Reviewing Policy towards the Integration of Sustainable Tourism and Conservation Management

Executive Summary

Gabriel Cooney and Joanne Gaffrey

UCD School of Archaeology









Thank you to the GeoparkLIFE funding partners





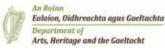












GEOPARKLIFE: TOURISM FOR CONSERVATION

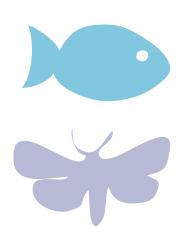
Contents

1. The purpose of the Review	3
2. Format	4
3. Part 1: Mapping policy	6
4. Part 2: Perspectives of the project partners and other stakeholders on policy	8
5. Part 3: Assessing policy and moving to a more coherent framework	11
6. Recommendations	14

REVIEWING POLICY TOWARDS THE INTEGRATION OF SUSTAINABLE TOURISM AND CONSERVATION MANAGEMENT

1. The purpose of the Review

- 1.1 The aim of the Burren and Cliffs of Moher GeoparkLIFE programme was to strengthen the integration of tourism and conservation, reconciling the development of tourism with management of natural and cultural heritage. The challenge of integrating tourism with conservation is a European challenge. It is a stated priority of the European Union to promote the development of sustainable, responsible and high-quality tourism. While European policy emphasises sustainability in tourism this has to be integrated with several European legislative and policy instruments, both in the environment (such as Natura 2000, the Water Framework Directive and other directives) and in development (such as the Structural and Cohesion funds).
- 1.2 The GeoparkLIFE programme builds on the important conservation work carried out to date in the region through projects such as Burren Farming For Conservation Programme (BFCP), developed through BurrenLIFE (an EU LIFE biodiversity project) and the sustainable tourism model developed through the Burren Connect partnership.
- 1.3 A key issue in achieving the aim of integrating tourism and conservation management is to focus on the policy context of the programme. It is important to address the challenge of recognizing and reconciling any potential conflicts between tourism and other policies, especially regulatory environmental and conservation policies in ensuring sustainability.
- 1.4 It is clear through the work of the GeoparkLIFE programme that the problem is not necessarily a lack of policy, but the need to recognize that there is a wide and diverse range of legal and policy instruments which may not always be in direct alignment. This also indicates that it is likely to be when international and national policies are actually implemented on the ground at local level that difficulties and friction may occur. This has an impact on the integration of tourism and conservation management to ensure a sustainable future both for tourism and the Burren landscape.



2. Format

- 2.1 The review process was composed of three sections; mapping policy, the perspectives of partners on the ground with regard to the current policy framework and finally the assessment of the main policy gaps and how a more coherent framework can be developed.
- 2.2 **Part 1**: the mapping policy report, aims to provide an overview of the legislation and policies which drive relevant strands of activity within the area of the Burren and Cliffs of Moher UNESCO Global Geopark (and more broadly in Ireland) and how this impacts on the natural and built heritage, conservation management, the environment and tourism sectors generally.
- 2.3 The implementation of policy depends on institutions, the knowledge of people and decision-making on the ground. In this context policy can be seen as an active, ongoing and organic process, rather than simply the result of the carrying out of rational decisions. Central to the GeoparkLIFE programme was the adoption of a partnership model and approach, under the under the auspices of the Geopark management (Clare County Council), and including all the relevant state agencies, local organisations involved in tourism and heritage conservation, community groups and individuals. To gain a perspective on how policy works on the ground all the key policy actors were interviewed using a standardized structure. **Part 2** of the report consists of the analysis of these interviews. The interviews provided a range of valuable insights and perspectives on the implementation of explicit, and also less well-defined or implicit, policies in the Burren and Cliffs of Moher UNESCO Global Geopark

2.4

The approach in the final section of the review, **Part 3** was to build on the perspectives of project partners and other stakeholders as discussed in Part 2, to focus on policy needs and then to consider approaches to moving to a more coherent policy framework. The Clare County Development Plan 2017-2023 was seen as providing a key policy context and framework.

- 2.5 Key policy needs were demonstrated using case studies from the GeoparkLIFE programme. Comparison with the management approach in areas that share similarities with the Burren and Cliffs of Moher UNESCO Global Geopark were used to indicate the parameters of a best practice approach to implementing an effective policy framework.
- 2.6 On the basis of this analysis a number of policy choices were discussed and key recommendations made in relation to key policy gaps and an effective policy framework specifically for the Burren and more broadly at European level.



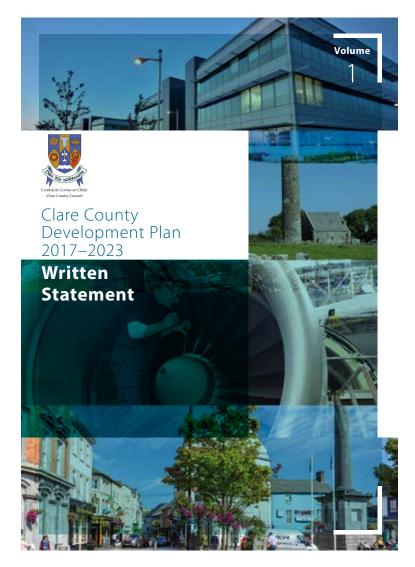
3. Part 1: Mapping policy

- 3.1 This provides an overview of the range of legislation and policies that are relevant to conservation management and sustainable tourism within the area of the Burren and Cliffs of Moher UNESCO Global Geopark. Legal instruments and policies are considered at four levels: international, with particular emphasis on the European Union and Council of Europe, national, regional and local levels. For example in relation to natural and cultural heritage there are at least 40 distinct and relevant legislative instruments at these various levels.
- 3.2 By contrast with the conservation of natural and cultural heritage where there is a strong legislative basis for policy, tourism is primarily driven by policy instruments. The European Commission refers to sustainability as one of the key pillars of tourism development, however there is no agreed definition, or legislative basis, for what sustainable tourism actually means. At national level the most important policy instrument is *People, Place and Tourism, Growing Tourism to 2025* (2015). This explicitly states that the focus of policy is to maximize the export contribution of tourism while protecting the natural, built and cultural heritage. The policy document explicitly recognizes that this involves a change of focus from overseas visitor numbers to overseas visitor revenue.
- 3.3 Given that the Burren and Cliffs of Moher is designated as a UNESCO Global Geopark, in assessing the relevance of the wide range of legislation and policy on conservation management and its relationship to sustainable development, it is appropriate to begin with the *Operational Guidelines for UNESCO Global Geoparks*. The most important policy instruments and drivers on the ground at international level are those dealing with conservation of natural heritage and biodiversity such as the EU Directives on Habitats, Strategic Environment Assessment (SEA), and Appropriate Assessment (AA).
- 3.4 The Wildlife Act is a relevant and related national legislative instrument. However, the strength of the system for the protection of natural heritage and biodiversity is that it is



underpinned by EU Directives. By contrast it is at national level that cultural heritage is most strongly protected in EU countries. In Ireland the National Monuments Act and its amendments provide the main legislative instrument.

3.5 At national level the Planning and Development Acts are critical in providing the framework for forward planning and development control. International and national designations under relevant legislation can be material considerations in planning decisions. The County Development Plan is recognised as the critical policy instrument which brings together and integrates international and national policies for the strategic management and sustainable development of a county, in this case County Clare.



4. Part 2: Perspectives of the project partners and other stakeholders on policy

- 4.1 While this legislative context may appear complex, at first glance it might also appear to be unambiguous. However, it is important to recognize that approaches on the ground to the implementation of polices can differ depending on the context of the partner or stakeholder – or actors as they are referred to in the literature. The character of the GeoparkLIFE partnership model, run under the auspices of Clare County Council, with the active engagement of various state agencies, means that the majority of the partners can be described as 'state' actors, but there is also active involvement of business (market actors) people, particularly through BEN (Burren Ecotourism Network) but also through farming and related enterprises, while community (citizen) actors are also strongly represented. It should also be recognized that individuals can participate under more than one of these headings.
- 4.2 The structured interviews conducted with all the relevant state agencies, local organisations involved in tourism and heritage conservation, community groups and individuals provided key insights into the complexity and ambiguities that can arise from the actual implementation of policy on the ground.
- 4.2 Through the GeoparkLIFE programme partnership structure there is an increasing awareness of the range of relevant legislation and policy. However, detailed understanding of the wider impact of specific policies tends to be restricted to the body or agency with particular responsibility for them. The organizational structure of relevant Government departments is perceived as being fragmented or 'siloed', which makes it difficult to establish an effective framework of communication and dialogue. This tends to impose constraints rather than actual conflict as individuals or agencies do not appear to regularly cross-check with policies in other areas and to work within the confines of their own unit and direct policy concern. There is clearly a key issue here around communication and implementation.

- 4.3 A key issue that emerged across the board was the lack of resources and the perceived imbalance between national investment in tourism vis a vis investment in heritage and conservation management. This has led to a situation where tourism policy is seen as proactive and conservation management as reactive. This is to some extent being addressed by Fáilte Ireland through working in strategic partnerships with agencies such as the Office of Public Works in the management and presentation of sites. In working with tourism and conservation, it should be noted that there is a fundamental difference between market actors and citizen actors. Market actors do not actively see it as their role or responsibility to make themselves aware of policy. They comply with legislation through how they conduct their businesses and are concerned only with those policies that affect their businesses. Hence the importance of the development of the Geopark Code of Practice for Sustainable Tourism by Geopark LIFE partnering with the Burren Ecotourism Network (BEN). This translates the key principles of sustainable tourism into clear action statements that facilitates implementation and greater engagement and understanding amongst tourism enterprises.
- 4.4 Community and citizen actors appreciate the Burren as a unique area, their place and home, which requires a specific management approach that recognizes the particular character of the Burren landscape and lifestyle, as is successfully demonstrated by the Burren Farming for Conservation Programme (BFCP). The citizen actors probably have the greatest challenge when it comes to awareness and understanding of policy. It is really through active engagement in community projects that they get an insight into the complex myriad of policies that surround conservation, tourism and development. But unfortunately, as is illustrated by the experience of some of the community actors, it is often only after initial failure and frustration and with patience that capacity and knowledge are built. There is a strong perception, based on experience on the ground, that there is a lack of joined-up thinking by various state agencies, and a lack of guidance and advice for communities on the implications of conservation management policies.



4.5 The partnership model underpinning the Burren and Cliffs of Moher GeoparkLIFE steering committee and its collaborative approach to the management of the Geopark as a sustainable tourism destination is seen by all the actors as providing a good working model, although there was less confidence in the sustainability of this approach after the end of the GeoparkLIFE programme.





5. Part 3: Assessing policy and moving to a more coherent framework

- 5.1 In assessing the range of legislation and policies that are relevant to conservation management and sustainable tourism within the area of the Burren and Cliffs of Moher UNESCO Global Geopark it became clear that there are two critical policy instruments that have the potential to underpin a more integrated approach. These are the *Clare County Development Plan 2017-2023* and the *Operational Guidelines for UNESCO Global Geoparks*.
- 5.2 To illustrate how the partnership model underpinning the GeoparkLIFE programme has identified and is addressing policy gaps, three case studies were discussed to illustrate relevant policy issues and the broad scope of the programme. It should be emphasized that these case studies were chosen as illustrative. The work of the GeoparkLIFE programme in looking at the role of the tourism enterprises in sustainable tourism, the management of demonstration heritage sites and communitybased case studies promoting the sustainable integration of tourism and conservation management offered a wide range of work packages and implementation of policy on the ground to choose from.
- 5.3 A critical issue for tourist enterprises is transport policy and the role of day trip coach tourism. The key problem is that the Burren has a finite capacity for tourism and the current level of coach visitors, with the Cliffs of Moher as the primary attraction, is increasing and becoming unsustainable. A donothing approach is no longer justified. This is an issue that needs to be urgently addressed as the current implementation (or more correctly perhaps non-implementation of stated national tourism policy) of policy runs directly counter to the objective of the Geopark to attract visitors that will stay longer and spend more.
- 5.4 St Mac Duagh's Hermitage, Slieve Carran is one of the seven demonstration sites where transferable approaches for the management of sites are being developed through the GeoparkLIFE programme. It is clear that a programme of conservation is required on this site, which in turn highlighted

issues about the ownership of the site. This raised wider issues about the ownership, protection and management of archaeological sites within the area of the Burren National Park. A broader issue that this case study illustrates is a difference between an awareness of policy outside the direct remit of specific participants and a detailed understanding of its implications on their work. This applies to both natural and cultural heritage policy and legislation. Importantly the National Parks and Wildlife Service (NPWS) with responsibility for the National Park and the National Monuments Service (NMS) with responsibility for monuments are units in the same government department; the Department of Culture, Heritage and the Gaeltacht. Another complication that arises from a lack of legislative knowledge is the possibility that this can lead to noncompliance, particularly when it comes to the general public.

- 5.5 Internationally there is a growing focus on and recognition of active community involvement as providing the sustainable basis for heritage conservation. This is an underpinning principle of the management of UNESCO Global Geoparks. An Cabhail Mhór, a historic building in Killinaboy, is one of the case studies in the conservation management action of the programme. With the active support of the GeoparkLIFE programme the building has been extensively documented and training in skills provided but for a number of reasons. not least health and safety regulations, no actual work has been carried out. This case study illustrates the difficulties and frustrations a local community group (the Killinaboy History and Heritage Group) have faced in wishing to carry out an active conservation intervention on a standing structure. More broadly it demonstrates the challenges that are posed as we move towards a more community-focused and -led approach to conservation.
- 5.5 Alongside the policy gaps identified in the case studies and broader discussion in Part 2 of the review, it is clear that there is a recognition of the value of the partnership model underpinning the GeoparkLIFE programme. This illustrates that if there is the scope to engage at local level then difficulties can often be resolved to the satisfaction of parties involved. A common goal and the desire for a common good mean that, while frictions occur, everyone makes the effort to make it

work. The letter of the law and the spirit of the law can be reconciled with a pragmatic approach. Against this background it is clear that a key policy requirement is to identify a best practice model for the future management of the Burren and Cliffs of Moher UNESCO Global Geopark after the completion of the GeoparkLIFE programme.

5.6 One widely used policy approach to identifying best practice models is to carry out a comparative analysis. In this case four European sites were identified where integrated management processes and practice have been established. The four sites demonstrate an active and integrated management approach, combining natural and cultural heritage, active programmes of conservation, education and the promotion of sustainable tourism. They explicitly demonstrate consistency with the requirements of either the *Operational Guidelines for the Implementation of the World Heritage Convention* or the *Operational Guidelines for UNESCO Global Geoparks*.





6. **Recommendations**

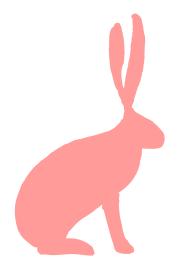
- 6.1 With the completion of the GeoparkLIFE programme at the end of 2017 the question arises as to how the Geopark will continue to deliver and sustain the aims and objectives of the programme and address the issues raised in the review?
- 6.2 The review makes recommendations specifically relevant to the Burren and Cliffs of Moher Geopark and the development and implementation of the GeoparkLIFE programme in relation to key policy gaps identified in the process. The review addresses the need for the implementation of an effective policy framework. It also addresses the challenge of integrating tourism with conservation at a wider European level.

6.3 Addressing Policy Gaps

 It is clear that as a high heritage value heritage destination based on sustainable tourism a key objective of the Geopark is to attract visitors who will stay longer and spend more. However on the ground the reality is that tourism policy is still apparently focused on growing the number of visitors. As been pointed out above this approach is not sustainable and prioritizes short-term (and limited) economic return over environmental impact and the need for conservation management.

It is **recommended** that the change of tourism policy articulated in the national policy instrument; *People, Place and Tourism*, *Growing Tourism to 2025* (2015), focusing on overseas visitor revenue and sustainability rather than visitor numbers should underpin the approach of all national, regional and local agencies to sustainable tourism in the Burren and Cliffs of Moher UNESCO Global Geopark. This should be implemented through a strategic regional plan for tourism which is a stated objective (CDP9.1) of the County Development Plan.

2. The most obvious policy disconnect between what is explicitly stated as the national approach to sustainable tourism and what is happening on the ground in the Burren



and Cliffs of Moher UNESCO Global Geopark is in relation to transport policy. As stated above the Burren has a finite capacity for tourism and the current level of day trip coach visitors is problematic, with the Burren and Cliffs of Moher Visitor Centre as the honey-pot attraction having over 1.5 million visitors in 2017, reaching capacity at certain times.

It is **recommended** that a comprehensive, sustainable transport plan is developed for the Burren and Cliffs of Moher UNESCO Global Geopark. This should be developed in the context of the implementation of the strategic regional plan for tourism referred to above.

3. The analysis of the extent to which the integration of sustainable tourism and conservation actually works on the ground (Part 2 of the review) and the policy gaps identified in Part 3 through the discussion of case studies, and the broader scope of the GeoparkLIFE programme, has identified that there are problems with current policy approaches. These have tended to be compartmentalized, emphasizing the importance of individual policies and agencies rather than adopting an integrated approach.

There is a problem with the communication both of policy and the operational approach of different agencies. Tourism businesses and community groups can experience difficulty in understanding the complexity and diversity of policy. The structure and work of the GeoparkLIFE Steering Committee, developed in the process of carrying out the LIFE programme, is seen as providing a model for a collaborative, inclusive and integrated management approach which resonates with changes in international approaches to conservation management.

It is **recommended** that all the stakeholders and partners involved in the Burren and Cliffs of Moher UNESCO Global Geopark formally recognise and commit to the future sustainability of this landscape as a high value heritage destination through an integrated, proactive management approach.



6.4 An effective policy framework

4. It is clear from the views of the partners and stakeholders in the LIFE programme, as expressed in Part 2 of the policy review, and recommendation 3 above, that there is a need and support for a suitable management structure.

It is **recommended** that the current partnership model involving the active participation of all the relevant agencies involved in heritage conservation and sustainable tourism should be continued and developed in accordance with the best practice models identified in the comparative analysis.

5. Under the *Operational Guidelines for UNESCO Global Geoparks* the Burren and Cliffs of Moher Global Geopark is required to have a management plan that provides for the social and economic needs of local populations, protects the landscape in which they live and conserves their cultural identity.

It is **recommended** that a comprehensive, strategic management plan is developed for the Burren and Cliffs of Moher UNESCO Global Geopark, based on the *Guidelines for UNESCO Global Geoparks*.

6. The Burren and Cliffs of Moher UNESCO Global Geopark, and the GeoparkLIFE programme, are run under the auspices of Clare County Council. It is a specific objective of the Clare County Development Plan 2017-2023 to work in partnership with all relevant stakeholders to support the ongoing work of the Geopark and to secure the retention of its status.

It is **recommended** that the management plan for the Burren and Cliffs of Moher UNESCO Global Geopark should be fully and formally incorporated into the next iteration of the Clare County Development Plan. The management plan should be added as an appendix to the County Development Plan.

5 The wider challenge of integrating tourism with conservation

7. The GeoparkLIFE project illustrates how an informal structure of agencies working with communities can bring





together expertise and knowledge at a local level. This is a good way of creating collective responsibility and an ability to address local needs. The GeoparkLIFE structure also illustrates how a locally based approach is the way towards resolving conflict. The notion of a collaborative and integrated approach to management is essential if sustainable tourism and conservation management are to sit side by side.

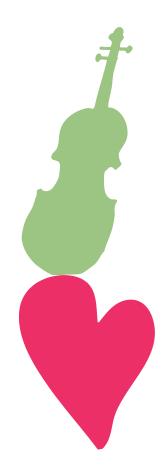
It is **recommended** that the core principle of the need for effective local management as essential to successfully and sustainably integrating tourism and conservation is recognised as an approach to meeting the European challenge of achieving this integration.

8. A critical European wide issue is whether we can move from processes focused on expert-led and centralized approaches to the integration of tourism and conservation to those where expertise feeds into and informs community involvement and initiatives. Successful community projects need accessibility to experts who understand the needs of projects (from health and safety to environmental legislation) and who will provide guidance through a structured process.

It is **recommended** that programmes seeking to have active community involvement in the integration of tourism and conservation have two core elements:

- (a) effective local management structures to integrate sustainable tourism and conservation, building on the public, private and community sectors.
- (b) a community liaison officer with the requisite skills and expertise ideally located within the competent local authority and in the type of management structure recommended above.

These two measures would add strength and assist with specific projects. It would also help to build social capital in strengthening connections and relationships between groups. Furthermore it would integrate such informal social networks with the capacity and the strategic development function of the local authority.



burrengeopark.ie

