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Ms Cathy O'Sullivan,
Tourism Policy Division,
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media,
New Road,
Killarney,
Co. Kerry,
V93 A49X

19th December 2022

Our EPAC Ref: 2822

Re: Initial consultation on a new Sustainable Tourism Policy

Dear Ms O'Sullivan,

Many thanks for the opportunity to input into the development of your new Sustainable Tourism Policy via this stakeholder consultation process. The on-line survey which was circulated was a constrained format for the EPA to provide feedback. We trust it suffices to provide our comments in this letter instead.

As the tourism sector continues to recover from the significant challenges experienced due to the Covid-19 pandemic, there is an opportunity for Ireland, through the Policy, to continue to move towards a more environmentally sustainable tourism sector. Doing so will both support the continued recovery and growth of the tourism sector, provide for the protection of our important natural and cultural heritage and ensure the sustainable use of our resources and supporting infrastructure.

It will be important that the new Policy aligns with and supports the delivery of Ireland's existing national commitments regarding environmental protection, as set out in plans and programmes such as the National Planning Framework and the Climate Action Plan 2021. It will also be important that the relationship with other key sectoral plans and programmes are appropriately considered, to ensure coherence and avoid potential conflicts.

It is important to ensure that environmental protection is prioritised in all aspects of the development of this new tourism policy, as well as any plans and programmes developed on foot of the policy, while supporting the sustainable growth of the tourism sector. The provision of adequate critical infrastructure, promotion of a circular economy and support towards achieving the 2050 Climate Neutrality goal should all be central in the development of the new policy.

Critical Infrastructure

The policy should be cognisant of the impact of promoting increased visitor numbers and any potential associated new development. The policy should recognise the need for adequate and

appropriate wastewater, waste and drinking water services to be put in place to service any infrastructural development associated with tourism projects, in the interests of protecting both the environment and public health. In this context we would encourage clear communications between your department, Fáilte Ireland and key relevant stakeholders, including Irish Water and local authorities.

Circular Economy

A circular economy can have positive environmental, economic and social impacts, such as reduced plastic pollution, new employment opportunities and better quality, longer lasting, consumer products. The new policy should endorse a circular economy in tourism by supporting all tourist services in working towards circular patterns to reduce their environmental footprint. The policy should promote the use of best practices and guidelines relating to reducing residual (non-recycled) waste by 2030, reducing food waste, single-use plastics, air pollutants and water pollution while increasing water efficiency and sustainable transport.

Sustainable Tourism

The new Policy should promote the need for a sustainable tourism sector. It is important that tourism is promoted and developed at suitable locations, at appropriate scales and in an environmentally sustainable manner that minimises potential for significant adverse environmental impacts. The Policy should also support the need for appropriate monitoring and reporting to be carried out, to help ensure that the commitments and aims of the Policy are implemented correctly and in a transparent manner.

Opportunities to help raise awareness of the need for sustainable and responsible tourism, at a local and regional level, could be realised through the participation and contribution of citizens. The recent [Linte na Farraiqe](#) project is an example of how art and science have been linked to reveal the risks of rising seas and storm surges in the form of an artistic light installation in Dublin, Wexford and Galway.

Negative effects that may arise from excessive or inappropriate tourism can result in congestion (and associated local air quality and noise issues), pressures on critical service infrastructure, increased demands on energy and water resources, environmental degradation and damage to cultural heritage sites and monuments. The new Policy should promote implementation of measures that will mitigate against the negative impacts of excessive tourism and preserve our natural and cultural heritage.

Green Procurement Considerations

We recommend that your department considers including a recommendation in the new Policy, to promote sustainable and green project level procurement practices, for tourism related projects arising out of implementing the new Policy. This would help integrate sustainable and green procurement considerations and identify opportunities to progress national commitments regarding action on climate change and biodiversity and promoting a more circular economy. The EPA's [Green Public Procurement Guidance](#) (EPA, 2021) may be useful to consider in this regard.

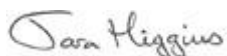
Additional Resources

We also bring to your attention the [EU Tourism Dashboard](#). It is an online knowledge tool developed by the European Commission, aimed at promoting and monitoring the green and digital transitions and the socio-economic resilience factors related to European tourism.

We also refer you to the development of a new EU Agenda for Tourism 2030 by the European Commission¹. This agenda will include a vision, ideas and potential projects on how the tourism ecosystem can contribute to achieving the European Green Deal objectives. Its focus is on promoting the sustainable recovery of the tourism sector in a post-Covid environment.

If you have any queries or need further information in relation to this submission, please contact Suzanne Wylde, Strategic Environmental Assessment Unit directly. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.

Yours sincerely,

A handwritten signature in black ink that reads 'Tara Higgins'.

Dr Tara Higgins

Programme Manager

Office of Evidence and Assessment

¹ <https://www.consilium.europa.eu/en/press/press-releases/2022/12/01/new-european-agenda-for-tourism/>