29) thus promoting the development of diverse market niches. To some extent, these niches have developed on their own and against all odds – with little if any assistance. The KA suggests that the policy actively promotes and supports this development by incentivising initiatives within these target groups. This could channel investment in sectors, such as *“gastronomy, tourism for all, sports and adventure, nature and religious travel”* (p.30) that would give these sectors the initial push needed to establish themselves. Once established these sectors would be instrumental in the distribution of visitors over the winter and shoulder months.

Employment in the sector

Section 7g addresses issues related to human resources. Competent authorities should ensure that the *“difficulty in employing local individuals in certain positions especially in customer-facing positions”* (p.56) is not an opportunity for such establishments to promote precarious work. Moreover, the sector is plagued by a relatively high amount of untrained personnel. This might explain why *“an average of around 1 in 4 tourists rate service received in these areas as ‘not so good’, ‘poor’ or ‘very poor’”* (p. 55). While applauding the policy’s planned investment in continuous personal development of staff (p.56), the KA feels that relevant authorities need to take affirmative action that would ensure the employment of qualified personnel.

Gozo – a do or die affair

The document dedicates a whole chapter to Gozo, thus acknowledging its specificity as a distinct tourism destination and its domestic tourism market. In this chapter the document highlights Gozo’s potential in the sector. Nevertheless, irrespective of its promise, Gozo could easily lose everything – with devastating consequences on its future – if its development is left in the hands of those whose main target is personal gain rather than the wellbeing of the island. Unfortunately, Gozo has its fair (sic) share of unsustainable development projects and the foot-dragging in closing once and for all certain issues, such as the Hondoq ir-Rummien proposal³, may be an

³ Kummissjoni Interdjoesana Ambjent (2010) *Opinjoni dwar l-iżvilupp propost f’Hondoq ir-Rummien*.

indication of the authorities' weakness to enforce action that would protect Gozo's heritage.

In reading through this chapter, the KA cannot help but wonder what a permanent link with Gozo would do to its "... *distinct and unique selling point one of which is perceived as a stress-free destination that offers the intrinsic value of a personal experience to share with your loved ones*" (p.62) and the impact of domestic tourism that "*has traditionally contributed handsomely to Gozo's economy and has been a highly influential factor on the economic success of the island*" (p.61).

Education for sustainable development

The policy outlined in the document necessitates a paradigm shift in the way development in the tourism industry is perceived. This shift requires a change in mentality and in the current predominant practices at all levels within the industry. Therefore, it was rather surprising that the proposed policy does not address the need for a concurrent and supportive Education for Sustainable Development (ESD) programme that goes beyond traditional CPD courses and information campaigns.

Concluding comments

The KA feels that Chapter 9, on Integrating Tourism Policy with other Policies, should clearly identify possible threats that could jeopardise the achievement of the set targets of the policy. These threats are ultimately threats to sustainability and in all likelihood they would feature as threats in any national initiative to achieve sustainable growth. Addressing and eliminating these common threats could thus be a perfect entry point to joint co-operation between different government entities and their respective policies. Replacing a fragmentary approach to achieving sustainability with a concerted effort increases the possibility of achieving our goals for a better quality of life.

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