Submission

from the

Irish Tourist Industry Confederation

on

Budget 2011

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Summary

While there are some indications that the global economy may be starting to stabilise, the pace of recovery will be modest at best. Our international source markets remain weak and economic growth is likely to be anaemic in 2011. The prospects for the domestic market are also uncertain given the scale of the challenges and risks facing the Irish economy.

This is a very tough and highly competitive operating environment for the Irish tourism industry, an industry already weakened by the impact of the recession, excessive investment in capacity growth, and the fall-out from the near collapse of the Irish banking sector. In this context, the measures taken in Budget 2011 will be of critical importance to the industry. While recognising the adverse circumstances facing the Government in framing this Budget, it is vital for the tourism industry and the wider economy that Budget 2011 should not worsen the industry's situation, and should promote economic activity to the greatest extent possible. With this in mind, the Budget 2011 strategy should prioritise:

- Continued investment in the international promotion of Ireland
- Restoration and enhancement of national competitiveness
- Stimulation of economic activity and avoidance of actions that would further damage enterprise and employment.

In pursuit of this strategy, ITIC strongly recommends the adoption of the following five measures. For further details on these, please refer to the relevant sections of this submission:

1) **Tourism Marketing:** continue to invest in overseas tourism marketing in the recognition that sustained marketing is a long-term requirement and one that is vital to the recovery and future growth of Irish tourism (Section 3.1).

2) **Competitiveness:** ensure that Budget 2011 addresses obstacles to the restoration of competitiveness to the Irish economy, notably by (Section 3.2):

   - abolishing the Joint Labour Committees and placing a freeze on public sector and minimum wages.
   - reducing public sector and local authority charges, including commercial rates.
   - avoiding the introduction of additional charges, fiscal measures or new regulations that would further undermine our competitiveness.
   - accelerating high-speed broadband roll-out and the introduction of new generation broadband.

3) **Access to Credit:** this is a most basic need for tourism enterprises and, with the withdrawal of Bank of Scotland Ireland from the market, the Government should take steps to ensure that appropriate credit facilities are provided at competitive terms by other Irish banks, if necessary, through the establishment of a new Industrial Credit Corporation. A business loan guarantee scheme should be introduced by Government, based on similar schemes in operation in the UK and elsewhere, whereby at least 50% of qualifying loans to viable businesses are guaranteed and borrowers pay a small (2%) premium to support the scheme (Section 3.3).

4) **Access:** facilitate easy and low-priced access to Ireland by air and sea, through the avoidance of cost increases and abolition of the €10 passenger tax, at the very least for a 2 year trial period (Section 3.4).

5) **VAT:** raise the VAT registration threshold for suppliers of services to the same threshold applied to suppliers of goods to reduce the costly bureaucratic burden on small/medium enterprises (Section 3.5).

6) **C.S.O.:** the overseas travel results should be returned to a monthly frequency (Section 3.6).

1. INTRODUCTION

The severe downturn precipitated by the global economic crisis has continued to curtail outbound travel demand from Ireland's major source markets. This was further compounded by the volcanic ash cloud phenomenon in April/May, 2010. Overseas visitor numbers during the first 6 months of the year were down by 20.5% on the same period in 2009. Even making allowance for a better performance in the second half, it is probable that a further decline of at least 10% in visitor numbers (up to 700,000) and a revenue drop of up to 12.5% (€500 million) will emerge for 2010 as a whole. In short, the likelihood is that, in 2010, Ireland will receive at least 1.5 million fewer visitors than in 2007[1].

Domestic performance is more difficult to predict at this stage, but it seems probable that trips will be down by about 5% (400,000+) and revenue by a more pronounced 15% (€200 million+).

Despite this precipitous decline over the past two years, tourism is still an industry worth over €5 billion annually providing about 190,000 jobs and accounting for 3.8% of Ireland's GNP in revenue terms. It is an indigenous industry which cannot be off-shored, and it is an industry which has significant linkages with other Irish sectors such as the Irish food industry. Importantly, it has the capacity to recover and prosper again provided it is given the right supports. In summary, the tourism and hospitality industry in 2009:

- generated **€3.9bn** in overseas earnings
- attracted **6.6m** visitors from overseas
- employed **190,000** people either full or part-time
- generated economic activity throughout the country: 70% of employment in tourism and almost 70% of tourist expenditure is outside of Dublin.

Tourism as an export industry can play an important role in restoring the Irish economy to growth and, while the current numbers make depressing reading, there are some positive signs emerging that the steep fall in visitor numbers has bottomed out. ITIC recognises the precarious fiscal situation in which Ireland finds itself. However, Ireland is not alone in having suffered a sharp downturn in its tourism industry. It is vital that we are well positioned and ready to compete in what is likely to be a fiercely competitive marketplace from 2011 onwards.

[1] '*A Changed World for Irish Tourism - Facing up to the Challenges of Recover* '(July 2010)

2. TOURISM TRENDS AND OUTLOOK

2.1 Tourism Performance and Outlook 2010

The indicators for Irish tourism in 2010 remain poor with a further deterioration on 2009 results. The number of visitors to Ireland for the first six months of the year was down by 20.5% compared to the same period in 2009. Undoubtedly, the volcanic ash cloud phenomenon which closed Irish airspace for periods in April and May contributed to the steep fall. However, the main factor undoubtedly has been the international recession which continues to affect our major source markets.

In total, 2.6 million trips were made to Ireland during the first six months of 2010, nearly 700,000 less than in 2009. The decline was most marked among visitors from Britain and Mainland Europe, where the reductions amounted to 22.3% and 24.4% respectively.

Table 2.1: Tourism to Ireland, Jan-June 2007-2010

Market	J-J 2007 (000's)	J-J 2008 (000's)	J-J 2009 (000's)	J-J 2010 (000's)	Change in '10 (%)
Britain	1,845.4	1,872.6	1,580.9	1,228.5	-22.3
Mainland Europe	1,160.5	1,209.1	1,146.9	867.1	-24.4
North America	475.3	468.1	447.2	401.4	-10.2
Rest of World	135.2	151.9	129.1	129.5	+0.3
Total	**3,616.4**	**3,701.7**	**3,304.1**	**2,626.5**	**-20.5**

Source: CSO, Overseas Travel June 2010

At the time of writing, figures for domestic tourism were only available to the year end 2009. Overall the number of trips in 2009 was the same as that for 2008, but the number of leisure trips and nights was down by over 8% - see Table 2.2. Total expenditure fell by 10% reflecting both the reduced number of trips and price reductions. All the indications are that the numbers are down even further in 2010 with, for example, Fáilte Ireland's tourism barometer[2] stating that one third of hoteliers experienced falling domestic demand for the first six months of the year compared with the same period in 2009.

[2] Wave 2 June 2010 – latest available

Table 2.2: Domestic Tourism, Jan-Dec 2008-2009

Market	J-D 2008 (000's)	J-D 2009 (000's)	Change '09 (%)
Total Trips	8,339	8,340	0.0
Total Nights	26,195	26,027	-0.6
Holiday Trips	4,398	4,037	-8.2
Holiday Nights	15,654	14,320	-8.5
Total Expenditure (€m)	1,546.0	1,389.8	-10.1
Holiday Expenditure (€000)	1,027.9	843.3	-18.0

Source: CSO Household Travel Survey

Many of the economic factors that were influencing tourism in 2009 continued to affect the performance of Irish tourism in 2010 and can be summarised as follows:

- Economic growth is sluggish at best in major source markets with real GDP growth, in 2010, hovering just above 1% in the UK, France and Germany and just above 3% in the US.
- Unemployment remains high in all source markets with concerns about future employment a continued worry, thereby impacting upon consumer confidence and expenditure.
- Ease and cost of access remain issues. There has been no improvement on the 11% reduction in air access capacity from Britain, the US and Mainland Europe experienced between Summer '08 and Summer '09, with 2010 being a year of further contraction in Ryanair and Aer Lingus services to Ireland. Indeed, capacity on scheduled services in summer 2010 was down by 6% on summer 2009.
- Oil prices have risen since mid 2009 and are expected to continue rising.
- Overseas and domestic market consumers have not just contracted their overall spending; they have become significantly more value conscious, particularly with regard to big ticket items such as holidays abroad.

Taking these factors into account, a range of projected outturns for 2010 is summarised in Table 2.3.

Table 2.3: Projected Results for Irish Tourism 2010

	Overseas		Domestic	
	Visitors	**Revenue**	**Trips**	**Revenue**
Best Case	-10%	-12.5%	0	-10%
Central Projection	-12%	-18%	-5%	-15%
Worst Case	-14%	-21%	-10%	-20%

Source: CHL Estimates.

2.2 Outlook 2011

While most western economies appear to be emerging from recession, employment and consumer spending will lag behind. This combined with concerns about 'double-dip' recessions and ongoing worries around the stability of the euro zone will undoubtedly affect consumer confidence and hence there is little likelihood of a nurturing economic environment for Irish tourism. This and other key factors impacting the short-term outlook can be summarised as follows:

- **Economic Growth**: Positive albeit very modest economic growth is being recorded in 2010 in each of Ireland's four major source markets (UK, USA, France and Germany). Current forecasts for 2011 point towards a continuation of this slow recovery with the US expected to achieve a growth rate of 2.9% in 2011, the UK, 2.1% and France and Germany 1.6%.[3]

- **Consumer Spending:** Despite small growth rates being recorded for each of Ireland's four major source markets, unemployment rates of 10.1% for the US, 8.6% for the UK, and 9.1% for Germany will remain at similar levels in 2011.[4] Tax increases, interest rate increases and oil price increases will also continue to mark 2011. As a result, consumer spending is unlikely to increase and those that do spend will do so cautiously.

- **Competitiveness:** Competitiveness remains an issue for Ireland and, while 2010 has certainly seen some improvements, considerable additional gains need to be made in this area, as discussed in Section 3.

[3] IMF
[4] A Changed World for Irish Tourism / The Economist

- **Access Capacity and Costs:** Cuts in capacity implemented by airlines continued in 2010 while ticket prices rose. The continued imposition of the departure tax is impacting negatively on cheap access to Ireland and is further discussed in Section 3.

- **Domestic Market:** Despite some positive indicators such as a (forecast) marginal increase in annual GDP, the perception is of a continued severe recession, compounded by the high unemployment rate and resulting low level of consumer confidence. These factors have affected the domestic market in 2010, although a strong marketing campaign by Fáilte Ireland and an interest in 'staycations' has mitigated their impact.

- **Car Rental Issues:** The expected shortfall in the car rental fleet did not materialise to the degree anticipated, mainly because the expected level of demand did not occur. More "used" cars than ever were used on the fleet, and adequacy of automatics on the short peak season fleet remains a problem.

Ireland's tourism industry continues to endure extremely difficult market conditions which are likely to persist into 2011. **In this situation, it is vital that the Government avails of the Budget to support tourism, and puts in place measures to facilitate its longer term growth.**

3. DETAILED RECOMMENDATIONS

3.1 Tourism Marketing

Recommendation 1:

Tourism Marketing: continue to invest in overseas tourism marketing in the recognition that sustained marketing is a long-term requirement and one that is vital to the recovery and future growth of Irish tourism.

ITIC warmly welcomed the €155 million allocation for tourism in Budget 2010 (representing a 2% increase on 2009 levels) along with the travel discount scheme introduced for visiting senior citizens. Of this, the tourism marketing fund was allocated €44.25 million in keeping with a recommendation made by the Tourism Renewal Group that overseas marketing be maintained '*in real terms, to ensure continued impact and sustained returns'*.

As intended, tourism agencies did pursue aggressive marketing campaigns in Ireland's source markets, specifically the UK, Germany and the US, with for example a specific mid-year €20 million marketing programme rolled out in May 2010, to tap into the trend of later trip booking.

Investments have also been made in business tourism and cultural tourism, both of which are now well placed to benefit from new facilities within the country such as the Convention Centre in Dublin, Aviva Stadium and the Grand Canal Theatre.

It is imperative that these and other efforts be maintained and built upon with a specific targeted focus, maximising the use of limited resources, in Ireland's principal source markets, Britain, the US, Germany and France.

At present there are grave concerns over Ireland's largest source market, Great Britain. Figures available for the month of June may seem to indicate a slowdown in the rate of decline from this market - however it is too early to categorically state that this represents a turnaround and there can be no avoiding the reality that 644,000 less British people visited Ireland in the first six months of 2010 than did in the same period in 2008. Reasons include doubts over the future of the British economy, which impinge on British consumer confidence, an overall decline in UK outbound travel, a weaker sterling euro rate, (albeit not as weak as in 2009) and increased competition from Scotland. Recovery of this market is key to the recovery of tourism in Ireland, and the industry is convinced that Britain can yield more visitors for Ireland provided the potential market is correctly targeted with effective messages and offerings.

ITIC would argue that visitor numbers would be even worse than they are in the absence of the marketing and promotional activities which have been implemented in and prior to 2010. It is crucial that overseas marketing investment be maintained so as to ensure that:

1. the Tourism Brand Ireland is not compromised in the longer term;
2. overseas visitors remain favourably disposed towards Ireland as a destination; and
3. Ireland's increased tourism capacity is more sustainably utilised.

While markets are expected to stage some recovery in 2011, there is no doubt that the competition to attract demand will be more intense than ever. This is not the time to cut back on marketing – the battle for market share will demand well-resourced and highly focused campaigns to produce the results necessary to propel tourism forward as a key contributor to the Irish economy and employment.

As recommended in the report - '*A Changed World for Irish Tourism'* - published by ITIC in July 2010, the emphasis in marketing should be on the 4 major source markets of Britain, USA, France and Germany. Of these four, the leading priority must be Britain, our top source market, which is the primary source of high volume traffic to Ireland.

3.2 Competitiveness

Recommendation 2:

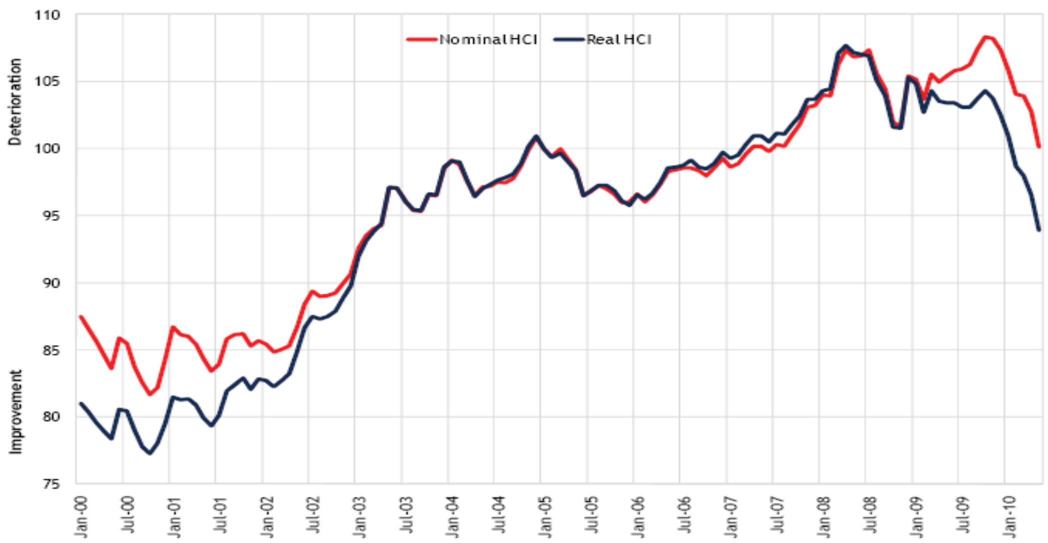
Competitiveness: ensure that Budget 2011 addresses obstacles to the restoration of competitiveness to the Irish economy, notably by:

- **abolishing the Joint Labour Committees and placing a freeze on public sector and minimum wages.**
- **reducing public sector and local authority charges, including commercial rates.**
- **avoiding the introduction of additional charges, fiscal measures or new regulations that would further undermine our competitiveness.**
- **accelerating high-speed broadband roll out and the introduction of new generation broadband.**

In its pre-budget submission in 2009, ITIC recommended that Budget 2010 should contribute to the cost adjustments required to restore competitiveness to the Irish economy. It is acknowledged that some competitiveness has been restored and in particular by the tourism industry.

For example, the 2009 World Economic Forum Travel and Tourism Competitiveness Index ranked Ireland 18th out of the 133 countries surveyed, representing an improvement of three places on the 2008 ranking[5]. However, the perception of Ireland being poor value for money continues to persist in Visitor Attitude Surveys, with 21% of visitors to Ireland in 2009 expressing dissatisfaction with value for money and just under half (49%) saying that it offered good value. The appreciation of the Euro against both sterling and the US dollar affected perceptions, but Ireland's real Harmonised Competitiveness Indicator in May 2010 was still 16% above its level in 2000 although it has improved 6% since January 2005 - see Figure 3.1.

Figure 3.1: Price Competitiveness Indicator for Ireland 2000-May 2010



Source: NCC Benchmarking Ireland's Performance 2010 Report, July 2010

There are still a great number of outstanding issues affecting competitiveness which must be addressed if a competitive positioning is to be ensured for Ireland. This will enable the country and tourism industry to benefit from any recovery in international

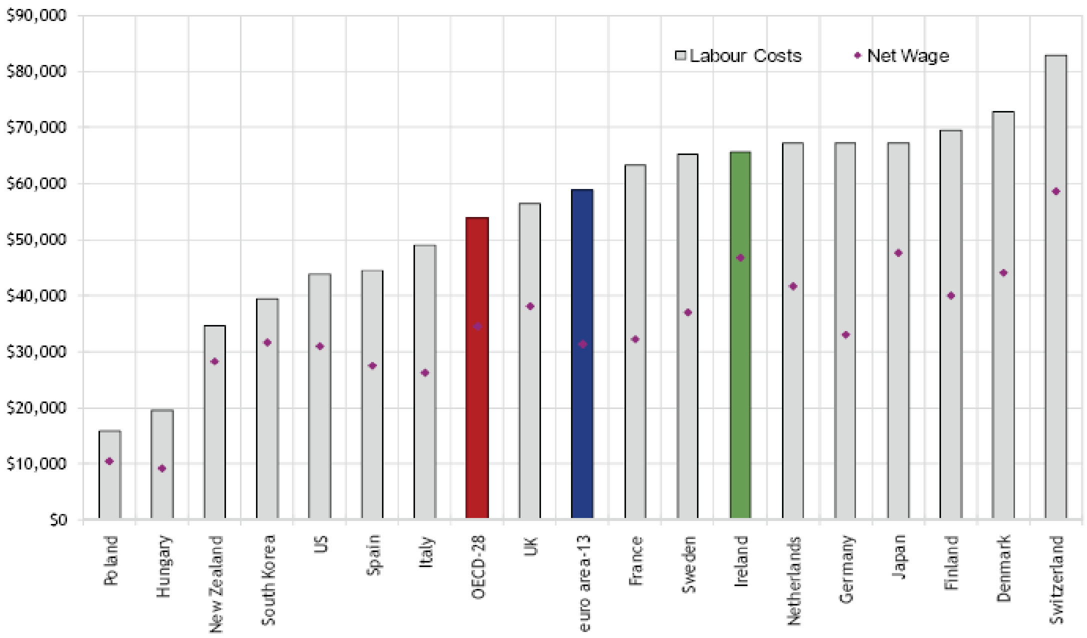
[5] '*A Changed World for Irish Tourism - Facing up to the Challenges of Recover* '(July 2010)

markets as well as being able to appeal to the increasingly more value conscious tourist. Key concerns should be addressed in Budget 2011.

- **Facilitate an Effective Reduction in Labour Costs by abolishing the Joint Labour Committees and placing a freeze on public sector and minimum wage**:

  Labour costs and prices in sectors that are not exposed to international competition remain high. For example, Ireland has the tenth highest total labour costs level in the OECD. Ireland also has the fifth highest net wage level in the OECD-28, 35.5% above the OECD average – see Figure 3.2 (in which the bars represent total labour costs, inclusive of employer's PRSI etc., and the dots in the bars represent net wages.)

Figure 3.2: Average Total Labour Costs and Net Wages, 2009



Source: NCC Benchmarking Ireland's Performance 2010 Report, July 2010

Ireland's minimum wage of €8.65 is the second highest in Europe after Luxembourg, and the minimum rate set by the Joint Labour Committee is even higher. The reality is that high labour costs are undermining the hospitality sector. In view of the strong labour and employment legislation now in place, ITIC believes that there is no longer a requirement for the Joint Labour Committees and that they should be abolished. A long freeze should be applied to both the minimum wage and to public sector pay.

It is ITIC's belief that good labour legislation is already in place in Ireland and that no industry within the country can afford the consequences of higher labour costs. Hence rather than advocating a reduction in the minimum wage, ITIC is calling on the government to put in place a long wage freeze.

- **Reduce public sector and local authority charges, including rates:**

  Local authority charges have risen continuously and steeply over the past decade. Apart from substantial increases in rates, there have also been steep increases in other areas such as water and waste charges. For example, the Consumer Price Index shows that water supply, refuse and waste charges rose by 130% between December 2001 and December 2009 - overall inflation during the same period was just over 20%. While there has been some stabilisation in 2010, there is a need to roll back the very large increases of recent years by at least 10%.

  The business community already contributes a very large share of local authority revenues. In rural areas with low levels of industry, it is often the tourist businesses - hotels, restaurants etc. - that carry the main burden of local authority rates and other charges. In fact, the Irish Hotels Federation has shown that the 900 hotels in Ireland together pay 6% of the national rates bill. Given the circumstances in which the industry finds itself, there is no capacity to bear further increases in local authority rates and charges. Indeed, a reduction in rates with a 30% waiver pending completion of the countrywide revaluation by the Valuation Offices should be effected. Moreover, there should be greater transparency in the structuring of charges on businesses to ensure that there is clarity and equity in their estimation and levying.

- **Avoid the introduction of additional charges, fiscal measures or new regulations that would further undermine our competitiveness:**

  Government may recognise the need to improve cost competitiveness but the public sector, which is directed by the Government, is acting contrary to this objective. The public sector has not been a significant contributor to improved cost competitiveness. A recent example is the introduction of an additional levy (Public Sector Obligation levy) on electricity customers from 1st October. This levy is a very badly timed additional imposition on businesses that are already struggling.

- **Accelerate high speed broadband roll-out and the introduction of new generation broadband:**

The report recently published by ITIC - *Tourism and Travel Distribution in a Changed World,* September, 2010 – has highlighted the fundamental importance of online channels to effective tourism marketing and sales. The importance of these channels will continue to increase in the coming years. It is critical for Ireland's tourism industry that the necessary communications infrastructure is in place to enable it to exploit and, indeed, develop an international leadership position in online product distribution, sales and marketing.

In June 2010, Ireland was ranked at 17th position out of 70 countries in the Economist Intelligence Unit's digital economy rankings. [These rankings are based on a multi-criteria assessment of a country's ability to use information and communications technology for social and economic benefit.] While this was an improvement over the 18th place recorded in 2009, it was below the 14th place achieved by Ireland in 2001, which indicates that we are being overtaken by our competitors.

Of some concern is that on a simple comparative rating of download speeds in September 2010, Ireland was ranked at 51st out of 160 countries. At 6.19Mb per second, Ireland was 40% below the EU average (10.86 Mbps) and only Italy and Cyprus recorded slower speeds among EU Member States[6].

It is essential that, in the short term, all Irish tourism businesses can secure broadband connections of 20 Mbps. In the medium term, the goal should be to make speeds of 100-150 Mbps available to all businesses. The slow pace of investment in telecommunications infrastructure over the past 10 years has inhibited broadband roll out. It is imperative that this experience is not repeated in the next decade. The Government must ensure that appropriate incentives and regulations are in place to achieve the above goals.

[6] Oakla Net Metrics, www.ookla.com., 2010

3.3 Access to Credit

Recommendation 3:

Access to Credit: this is a most basic need for tourism enterprises and, with the withdrawal of Bank of Scotland Ireland from the market, the Government should take steps to ensure that appropriate credit facilities are provided at competitive terms by other Irish banks, if necessary, through the establishment of a new Industrial Credit Corporation. A business loan guarantee scheme should be introduced by Government, based on similar schemes in operation in the UK and elsewhere, whereby at least 50% of qualifying loans to viable businesses are guaranteed and borrowers pay a small (2%) premium to support the scheme.

Access to and the cost of credit is a major issue for the tourism industry – and indeed, for enterprises in all other sectors of the economy. Companies in the tourism sector have difficulty obtaining credit and, if they do obtain it, pay higher interest rates than their counterparts elsewhere in the Euro area. The near collapse of the banking sector in Ireland, the need for Irish banks to restore their capital ratios and the higher prices paid for funds by the banks themselves have all contributed to this situation.

The difficulties faced by the tourism industry will now be greatly exacerbated by the withdrawal of Bank of Scotland Ireland (BOSI) from the market. BOSI currently has loans in excess of €2bn out to the hotel sector alone; in particular, it provides overdraft facilities to some 350 properties. It is not evident that there is an appetite among other banks in Ireland to take over the provision of these facilities.

In these circumstances, it is vital that the Government takes steps to ensure that there is adequate access to credit for viable tourism enterprises. The Government is a substantial shareholder in AIB and Bank of Ireland, and owns Anglo Irish Bank. If these ownership stakes cannot be used to leverage an adequate flow of credit to enterprises, especially in the face of BOSI's withdrawal, the Government should be prepared to implement more radical measures such as the re-establishment of an ICC-type bank to provide credit for enterprise.

We specifically recommend that Government introduce a loan guarantee scheme for viable small and medium sized enterprises, to enable viable businesses to access credit in cases where they have failed to obtain a conventional loan because of lack of security. Such schemes are now in operation in the UK and the USA, and in many eurozone states including France and Germany. The guarantee in the UK is up to 75% of the loan amount with a maximum loan exposure of £1 million. Borrowers pay a premium on the interest rate.

It is recommended that the business loan guarantee scheme in Ireland should be structured in a similar way to that in the UK, and should cover at least 50% of loan amounts. Borrowers would pay a premium of 2% in interest with this premium effectively acting as an insurance bond.

3.4 Access

Recommendation 4:

To facilitate easy and low-priced access to Ireland by air and sea, through the avoidance of cost increases and abolition of the €10 passenger tax, or its suspension for a 2 year period.

It is well documented that low cost carriers have made a major contribution to growth in Irish tourism over the past two decades. However in recent times, capacity has been reduced. For example, total available capacity on direct scheduled air services to Ireland for the summer season 2010 was 6% less than it was in summer 2009, which was already 11% down on 2008 levels[7]. In part this was because of reduced demand and an overall decline in world travel. However, the impact of the associated costs of flying in and out of Irish airports has not helped stimulate demand and it is imperative that this issue be addressed.

The €10 airport departure tax introduced in 2009 on passengers travelling to international destinations remains an unnecessary disincentive to tourism and is an added barrier to travel which is counter to stimulating increased tourism activity. The majority of other EU member states no longer impose such a tax. Indeed, in 2009, Holland abolished it on the basis that while it raised an extra €312 million in tax receipts, the overall cost to the economy was over €1 billion in lost revenue.[8] Belgium, Denmark, Spain, Sweden and Malta have also since abolished their departure taxes.

Tourist traffic through Irish airports has been in decline since 2008, a particularly worrying trend for an island destination. Anything which adversely impacts on air access must be avoided and hence ITIC is calling for the immediate abolition of this tax. Or at the very least, the suspension of the departure tax for a 2 year period with effect from January 1st 2011. This would allow adequate time to test the claims by low cost carriers that the removal of the tax would lead to new services and large increases in overseas visitor numbers.

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[7] A Changed World For Irish Tourism (July 2010)
[8] (*source: - eturbonews – Global Travel Industry News -* http://www.eturbonews.com/10256/rise-uk-departure-tax-could-cut-londons-european-gateway-role)

3.5 VAT

Recommendation 5:

Raise the VAT registration threshold for suppliers of services to the same threshold applied to suppliers of goods, in order to reduce the costly bureaucratic burden on small/medium enterprises.

In ITIC's 2010 submission, it was recommended that the VAT registration threshold for the suppliers of services should be increased to match the threshold for the suppliers of goods. No change was made and hence, any supplier who has an annual turnover exceeding €37,500 must continue to undertake the costly bureaucratic exercise of registering and paying VAT, a red-tape burden for many smaller suppliers.

Again, ITIC are recommending that the threshold be increased to correspond with that of suppliers of goods which remains at €75,000 and again, ITIC reiterate that there is no good reason why there should be such discrimination between goods and services.

3.6 C.S.O.

Recommendation 6:

The unilateral decision by the Central Statistics Office (C.S.O.) to cease producing the Overseas Travel results on a monthly basis is a retrograde step and should be reversed. The availability of quality and timely results was never more critical, and quarterly aggregate reports are not an acceptable alternative.