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Policy failures, action and implementation gaps, and non-policy in tourism: a critical appraisal

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Introduction

Recent environmental, political, and economic crises have shed further light on the vulnerability of tourism across different regions and environments around the globe. From a public policy perspective, legislation, regulations, and direct interventions of national, regional, and local governments in tourism have long been used to address various social, economic, environmental, and technological issues impacting businesses and individuals (Amore, forthcoming; Hall & Jenkins, 1995). However, evidence shows that many of these interventions in both developed and developing countries reflect the proliferation of neoliberal and hyperneoliberal ideologies emphasizing economic growth and *laissez faire* policies that reinforce the role of 'the market' as a governance mechanism (Duffy, 2015; Torkington et al., 2020).

Public policy in tourism predominantly consists of reactive, *ex-post*, policy actions and deliberations that are, in part, a response to the inactions of governments in the first place (Dodds & Butler, 2008). The conjunctural nature of tourism policies can be particularly observed in the extemporaneous and short-term policy responses in the aftermath of natural hazards and crises, with redevelopment almost exclusively focusing on fast-track recovery of destinations (Hall et al., 2016). Even in contexts where tourism is a pivotal contributor to economic development, the fragmented nature of tourism governance steering modes often undermines the capacity of genuinely broad and inclusive collaborative policy actions and stakeholder decision-making (Hall, 1999; Farmaki et al., 2015). This can be observed on key policy aspects like environmental protection (Aall et al., 2015), heritage governance (Adie, 2019), migration (Amore, 2023), local destination governance (Zahra, 2011), and funding (Bohlin et al., 2016). For example, the recent concept note by the UNWTO (2023) put the accent on the opportunity to invest in green infrastructure in the tourism and hospitality sector. However, it remains unclear as to how infrastructural improvements of this kind and the related rebound effects effectively contribute to what already is an energy-intensive sector (Hall & Amore, 2016).

It has been widely acknowledged that legislation and regulations for tourism, at all scales, are “rarely exclusively devoted to tourism per se” (Hall, 2008, p. 14). This may be because there is no clear government authority for tourism able to design and implement a cohesive policy agenda like other quintessential branches of government (Hall, 2008). Additionally, there is no one-size-fits-all government structure for national, regional, and local tourism policy and planning given that tourism relevant policies operate across different government agencies and ministries, with most tourism specific government bodies tending to have a narrow promotional, research and development focus. This, in turn, can decrease the effectiveness of tourism policies and increase the chances of inter-agency policy differences over policy settings and blockages in the policy process (Hall & Jenkins, 1995; Simmons et al., 1974). Despite its economic significance, the political environment in which tourism policymaking takes place is also likely to not regard tourism as a key socio-economic policy area for national and regional development, unless there is a high degree of economic dependency on tourism, as in some small island developing states. A review of national and regional governance frameworks for tourism in OECD countries, shows how the tourism policy arena is often subsidiary to other main government portfolios or relegated to second-tier directorates and government branches with mainly marketing and policy advisory roles (OECD, 2022).

The COVID-19 global pandemic and the impacts on tourism following the lockdowns represented a potential turning point in the study of tourism policy and planning. As Higgins-Desbiolles (2021) observes, academic debate in the field saw a polarization between those advocating for a much-needed reform towards more responsible

and sustainable trajectories in tourism (e.g., Brouder, 2020) and more precautionary approaches (Hall et al., 2020). Hall and Seyfi (2021) discussed the impact of COVID-19 on tourism and the potentialities of degrowth and slowing down practices in acknowledgement of the environmental and social pressures destinations have been coping with prior to the pandemic. However, the authors noted that “many of the government responses to COVID-19 are not geared towards green responses but are instead meant to reinforce business as usual or worse” (Hall & Seyfi, 2021, p. 225). The latter echoes Amore and Adie (2021) findings across urban destinations and the prevailing rhetoric of swift recovery following the pandemic.

The following chapter provides a critical appraisal of policy issues and policy interventions with direct impacts in tourism as well as policy problems caused by unregulated and market-driven tourism policies. It does so by presenting a framework illustrating policy failures, and policy-action relationships/policy implementation gaps and non-policies building from evidence collected from destinations and contexts in developed and developing countries. The chapter then provides an overview and a rethinking of policy action in tourism in opposition to the prevailing mode of governance and public policy making.

Theory

Research focusing on tourism and public policy builds on a well-established body of studies rooted in political theory, policy analysis, political geography, and development studies. Geographical reach and scale of analysis is distributed across different types of tourist destinations (for a recent review, see Amore, forthcoming). Overall, policy studies shed light on the reach, efficacy, and fallacies of policy actions and inactions when it comes to the role of governments in the governance of tourism. At the national level, lobbying from tourism industry stakeholders has often defined the action of governments over the last decades. This was the case, for example, of Australia, with the federal government establishing a steering committee aimed at bolstering the national tourism economy so long advocated by business stakeholders (Dredge & Jenkins, 2012). In many countries, and especially those within the Westminster tradition, such as Australia, Canada and New Zealand, national tourism bodies are typically overseen by board that are filled with industry members and there being particularly close policy development relationships between agencies and tourism industry associations.

Studies conducted at the regional scale suggest that economic development, diversification, and competitiveness are main reasons for policy action and implementation of regional tourism strategies (Hall,

2008; Malecki, 2004). In South Africa, for instance, the mandate by the national government to regional authorities was to ensure “the greater ‘geographic spread’ of tourism with emphasis given to supporting tourism growth in rural areas” (Rogerson, 2015, p. 283). Such measures being reinforced by the promotional activities of regional tourism organisations as well as competition to host events and attract infrastructure developments. Interestingly, the decision to encourage regional tourism development is often taken in response to economic restructuring, arising from technological and economic change, and perceived crises. More rarely are regional tourism policy initiatives “a proactive decision as the result of an awareness of changes in the tourism business environment” (Hall, 2008, p. 104).

Government and governance for tourism and the local level tends to be characterized by forms of coalescence between local authorities and private stakeholders on destination strategy and infrastructural development for tourism (e.g., Bramwell & Meyer, 2007). The action of policymakers is often coupled with mechanisms and forms of inaction and non-decision making to keep opposing stakeholders at arm’s length or to ensure that the ‘rules of the game’ favour particular policy interpretations (Hall, 2010a). This occurs, for instance, in relation to tourism and hospitality infrastructure development in the aftermath of natural hazards (Amore et al., 2017) or in cases where those in favour of the developments reach an agreement behind closed doors and exclude other actors from the policy process or limit their capacity to influence policy settings. The latter scenario occurs on tourism policy issues that put revenue and economic return ahead of natural and environmental protection (Hall & Amore, 2020; Higgins-Desbiolles, 2011).

It is widely acknowledged that the dogmas of neoliberalism influence the actions and decisions of governments in tourism. Overt and covert forms of power further define policies that legitimize pro-growth economic agendas (Bramwell, 2011). Duffy (2015) shows how nature-based tourism policies in Thailand and Madagascar promote a neoliberal-driven rhetoric at the expenses of wildlife protection and environmental conservation. Neoliberalism also permeates national tourism policy documents and strategies in Europe. A recent review by Torkington et al. (2020) shows how sustainability discourses in tourism are framed under neoliberalism and growth dogmas, while Hall (2019) suggests that notion of sustainable development as reported in the Brundtland Report has been used by policy-makers to promote and support green growth discourses in tourism that focus on efficiency rather than the absolute impacts of tourism. According to Amore and Hall (2017), crises and neoliberal-driven development discourses in tourism culminate in an hyperneoliberal spiral that “dominates the socio-technical system and frames the policy agenda that affect directly and indirectly impact tourism destinations and DMOs and sets destinations on particular development trajectories” (ibid. , p. 12).

Studies from developing and developed countries show different actions and roles of government authorities at different scales. For example, findings from Namibia indicate that the national government plays an important role in supporting local communities to benefit from tourism activities (Kavita & Saarinen, 2016). Similarly, the federal regionalization tourism program implemented in Brazil has contributed to fostering economic growth, particularly in urban areas (Silva et al., 2023). Local authorities can often have an important co-ordinating role in the promotion and development of tourism, which is the case of Tuscany, Italy (Gori et al., 2021). Research has also provided evidence on the role of governments in the promulgation of laws for land zoning and investment opportunity areas for tourism (Dela Santa, 2018; Gotham, 2012) and of legislation or municipal action to regulate tourism activities at the local scale. This has especially been the case when seeking to manage the impacts of Airbnb and Uber (Amore et al., 2022; Hall et al., 2022), as well as the setting of service standards in the hospitality sector (e.g., Canary Island, Spain) (Simancas Cruz et al., 2018). Yet, when it comes to environmental sustainability and tourism policies, the co-ordinating role of the state at different scales can be far from being effective (Brendehaug et al., 2017) or limited to the will of powerful industry stakeholders (Farmaki et al., 2015). Direct taxation from tourism activities to favour de-carbonization has been suggested as a possible solution to reduce the environmental externalities of the sector (Scott et al., 2016), even though examples from highly congested destinations suggests that its effectiveness to address environmental issues is questionable (Nepal & Nepal, 2021).

The role of government and public authorities in tourism has also come under scrutiny because of the escalating climate crisis and the COVID19 pandemic (Gössling et al., 2021; Kennell, 2020). The implementation of government funded business aid and recovery schemes (e.g., furlough, monetary incentives) and the regulation of lockdowns to restrict national and international travel are testaments of the interventionist role and prominence of the state on markets, mobility, resources, and societies, despite them seemingly being at odds with the market-driven policies that were implemented over the last decades (Kennell, 2020; Seyfi et al., 2023). However, Gössling et al. (2021, p. 3) warned of the “urge by many to go back to business as usual, perhaps to overcompensate for losses by even more aggressive growth” as the global COVID-19 pandemic crisis de-escalated. Amore and Adie (2021) acknowledged the ‘new normal’ to dangerously lead to an exacerbation of the same old social and economic disparities in destinations, particularly in urban areas. Although there were pleas for alternative policies towards a just pathway for tourism in respect of communities and ecological limits (Higgins-Desbiolles, 2020, 2021), there was “no evidence-based strategy for climate change mitigation, and an overall silence regarding pandemic and other risks the global tourism system imposes on itself and the global economy” (Gössling et al., 2021, p. 13). The academic arguments over the ideal balance between economic

development and sustainability (Higgins-Desbiolles, 2020) did not effectively enter public policy arenas and mirror the lack of progress in addressing the climate crisis in tourism policymaking.

Data collection

For the purposes of this study, we collected policy documents and tourism strategies enacted by national governments following the COVID-19 outbreak and global health crisis in March 2020. The focus on documents and strategies by national authorities is not new to tourism policy analysis and research (Dredge & Jenkins, 2012; Torkington et al., 2020). Tourism strategies as a policy output can be regarded as episodes of governance (Healey, 2003, 2006) that are available to the scrutiny and critical appraisal of scholars devoid of covert forms of power and influence between the researcher and the researched. As Hall (2010b, p. 40) argues, “policy is more than just a written document, although that may represent an important output of a decision- and policy-making process”.

The analysis focused on national tourism strategies issued by branches of governments responsible for tourism development in El Salvador, Italy, the Maldives, South Africa, and the United States (USA) (Table 1). The selection was based on geographical representation, travel, and tourism policies conditions (WEF, 2022) and share of the travel and tourism industry to the economy in 2019 (WTTC, 2023). Additionally, we ensured a homogenous representation of destinations contexts with diverse travel restrictions policies implemented during the COVID-19 pandemic (Mathieu et al., 2020). A further criterion for the selection was the tourism strategy implementation period, with a start date during or after the COVID-19 pandemic breakthrough. Tourism strategy extracts were coded with the support of NVivo and grouped under pre-established categories adapted from Hall (2008).

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Findings

Tourism as a Policy Issue

The coordinating role of national governments is acknowledged as a factor in the implementation of the tourism strategy. This can be found in the tourism strategy for El Salvador, which mentions the coordinating role of the

Tourism Cabinet (*Gabinete Turistico*) in supporting the Ministry of Tourism to implement the strategy. This is further emphasised in one of the pillars of the strategy (*Institucionalidad del Sector*) which seeks to strengthen the action of the government in terms of political and regulatory frameworks (Gobierno de El Salvador, 2020). The tourism strategy for Italy also recognizes the importance of the public sector as a coordinator and its role to ensure greater cohesiveness and reduce governance clashes between national and regional authorities. In contrast, the New Zealand strategy places much more emphasis on public-private partnership led by the New Zealand Tourism Industry Association. The territorial governance for tourism in Italy is, in theory, under juridical and legislative responsibility of the regions, but the national government has put in place a joint regional body (*Conferenza dei Presidenti delle Regioni e delle Province Autonome di Trento e di Bolzano*) to work in concert with the Minister of Tourism and the associations of provincial and municipal authorities. The latter are directly involved to work in coordination with the Minister to address local level issues like transport logistics and the hosting of MICE events and hallmark cultural events (Parlamento Italiano, 2023). A similar coordinating role can be found in the strategies for the Maldives and the United States, with an emphasis on the role of government ministries to “collaborate across and within the public sector to prioritise the tourism industry” (Republic of Maldives, 2023, p. 72) and to “promote sustainable tourism in coordination with regional, state, local, and tribal tourism and outdoor recreation offices” (Government of the United States of America, 2022, p. 22), while the New Zealand government has a more limited coordinating role overall. However, in New Zealand, as in other jurisdictions, ‘incentives’ for coordination between central government, regional tourist organisations and industry is encouraged through funding programmes for promotion and development.

When looking at the definition of *stakeholders*, it comes as no surprise that the strategies tend to refer almost exclusively to industry partners. For instance, the tourism plan for El Salvador mentions the private sector as the main stakeholder for government entities to collaborate with towards the development of tourism in the country (Gobierno de El Salvador, 2020). In the case of the Maldives, the 2023-2027 Tourism Master Plan was developed in consultation with industry stakeholders and partners (Republic of Maldives, 2023). The 2021-2025 strategic plan for tourism in South Africa stresses on the pursuit of a corporatist governance approach encompassing strategic partnerships and collaborations with industry stakeholders (Republic of South Africa, 2020). The two notable exceptions come from the US tourist strategy, which explicitly mentions community stakeholders be consulted “to plan for the most desired improvements, identify cross-management or sustainability needs, and advocate for funding that supports capacity-building efforts” (Government of the United States of America, 2022, p. 21). The strategy also acknowledges the importance of involving tribal communities as way to implement the vision of the strategy in respect of the *Native American Tourism and*

Improving Visitor Experience Act (Government of the United States of America, 2022). Similarly, New Zealand specifically acknowledges the role of Māori and Māori tourism organisations as stakeholders.

The actions of state authorities in tourism across the observed countries shows a convergence in planning practice. In particular, there is a narrative that conveys destination plans as business strategies and provides a range of targets and goals to be achieved within a period between four (e.g., Italy) and ten years (El Salvador). The tendency in the analysed documents is to identify a range of main goals and targets, with a preliminary identification of what performance criteria to monitor and the relevant public sector stakeholder responsible for the monitoring and reporting. The tendency, however, is to define tourism development specific goals and targets without a proper acknowledgement of wider macroeconomic policy agendas and issues. The only document that explicitly acknowledges the importance of framing tourism within the wider development of the country can be found in the Italian destination strategy, which recognizes how the 2023-2027 tourism plan should be adapted and implemented in line with the joint EU-Italy *Piano Nazionale di Ripresa e Resilienza (PNRR)*. The latter also highlighting the potential role of transnational organisations or institutional arrangements, such as the European Union, in influencing national, regional and local tourism policies.

The impact of the COVID-19 pandemic in the tourism sector and the need for some form of direct interventions of state authorities in legislation, regulation and taxation is addressed across the plans and strategies. In the case of Italy, a dedicated scheme is enacted to ensure tourism businesses can restructure their debts and thus avoid bursting following the years of high uncertainty and forced temporary business closure following the pandemic (Parlamento Italiano, 2023). Additional measures encompass the reform of the regional tour guides system, the standardisation of the existing hotel classifications and certifications and incentives to hire new employees in the sector. In the Maldives, the strategy plan foresees the allocation of a green tax revenue for businesses seeking to invest in green infrastructure as well as mechanisms to increase access to finance to SMEs and reduce red tape for registering a new property (Republic of Maldives, 2023). The national tourism strategy for the United States, instead, is the only one explicitly mentioning “climate change resilience and adaptation strategies into infrastructure investment and management and visitor use management on federal lands and waters” (Government of the United States of America, 2022, p. 32). Yet, the legislative extent of federal and state sphere of action and the regulatory guidelines that are required to effectively implement strategies are not addressed, with similar issues of implementation also occurring in the New Zealand context.

Almost all the strategies retrieved for this study recognize the importance of investing on infrastructure as one of the key priorities. Both the Italian and the South African tourism strategies refer to MICE tourism as target for

infrastructural and direct government support in bidding and hosting applications (Parlamento Italiano, 2023; Republic of South Africa, 2020). The Italian and the Maldivian strategies also acknowledge the necessity for enhance transport infrastructure investments for maritime (Parlamento Italiano, 2023) and airport transport (Republic of Maldives, 2023) respectively. Focusing on financial incentives, the tourism strategy for Italy defers to the National Recovery and Resilience Plan (*Piano Nazionale di Ripresa e Resilienza – PNRR*) dedicated funding scheme for new projects aimed at enhancing digitalization, innovation, and environmental sustainability practices in tourism services (Parlamento Italiano, 2023). The strategy for the Maldives, instead, is for the establishment of a dedicated fund to assist climate adaptation measures in the sector (Republic of Maldives, 2023). Conversely, the tourism strategy for South Africa identified the Tourism Incentive Programme as the already existing funding scheme to assist tourism activities (Republic of South Africa, 2020). In a similar fashion, the tourism strategy for the United States refers to existing federal funding schemes to be communicated and made available to small-scale tourism providers (Government of the United States of America, 2022). The New Zealand strategy also noted the importance of infrastructure, but a subsequent change of government since the strategy was developed also highlights the difficulties of effective strategy planning for tourism.

The rhetoric of tourism as a key contributor towards economic development permeates the strategies of the observed destinations. The strategies for New Zealand, South Africa and El Salvador stressed the positive outcomes in terms of employment, visitor spending, increased tax revenues, and foreign trade and currency (Gobierno de El Salvador, 2020). Similarly, the strategy for the Maldives considers tourism as key for the prosperity of the country and identifies priority goals and objectives to strengthen the competitiveness of the destination on the global stage (Republic of Maldives, 2023). The tourism strategy for Italy reiterates the competitiveness dogma and how reforms in tourism should promote green development and circular economy solutions for tourism to be competitive (Parlamento Italiano, 2023). Conversely, socio-environmental development goals through tourism are only explicitly acknowledged in the strategies for El Salvador and the United States. On the one hand, the Government of El Salvador acknowledges the necessity to find a balance between economic development and the conservation of natural and cultural resources (Gobierno de El Salvador, 2020). On the other hand, the Government of the United States advocates for the implementation of travel and tourism projects featuring “environmental justice, inclusion, and resilience principles” (Government of the United States of America, 2022, p. 23).

Overall, the tourism strategies featured in this analysis permeate a positivistic appraisal of tourism-driven development and the grow-ism rhetoric that much characterized tourism policies prior to the COVID-19 outbreak and global pandemic. The latter is only acknowledged in terms of decreased tourism volume (e.g., Maldives,

United States). Most strikingly, ecological vulnerabilities and socio-economic challenges attributed to tourism prior to the pandemic are overlooked. This is somehow bizarre if we consider that Italy is home to the number one overtourism city (Amore et al., 2020), the United States have been significantly exposed to natural hazards (e.g., hurricanes) (Adie, 2024) and the Maldives have long been coping with sea-level rising and coral bleaching as consequence of climate change (Scheyvens, 2011). The question, therefore, is whether we are in a situation of a missed opportunity and a reiteration of a policy as usual scenario.

Directions

Given the hollowing out of the state and the subsequent focus on governance and coordination the question rightly applies as to how interventions can encourage destinations to take different trajectories as opposed to boosterism, economic-driven and fast-track recovery approaches. These issues have become even more important given the interest in the process of sustainable transitions and the advocacy towards a much-needed transformative shift in current socio-ecological regimes. These processes are inherently political because as Hölscher et al. (2018, p. 2) notes, “actors play key roles in shaping desirable transitions and transformations through transformative agency and governance. Processes to shape transitions and transformations are deeply political, involving power struggles and value conflicts”. Furthermore, it is important to recognise that despite arguments for the transformative nature of external crisis events, such as COVID-19, from a policy process perspective, the ‘outcome’ of post-crisis pathways may not be transformative at all, in the sense of being more sustainable, but instead revert to system maintenance (Business as Usual approaches). Thus, in times of crisis and emergency, destinations may revert to old ways of ‘doing’ and sometimes doing it in a stronger fashion. This is especially significant in the aftermath of large-scale disasters whereby state encouragement for capital investment has only been heightened by the opportunities provided by disasters (Hall et al., 2016) and the continued commitment of governments to place competition strategies (Malecki, 2004). Nevertheless, an interesting future avenue in policy studies is seeking to understand the way in which policy interventions are linked to pathway experimentation and, perhaps of increased concern given environmental crises, pathway lock in, i.e. how policy decisions at one point in time, such as infrastructure investment, set development directions for subsequent years which can only be broken out of at great cost (Rifkin, 2019).

Discussion and Conclusions

The nexus between hyperneoliberalism, governance, and tourism policy sets the context for contemporary policy interventions. Such relationships are not always negative and have been highlighted in relation to the pursuit of sound good governance principles of equality, justice, and democracy among marginalized Mayan communities in Quintana Roo, Mexico (Jamal & Camargo, 2014). However, at the same time, it is crucial to prioritize ecological protection, rectify the inequalities caused by neoliberal-infused tourism policy and put “tourism in the service to the public and to be accountable to the public” (Higgins-Desbiolles, 2020: 618). As Jamal and Camargo (2014: 26) put it:

We lack theoretical and practical tools to tackle important ethical and justice-related issues related to destination development and marketing, particularly intangible aspects such as human–environmental (ecocultural) relationships, cultural commodification, and inequitable distribution of tourism opportunities (and costs) among disadvantaged groups We call for an ecocultural, participatory, and integrated framework of justice and care to guide sustainable tourism.

The readers of this chapter might wonder: how such third-order change can be achieved when policy actors are unwilling to acknowledge policy failure or recognise potential policy alternatives? Undeniably, this is a hefty task for tourism scholars to accomplish. Applied research in public policy occurs within a depoliticized environment of consensus, rationalization, and power (Cryle & Hillier, 2005; Flyvbjerg, 1999) in which policy options and pathways are presented as the result of ‘rational’ policy processes, and tourism is no exception. Nonetheless, it is the task of scholars to critically conduct policy analysis and question the legitimacy and rationale of policy actions against a range of normative standards with respect to the environment, stakeholder recognition and participation, and ethics. The way forms of citizenry engagement and inclusive participation in tourism policy and governance are evolving (Erdmenger, 2022) also reflect obsolete modes of destination governance. At the same time, research should recognise the power-less and those seeking to have their voices heard, in the pursuit of genuinely democratic, equal, and diverse governance arenas to improve policy outcomes and impacts.

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