



Screening for Appropriate Assessment Determination

Title: **National Tourism Policy Framework 2025-2030**
Author: **Department of Tourism, Culture, Arts, Gaeltacht, Sport & Media**
Type: **High-level national policy framework**
Date: **29 October 2024**

Introduction

The EU Habitats Directive (92/43/EEC) placed an obligation on Member States of the EU to establish the Natura 2000 network. Natura 2000 is a European network of important ecological sites made up of Special Protection Areas, established under the EU Birds Directive (79/409/EEC), and Special Areas of Conservation, established under the Habitats Directive itself. Ireland's contribution to Natura 2000 is developed through the European Communities (Natural Habitats) Regulations, 1997 (S.I. 94 of 1997 as amended by S.I. 233 of 1998 and S.I. 378 of 2005). These regulations transpose the EU directives into Irish national law.

The purpose of an Appropriate Assessment is to establish whether a particular plan or project is likely to have a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects. Natura 2000 sites in Ireland are Special Protection Areas, and Special Areas of Conservation. The obligation to examine the need to undertake Appropriate Assessment derives from Article 6(3) and 6(4) of the Habitats Directive. Appropriate Assessment has been a legal requirement in Ireland since the adoption of the European Communities (Natural Habitats) Regulations, 1997.

Where it is obvious or highly likely that a significant impact or impacts will be incurred to any Natura 2000 site, an Appropriate Assessment is required. However, where this is not the case, a preliminary screening must first be carried out to determine whether a full Appropriate Assessment is required. In accordance with guidance available at national¹ and EU level², the Department of Tourism, Culture, Arts, Gaeltacht, Sport & Media (D/TCAGSM) carried out this screening of the *National Tourism Policy Framework 2025 – 2030*.

Appropriate Assessment Process

Regulation 42 of the Habitats Regulations requires undertaking Stage 1 Screening for Appropriate Assessment, and where necessary Stage 2 Appropriate Assessment, of any plan or project for which an application for consent is received. Stage 1 Screening for Appropriate Assessment considers the first two tests of Article 6(3) of the Habitats Directive, specifically:

- i. whether a plan or project is directly connected to or necessary for the management of the site, and
- ii. whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site in view of its conservation objectives.



If the effects are deemed to be significant, potentially significant, or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2. As prescribed, Stage 1 Screening for Appropriate Assessment process should include the following steps:

- i. A description of the plan or project and local site or plan area characteristics
- ii. Identification of relevant Natura 2000 sites, and compilation of information on their qualifying interests and conservation objectives
- iii. Assessment of likely effects – direct, indirect and cumulative – undertaken on the basis of available information as a desk study or field survey or primary research as necessary
- iv. Screening statement with conclusions.

i) Description of National Tourism Policy Framework 2025-2030

The tourism sector faced significant challenges in recent years, but it has nonetheless played a key part in Ireland's economic recovery. The *National Tourism Policy Framework 2025-2030*³ aims to provide the foundations to ensure this strong performance continues in the years ahead, and also that tourism is founded on sustainable principles and plays its part in achieving national climate targets. It presents government priorities for tourism up to 2030 and provides insight on the strategic vision for the sector for the tourism agencies (Fáilte Ireland & Tourism Ireland), public bodies, and industry stakeholders. It is a national plan covering all parts of Ireland.

The *National Tourism Policy Framework 2025-2030* articulates a vision for prospering nationwide tourism sector that embraces action on climate and environment issues to the long-term benefit of visitors and local communities. The policy is based around three strategic objectives:

1. Transition to a sustainable tourism model, rooted in authentic, verified climate and environmental actions.
2. Support and promote tourism to be a thriving economic sector offering innovative, world-class experiences.
3. Ensure tourism extends a welcome to all, provides rewarding careers, and strengthens communities and culture.

These objectives embrace seventeen focus areas representing the key issues that require attention in order to achieve progress towards the objectives. They are presented along with policy proposals which aim to support and facilitate action across the focus areas. The key targets expressed in the policy document are:

Environmental Pillar

- Tourism must play its part in achieving national climate and biodiversity targets. Due to the cross-cutting nature of the tourism sector, achieving emissions reductions and environmental protection measures will require action across many areas, such as transport and energy. To enable focused emissions reduction actions and monitoring of progress, Fáilte Ireland will establish a baseline figure for tourism associated



emissions. Subsequent shorter term Tourism Action Plans to give effect to the policy objectives outlined in this Framework will contain tourism specific emission reduction and biodiversity targets.

- Measures will be put in place to ensure that the average carbon emissions associated with each visitor bed night is reduced by 60% by 2030. In this regard the Tourism Action Plans developed on foot of this Policy Framework will include specific targets for the number of tourism businesses which will have undertaken environmental audits and emission reduction measures.

Economic Pillar

- Targeting growth in overseas visitor numbers alone can no longer be considered a sustainable objective. Accordingly, the focus will be on growing the revenue associated with these overseas visitors. While annual figures may fluctuate depending on economic and other factors, the overall aim will be to achieve an average annual 5.6% year- on- year growth in the revenue generated by overseas visitors in the period to 2030.
- Having more Irish people holidaying at home would deliver significant economic and environmental benefits. Future Action Plans will include specific targets around displacing outbound holidays with domestic ones. In terms of domestic tourism, the longer-term target will be to achieve an average annual increase of 5.6% in tourism revenue in the period to 2030.

Social Pillar

- A key consideration in all future policy decisions is to ensure that a sufficient number of people have year-round, quality jobs in the tourism sector and that these jobs are located throughout the country.
- To ensure that employment in this sector benefits all areas of the country, employment growth will be supported in the less-developed tourism regions.
- To ensure that employment in this sector includes both seasonal and year-round opportunities, the Department and its agencies will promote the extension of the tourism seasons to support the delivery of this objective.

ii) Identification of relevant Natura 2000 sites

The *National Tourism Policy Framework 2025-2030* is a national plan and as such, has the potential to affect all 607 Natura 2000 sites in Ireland - comprising 441 SACs⁴ and 166 SPAs⁵. It is not however, directly connected with, or necessary to the management of, any of these sites.

iii) Assessment of Likely Effects

The *National Tourism Policy Framework 2025-2030* is positioned within a strategic hierarchy which commences with the National Planning Framework and associated National Development Plan. Tourism is recognised within the National Planning Framework and this



policy has been prepared with regard to the objectives of the National Planning Framework, including rural development and environmental protection.

The probability that the *National Tourism Policy Framework 2025-2030* will result in significant environmental effects is low. The policy is a high level national plan which sets out a roadmap for the social, economic and environmental sustainability of the sector in the coming years. It does not set a framework for development nor does it propose the location, nature, size or operating conditions of tourist developments, visitor attractions or support infrastructure.

The *National Tourism Policy Framework 2025-2030* is a high-level articulation of government policy and establishes the aspirations and principles required to achieve sustainable and balanced development of tourism activity across the country. It is a strategic document and whilst it proposes policy measures to achieve the overall vision, it does not prescribe the specific nature or form of delivery, or specific geographical areas for project delivery.

The *National Tourism Policy Framework 2025-2030* will guide lower level actions and influence stakeholders, including the tourism agencies and Local Authorities in their work on the development of Irish tourism. Any plans or projects developed for the delivery of the policy measures, giving rise to, or potentially giving rise to, environmental impacts, will be subject to further consideration by the competent authority (or authorities) leading the development.

The following guidance from the European Commission is also relevant for this assessment:

Sectoral plans should also be considered as covered by the scope of Article 6(3), again in so far as they are likely to have a significant effect on a Natura 2000 site. Examples might include transport network plans, energy plans, waste management plans, water management plans or forest management plans (see C-441/17, 122–124).⁶ However, a distinction needs to be made with ‘plans’ which are in the nature of policy statements, i.e. policy documents which show the general political will or intention of a ministry or lower authority. An example might be a general plan for sustainable development across a Member State’s territory or region. It does not seem appropriate to treat these as ‘plans’ for the purpose of Article 6(3), particularly if any initiatives deriving from such policy statements must pass through the intermediary of a landuse or sectoral plan (C 179/06, paragraph 41)44. However, where the link between the content of such an initiative and likely significant effects on a Natura 2000 site is clear and direct, Article 6(3) should be applied.

iv) Screening Statement / Conclusion

Sustainable tourism development is predicated on responsible interactions in terms of people, prosperity and the planet. Through the *National Tourism Policy Framework 2025-2030*, the Government is articulating its vision for a sector that supports sustainable communities and businesses, while also respecting its statutory and other responsibilities towards the environment and climate. D/TCAGSM recognises the potential impact of tourism on the natural environment and hence has considered the need for Appropriate Assessment. In this context, the following points are noted:

- The *National Tourism Policy Framework 2025-2030* does not set a framework for development decisions; does not determine or set the management framework for



Natura 2000 sites; does not set the location or proposed location of individual projects; and does not set a programme for the undertaking, timing or phasing of development.

- European Commission guidance on Appropriate Assessment for sectoral plans states that it does not seem appropriate to treat these as ‘plans’ for the purpose of Article 6(3) where they are in the nature of policy statements which show the general political will. The *National Tourism Policy Framework 2025-2030* is such a policy document.
- The *National Tourism Policy Framework 2025-2030* is not directly connected with, or necessary to the management of, any of the 607 Natura 2000 sites in Ireland.
- Implementation of the objectives in the *National Tourism Policy Framework 2025-2030* will require the development of downstream plans and project proposals which will in themselves be subject to consideration regarding potential environmental impact.

In light of the foregoing points, D/TCAGSM is satisfied that the conditions set out in the first two tests of Article 6(3) of the Habitats Directive are not breached through the implementation of the *National Tourism Policy Framework 2025-2030*, and that Appropriate Assessment is not required.

Contact

Tourism Policy Unit,
Department of Tourism, Culture, Arts, Gaeltacht, Sport & Media,
Government Buildings,
New Road,
Killarney.
Email: tpu@tcagsm.gov.ie