Malta's Tourism Policy: Standing Still or Advancing towards Sustainability?

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Abstract

As with most warm water islands, Malta's tourism has been historically focused on 'sun, sea and sand' package holidays. As a result, the ratio of visitors to locals has expanded very quickly and the strain on infrastructure from too many tourists is evident. As do other small islands, Malta also suffers from an absence of pluralism amongst the political-economic elite and a familiarity between voters and politicians, thereby creating barriers to implementing successful policies. Through an examination of how successful tourism policy implementation has been to date, this paper examines Malta's tourism development as it relates to sustainable tourism. The paper addresses the economic, social and political implications of tourism development as well as discusses barriers to implementing a tourism policy specifically geared to sustainability. The paper concludes by providing insights into sustainable tourism policy implementation issues for other island destinations.

Keywords: sustainability, tourism, islands, Malta, rejuvenation, policy implementation, Mediterranean

Introduction

Island territories share many similarities: they have discrete, physical boundaries, within which dynamics are more clearly inter-related. Clear borders often suggest confinement to the islanders while, in turn, this specificity is often a draw for tourists seeking escape and relaxation (Gössling & Wall, 2007). Many island states are also micro communities. As Richards (1982:154) argues, islands are contained and inclusive in most social respects, possessing their own organs of political representation and a self-conscious political identity. As well as islands being accentuated by their social characteristics, warm water islands also share similar geographic characteristics as most are mainly situated in what Turner and Ash (1975) called the 'pleasure periphery':

> "This periphery has a number of dimensions, but is best conceived geographically as the tourist belt which surrounds the great industrialised zones of the world. Normally, it lies some two to four hours flying distance from the big urban centres, sometimes to the west and east, but generally toward the equator and the sun" (Pearce, 1995:10).

These 'warm water' destinations have historically focused on sun, sea and sand tourism for development purposes and many destinations are dependent on this type of mass tourism for a large proportion of their GDP (Gössling & Wall, 2007; Dodds, 2007). Mass tourism, developed quickly and with little differentiation, has forced islands to compete with other islands or sun, sea and sand destinations, often resulting in the neglect of historical, cultural and environmental impacts for the rest of the island. In addition, up/down turns in tourism numbers have rapid multiplier effects on the rest of the island economy and infrastructure strains are quickly felt as are the ratio of visitors to locals. This stage is often referred to as the decline stage in Butler's (1980) destination lifecycle model, which explains various stages which a destination faces moving from exploration to involvement, development, consolidation and then either decline or rejuvenation. With uncontrolled growth and overdevelopment, the quality of the tourist experience is often eventually reduced and a destination's comparative natural-unique-real advantage is lost.

As various authors (Briguglio *et al*., 1996; Butler, 1999, Ioannides, 1995; Mowforth & Munt, 1998) have outlined, the potential negative effects of island tourism showcase the need to move towards more sustainable forms of development and policies to manage and control tourism growth. The debate about sustainable tourism really took off when Krippendorf (1987) wrote about tourism's role as a potential burden on cultures, economies and the environment. This debate continued in earnest and, since the 1990's, literature frequently outlines the need for more sustainable tourism (May, 1991; Butler, 1993; Stabler & Goodall, 1996; Argawal, 2002).

This paper outlines Malta's movement towards sustainable tourism, how a policy relating to sustainable tourism came into effect and the level of implementation it has achieved. Insights from various stakeholders, non-governmental organizations (NGOs), the public and private sectors will be outlined and mitigation strategies extracted from the research will be proposed. It is hoped that the findings from this research will be also useful to other destinations that are facing issues of sustainable tourism policy implementation.

Sustainable Tourism in Malta

Malta has marketed itself internationally as a sun, sea and sand destination. With a population of just over 400,000, Malta is the most densely populated country in Europe. It has a good reputation as a safe destination, within a 3-hour flight to most European cities. The islands, made up of Malta, Gozo and Comino, cover an area of 316 km^2 (120 square miles), are located 100 km (60 miles) south of Italy in the Mediterranean sea. Tourism contributes some 24% of GNP, 25% of goods and services, and 41,000 full time jobs (27% of total employment) (Malta Tourism Authority [MTA], 2007). Tourism is the country's 3rd largest industry and consumes 10% of total lending from local banks (MTA, 2004). The mean length of visitor stay is 9.5 nights. Tourism arrivals in Malta increased steadily since the mass tourism boom of the 1960's until the late 1990's. Malta still depends substantially on the UK market for tourist arrivals, but the German market share has been increasing (see Table 1). Over half the visitors to Malta are repeat visitors. Tour operators generate 85% of tourism, and 74% of arrivals come between April to October, staying mainly in the resort town of Bugibba (see Figure 1).

Figure 1: Map of the Maltese Islands – retrieved from: www.openworlduk.com/Map%20Malta.gif

Table 1: Visitations to Malta by Country: 2000-2006

Year	UK	Germany	Italy	Other	Total
2000	428,780	204,740	92,522	489,671	1,215,713
2001	451,530	160,262	93,564	474,789	1,180,145
2002	444,335	142,106	100,875	446,498	1,133,814
2003	459,565	125,011	94,175	447,850	1,126,601
2004	Data not available				1,156,028
2005	483,171	138,216	92,454	457,502	1,171,343
2006	431,340	125,811	112,549	454,533	1,124,233

Sources: Ministry of Tourism (2000:12); Deloitte Malta Tourism Review (2004); Malta Tourism Authority Statistics.

Table 2: International Arrivals in Malta: 1959-2006

Year	International Arrivals
1959	12,583
1970	170,853
1998	1,182,240
2006	1,124,233

Sources: Ministry of Tourism (2000:12); Deloitte Malta Tourism Review (2004); Malta Tourism Authority Statistics.

Issues of sustainability have only recently come into focus because of a decrease in tourism numbers in 2003 and then again in 2005 & 2006 (see Table 2).

From the 1960's to the mid-1980's, "many residents [in Malta] appeared to have tolerated mass tourism's unwanted costs because of their perception of its substantial economic benefits" (Bramwell, 2003:8). By 1975, the number of visitors had exceeded the number of residents and this was increasing pressure significantly (Mitchell, 1996:204). In the early 1990's, the oppression and pressure on the social and physical environments were being felt (Bramwell, 2003), although it was not until the early 2000's that Malta began to acknowledge the effects of tourism's negative impacts as well as of economic losses once tourism numbers started to decline:

> "… as tourist arrivals topped one million annually, the Maltese began to feel oppressed by the effects of pressure on the social and physical environment. The lack of a strategic plan and widespread abuse of what building regulations there were … resulted in disorderly, unsightly, and often jerry-built construction" (Boissevain & Theuma, 1998:99).

A possible emergence of environmental and social concerns in tourism (a part of the triple bottom line, based on economic, social, environmental considerations) was the growing consumption of land and natural resources by building development (Bramwell, 2003:12). After the mid-1980's, the government's approach to tourism was to attract 'quality tourists' and additional promotion of cultural tourism was undertaken. In 1987, a new hotel policy called for all new hotels to be 4-star or 5-star to improve standards. There was also a slowdown on issuing building permits, and subsidies for hotel building were eliminated. Although the government began to focus on quality and undertook the development of large scale and luxury facilities (such as marinas and hotels), the quality improvements were focused on economic gains with no great consideration for the environment.

There were other policies focused on improving quality and these started to focus on the environment in Malta. An annual tax on fresh water was implemented for swimming pools (Lm150 for private pools and Lm250 - Lm500 for hotels, depending on size)[1]. An Institute for Tourism Studies was also established in 1992 which introduced a course in Tourism Culture as part of the certification of tour guides (it is currently illegal to guide without a license in Malta). In addition, the Development Planning Act of 1992 set up the Malta Environment & Planning Authority (MEPA) which authorises the control on land development and building in accordance with approved policies and procedures as set out by the 1990 Structure Plan (Boissevain & Theuma, 1998: 99). There were also numerous environmental and land use controls such as the Planning Authority Structure Plan's Development Zones (2000: 9) to keep the building of tourist accommodation in check and general procedures set up by both the Malta Environment & Planning Authority (MEPA) and the Malta Tourism Authority (MTA) for new building construction.

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[1] (Lm1 = €2.326 =US$3.11)

It was not until 1989 that a Tourism Master Plan was completed for Malta by Horwath & Horwath Consultants. In this plan, a number of recommendations were made, including the need for a unified organization that looked at development as well as marketing of tourism and the need to diversify away from the UK market. The Master Plan also recommended that the Ministry of Tourism should also encompass culture as the two were interdependent (Ministry of Tourism, 2001). In September, 1999, the MTA took over the function and responsibility of the National Tourism Organization in Malta (NTOM) (national tourism office focused almost exclusively on marketing), as well as the operation of the Hotel & Catering Establishments Board in January 2001. This new structure brought in a number of private sector stakeholders as it was believed this would provide a stakeholder platform to address growing concerns about tourism.

One of the most significant moves towards addressing sustainability was the Carrying Capacity Study, undertaken in the late 1990's. The Carrying Capacity Study proposed the following:
- Sectors contributing to the tourism economy must be maintained by increasing foreign earnings and per capita expenditure.
- Investment must be channelled toward resource efficiency segments.
- Social and private benefits and costs must be assessed to assist in the direction of resource allocation (resources must be allocated to their best use).
- Volume of hotel-type bed stock must be stabilized and quality of service upgraded while occupancy levels and room rates improved.
- Summer volumes must not exceed saturation levels.
- Improvement of current product and better presentation of available options.
<div align="center">(Ministry of Tourism, 2001:31)</div>

The subsequent 2000-2002 Malta Tourism Strategic Plan noted that the Carrying Capacity Study was central to government tourism policy. The plan noted that "the long term future of the Maltese tourism industry is linked to the sustainable management and development of the product. Within this context sustainability means achieving growth in a manner that provides the visitor with a meaningful experience, without causing an adverse impact on the country's resources and social fabric" (MTA Strategic Plan, 2000:10). The 2000-2002 Plan clarified a number of challenges facing the industry: these included moving away from the previous strategy that focused exclusively on price competitiveness and building a more holistic strategy based on value and customer satisfaction. The 2000-2002 Plan called for:
- A repositioning of Malta into a destination of choice.
- The development, upgrading and maintenance of vital components of the existing tourism product.
- A focus on quality standards.
- A new approach to current marketing strategies and target markets.

Although sustainability was mentioned, there were no specific guidelines or objectives set out because, when the 2000-2002 Plan was written, MTA was "finalising the Carrying Capacity Assessment study, which will set a scenario for tourism development and will be used to provide guidelines to the industry" (MTA Strategic Plan 2000-2002:10). The 2002-

2004 Plan was the first to include explicit measures and objectives relating to sustainability. This Strategic Plan was not exclusively focused on sustainable tourism; yet, there are a number of objectives within it which relate to the industry's sustainability, most of which were formulated after the Carrying Capacity Study was officially completed in 2001. The 2002-2004 Plan "embraces the findings of the Carrying Capacity Study, central to government tourism policy, and requires stakeholders as well as strategic partners to coordinate efforts in an integrated approach to problem solving and proactive planning" (MTA 2002-2004 Strategic Plan:5). The objectives set out in this plan mimicked the master plan originally proposed in 1989 by noting that markets must be diversified and that development of the product must be addressed in addition to marketing. A major difference at this time was that a new organizational structure had been created out of the recommendations submitted in the 1989 Master Plan and the new directorates of the MTA had been in operation since 2000. During the period 2000-2004 (when this study was undertaken), the MTA was an umbrella organization comprising a Department of Corporate Services and four Executive Directorates: Marketing and Promotion; Product Planning and Development; Human Resources & Support Services and Enforcement.

The 2002-2004 Strategic Plan seeks to build upon the 2000-2002 Plan and addresses the aims of sustainability in both corporate mission and objectives. Its corporate mission was "… to advance the economic and social activities of tourism in the national interest by working with all stakeholders to develop a sustainable industry for current and future generations". The Corporate Strategies outlined in the 2002 - 2004 Strategic Plan are as follows:

- Deliver value and customer satisfaction by upgrading product, environmental and quality of service
- Implement programmes to exploit Malta's unique value proposition
- Diversify markets to improve seasonality and value
- Provide information for decision-making
- Regulate the industry on the basis of defined standards
- Build alliances with stakeholders

The two main reasons for including sustainability measures in the 2002-2004 policy were that Malta believed that tourists were searching for more than just '3 S' tourism and a recognition that the country needed to offer a more diverse product in order to maintain any competitive advantage (MTA, 2000:8).

Research Methodology and Data Collection

There is no question that movement towards more sustainable forms of tourism in Malta was needed, however, there has been no assessment of the degree to which it has been achieved. The main purpose of this research is to assess how successful the actual implementation of the policy as outlined in Malta's strategic plans (2000-2002 and 2002-2004) has been and whether there were any identifiable barriers to achieving success.

Applied research was used to "find solutions to problems which arise in particular policy, planning or management situations" (Veal, 1997: 28). The approach used in this study was

both descriptive and exploratory in order to gain a broad understanding of the policy implementation process and barriers to achieving objectives. Field questionnaires and interviews were completed in two stages, between early November and early December 2004. The first stage involved identifying the key people in the implementation process and gathering additional information about Maltese tourism and policy. Once key stakeholders were identified, they were given questionnaires and then interviewed face-to-face to gain in-depth knowledge on issues and barriers to policy implementation. During the second stage, the remainder of the interviews were completed. Interviews were undertaken to gain deeper knowledge about respondents' perceptions of the policy which could not be extracted from a questionnaire. A snowball sample approach was used to collect key implementers' names and to ensure that all persons relevant to policy implementation were collected. The total number of 23 people was then validated by the Executive Director of the MTA to ensure all relevant stakeholders were identified. A 100% response rate was achieved in the research consisting of twelve (12) state officials, representatives of five (5) NGOs, and six (6) private sector respondents. Although NGOs are not directly involved in the policy implementation process, they were included in order to ensure a more holistic approach and to act as a check on policy elements and responses by state and business respondents.

Each interviewee was first asked about his/her role, position and influence on tourism policy implementation in Malta; and then asked for the general and specific level of success he/she felt had been achieved with regard to Malta's tourism strategic plans. Specific objectives relating to Malta's 2002 - 2004 Strategic Plan were identified as well as overall sustainability as had been outlined since 2000. Respondents were asked to score the successes of 6 strategic objectives (on a Likert scale of 1-5, where 1 = not at all successful; and 5 = very successful) and to identify any successes and barriers to achieving more sustainable tourism in Malta. To determine key barriers, each respondent who did not think the action items and initiatives were successfully implemented (response scores of less than 5/5) was asked to identify one or more the problems/barriers seen as having impeded the policy implementation process. These findings were then grouped together to examine trends. Additional prompting questions were asked to determine if there were any other policies, influences, or issues the respondents felt had not been addressed in the policy. Respondents were also asked how barriers could be overcome and what was needed to achieve more successful policy implementation. As the Carrying Capacity study and the 2000-2002 Plan both informed the 2002-2004 study, it should be noted that, although specific questions were asked about the 2002-2004 policy, the research addressed the overall attempt to move towards sustainable tourism in Malta since 2000. Moreover, the current tourism board in Malta was undergoing yet another re-organization in 2005 and the situation was liable to further change. In addition, the current strategic plan is not available and therefore more recent referrals have not been referenced.

Findings: Barriers to Implementing Sustainable Tourism Policy in Malta

Although it was unanimously agreed by all respondents that there was a need for sustainability measures within Malta's policy, respondents did not feel that Malta had been successful in achieving more sustainable tourism. (see Table 3).

Examining the strategic action items and initiatives outlined in Malta's strategic plans, the research concluded that there has been a general movement toward considering sustainability, although not very much has been achieved in practice. General awareness of issues of sustainability has been raised among stakeholders, while the recognition that the MTA was in need of restructuring and that tourism needed to be considered a priority was unanimous.

Table 3: Assessment of the Success of Malta's Tourism Policy

The MTA's 2002-2004 Strategy outlines: "MTA will direct tourism development towards a controlled growth scenario, as set by Government Policy based on the findings of the *Carrying Capacity Assessment for the Maltese Islands (2001)"*. How successful do you believe this has been?			
Sector:	**Public Sector**	**Private Sector**	**NGOs**
Success of Action Line: (Score out of 5)	Mean: 3; Mode: 3; Median: 3	Mean: 2; Mode: 2; Median: 2	Mean: 1.8; Mode: 1,2; Median: 2,3
	n =12	*n = 6*	*n =5*

Some positive elements achieved had been that the Prime Minister set up an inter-ministerial task force to specifically look at tourism. In April of 2004, the Ministry of Tourism became the Ministry of Culture and Tourism, thereby marrying these two elements for greater cohesion and awareness of sustainable tourism among politicians (as was originally proposed in the 1989 Master Plan). In addition, there have been some encouraging measures to diversify the market as dive, conference and other types of tourism have increased. A heritage investment scheme named 'inHERIT Restoration' supported restoration initiatives in tourist historic cities (MTA Product Planning & Directorate Report, 2004) as well as cooperating with *Wirt Artna* (a Maltese NGO) and *Heritage Malta* to restore the War Museum and Saluting Battery and some temples and churches. In addition, four countryside walks in Malta and two in Gozo have been launched, and are being promoted in English and German. There were few programs implemented in mass tourism areas although a tourism zone support scheme was launched to focus on domestic waste collection, cleaning and street washing during the summer season. Beach replenishment at St. George's Bay and beach management practices were implemented at Golden Sands Bay – two popular mass tourism areas. These were aimed to reduce the density of users (67:33 ratio of tourists to Maltese during June to October – peak density 900-1,000 users). An eco-certification program has also been launched for hotels to raise awareness and reduce water, energy and waste. In addition, an EU funded programme called DELTA is being undertaken in the Cottonera area, in cooperation with the Ministry of Urban Development and Transport to transform the unique industrial heritage through a regeneration of crafts and waterfront. The Hypogeum, one of Malta's oldest archaeological sites, has been restored and entry has been limited based on carrying capacity. It must be noted, however, that this was not done by the tourism department but

by Heritage Malta with United Nations Educational, Scientific and Cultural Organization (UNESCO) funding.

Respondents were asked to identify what they believed had been the main problems or issues with implementation. Although respondents were also asked to identify specific barriers with regard to the six lines of action outlined in the policy for 2002-2004, the researcher felt it was important to identify if there were overriding issues with policy implementation in general from the Carrying Capacity study's inception in 2000.

Table 4: Main Barriers to Policy Implementation identified in Malta

Q: What were the main Issues/Barriers towards Successful Policy Implementation?					
Sector:	**Public**	**NGO**	**Private**	*Total*	*%*
Common themes (frequency of barriers mentioned)					
▪ Non-coordination between Ministries & Authorities– power struggles	7	3	4	*14*	*61*
▪ More talk than action: more just to gain votes	4	4	6	*14*	*61*
▪ Economic priority over social and environmental concerns	6	4	4	*14*	*61*
▪ Short term focus	6	4	3	*13*	*56*
▪ Private sector power: pressure on politicians for development	3	5	3	*11*	*48*
▪ Lack commitment to sustainability: tourism not seen as priority	7	2	2	*11*	*48*
▪ Lack of understanding/awareness of ST	5	3	2	*10*	*43*
▪ Lack of structure: no coherent strategic development plan	4	2	3	*9*	*39*
▪ Lack of stakeholder 'buy in' for ST	6		3	*9*	*39*
▪ Lack of integration into wider policy	7	1	1	*9*	*39*
▪ Focus on tourism numbers rather than yield	4	3	1	*8*	*35*
▪ Problems of insularity	2	2	3	*7*	*30*
▪ Ambiguity of policy	3	3		*6*	*27*
▪ Lack of participation by stakeholders	3		2	*5*	*22*
▪ Lack of resources	2	1	2	*5*	*22*
▪ Political clash between parties	3		1	*4*	*17*
▪ 'Creative arguments' to stakeholders to accept non-sustainable proposals	1		2	*3*	*13*
	n =12	*n =5*	*n =6*		*n=23*
Note: Respondents could list multiple barriers *(ST = Sustainable Tourism)*					

Table 4 outlines the key barriers identified by stakeholders with regard to the policy process overall. The most frequently cited perceived barriers or problems in achieving sustainability with the policy objectives were: the ascendancy of economic priorities (61%); the lack of coordination among Ministries and Authorities (61%); politicians doing more to obtain votes than implement actions (61%); a focus on the short term (56%); pressure on politicians (48%); and a lack of genuine commitment to sustainability (48%).

Economic Priority over Social and Environmental Concerns

One of the most common barriers to successfully implementing policy was economic priority over social and environmental concerns. This barrier is inextricably linked with political governance's short term focus and multiple other barriers arise out of this. Several respondents (43%) mentioned the short term focus on tourism numbers rather than yield (defined by respondents as revenue generated per tourist per day):

> "Malta is still using methods of marketing we know don't work, like advertising on London buses and cabs" (NGO interview #5).

Respondents also mentioned that there are no measures to ensure that sustainability efforts are enforced and there was a lack of focus on preservation and protection of the environment and more on increasing tourism numbers.

Lack of Coordination

Another frequent barrier brought up in the research was that although the ideas and processes for achieving sustainable tourism have been well laid out in multiple documents in Malta, a lack of communication within the MTA as well as power struggles and coordination with other authorities have hindered optimum outcomes (61%). For example, a common problem within the MTA is that the Marketing Directorate and Product Planning Directorate were often not working together and communication of initiatives was poor. This led to the lack of awareness in the marketing department about the more sustainable product which the Product Directorate was developing. This lack of communication and coordination within departments of the MTA, meant there was still too much focus on '3 S' tourism owing to fuzzy decision making and a Malta brand identity:

> "There is a lack of measurable objectives – day yield may be higher for shorter stays but we are not measuring this – we only measure the number of arrivals rather than the quality. Tourism is always measured in tourist numbers, not yield" (Private sector interview #1).

Although respondents agreed that civil society's understanding of the importance of tourism in Malta was a positive factor, short-term economic priority still trumps environmental or social, long-term concerns.

Private Sector Power / Pressure on Politicians

Power struggle among authorities and ministries for money and control which arises from poor coordination and lack of integrated government was also noted as a barrier. Pressure on politicians for unsustainable economic gains was mentioned and 'brown enveloping' (bribing or favours) was frequently also alleged. For example there was an attempt to provide a shuttle bus for cruise ships from the port to Valletta's gates but this initiative was blocked by outraged taxi drivers claiming they would lose business (private sector interview #2).

Everyone is seen to know, and to be known to, each other in Malta. As Boissevain & Theuma (1998:112) illustrate:

> "In a country as small as Malta, ties linking people to each other are frequent and unavoidable. We have already noted that the legal consultant of the Planning Authority was also the legal advisor to the Hilton project".

Often there is political back-scratching or 'brown enveloping' because developers and ministers come from the same rural town. As Richards (1982) outlines, there is often an overlapping of roles in small island economies. Not only are there fewer roles compared to larger societies, but fewer individuals to play these roles. As originally outlined by Benedict (1967), the sharing of roles and conflict of interest are especially prevalent in small societies where there are close kinship and personal ties. As a result, it is often difficult to achieve objective decision-making and to achieve efficient outcomes.

In addition, respondents felt that the private sector wielded too much power. It is known that there is already a surplus of beds, yet there are still more development projects slated. As one public sector interviewee explained:

> "Construction firms submit bids for 60% larger than what they want and then when there is an uprising, they concede and reduce by 60% and build what they originally wanted" (interview #6).

This issue was described as pressure of developers upon politicians as they often fund political parties and pressure politicians through their contribution to the economy.

Another type of pressure on politicians for development arises from the understanding of construction as synonymous with progress. For example, there is already a surplus of tourism beds in Malta; however, more development projects have been slated:

> "There is a lack of understanding about what sustainability is – MEPA resisted the golf course development for 15 years, but the Prime Minister overrode MEPA and now two sites are to be identified for development. There has never been a study done on the impact of golf courses – the same happened with casinos – everyone said it would attract tourists but out of the 3 we have now, 2 attract low-life locals, not tourists" (public sector interview #6).

Many respondents felt that the golf course development on the sister island of Gozo has gone ahead because this island wanted its fair share of 'development' and, being a swing seat in national politics (*more on this below*), this was too important to discard. Many issues of sustainability remain broadly out of favour with the electorate, and thereby politicians are hesitant to implement them for fear of losing votes. Still, although the carrying capacity study was commissioned in 1996-1998 by the Labour Government, it was completed under a Nationalist Government. This was a rare occasion when the two main political parties in Malta have visibly cooperated.

Lack of Commitment to Sustainability

The inefficient use of funds and the focus on tourism numbers (rather than net revenue per tourist) could also be attributed to the focus on the short term. The lack of commitment to, or recognized value of, the environment was also highlighted. Although some recycling efforts on Malta have been started, these are in their infancy and most waste is still sent to landfill sites. The word for rural space in Maltese translates into 'wasteland', and therefore development is seen as progress and contributing to a healthy economy:

> "The Minister for the Environment only has 23 officers to monitor the environment, which means only 8 are on duty at a time. It is not nearly enough to deal with prostitution, or gambling, let alone littering, or dumping. Even the Malta Hotels & Restaurants Association (MHRA) has complained about the litter and garbage. There is red tape and a lack of attention. Nature Trust [an NGO] has tried to introduce 'green wardens'; but the process was so long and bureaucratic. A constant stop-start process" (NGO interview #4).

Another factor relating to the lack of commitment to sustainability is the issue of improving quality. Although there was a previous policy to upgrade hotels to 4-5-star levels, many interviewees did not believe that having 5-star hotels necessarily meant a 5-star experience. They believed that attention to product had not been adequate, while there was too much attention on selling the 3 S's rather than Malta's unique product. This was forcing Malta into its predicament of being a cheap, low quality destination which was losing market share. It was argued that money to implement the policy measures was not being used effectively and that Lm150,000 had been spent on marketing sun, sea and sand, rather than Malta's niche and unique product:

> "There is a statement for planning of 15-16 more 4-5-star hotels; but when we have only 65% occupancy why is there a need for more hotels? Especially when 5-star hotels are lowering their price to keep themselves open?" (NGO interview #4).

This factor has also been observed on Cyprus since, despite a commitment to upscale tourism, that island state has still declared an intention to increase its tourist arrivals to 3.5 million by 2010 (CTO, 2000, in Ioannides & Holcomb, 2003).

There has also been a lack of focus on more sustainable forms of tourism products such as hiking and horseback riding as there is a lack of access to natural areas. For example, extensive bird hunting across Malta's cliffs and coastline inhibits their use for nature tourism purposes.

Political Party Clash

The Nationalist Party in Malta has historically been a middle-class party with middle-class values, while the Labour Party has broadly represented working class interests. Since 1966, no third political party has been successful in gaining representation in Parliament (Hirczy, 1995). As the Parliament has only two main parties and there are 13 districts which vote in 5 members each to Parliament, margins are often very close and favours are seen, or expected, to be granted in order to secure voter loyalty:

> "In 1996, a tourism policy was set out by Labour but because of time it wasn't passed. Then the Nationalist Party took power and passed exactly the same bill – Labour voted against it (even though it was the same bill) just because it was the opposing party. Gozo is one electorate and usually the swing seat, which is why so much development may have been taking place in Gozo as they are ignoring planning regulations and issues of sustainability for short term gains in Gozo and to swing votes" (private sector interview #6).

The quest for votes also causes impacts. "Decisions by politicians are more likely to be influenced by votes. As a result, politicians and officials might invest in prestigious projects, which are 'justified' by reference to their allegedly 'substantial' economic and social benefits; and the costs of such ventures are borne by the tax-payer" (Hartley & Hooper, 1992:23).

Inskeep (1991) declares that policies should be integrated with each other, based on recognition of the interdependence of such issues and policies as employment, tourism and transportation. In small island economies, however, while the feelings of community and collective identity are generally strengthened, when divisions do arise, they are often more intense due to the pervasive and emotional nature of relationships in a small society (Richards, 1982).

Lack of Structure / Clear Policy

One commonly noted barrier in all interviews was the MTA's lack of focus and direction. There has been an overriding concern outlining the need to attract quality tourists. However, more effort has gone into marketing to niche markets than developing the range and quality of the tourism product in Malta. Lack of continuity can be attributed to plans only covering a 2-year period, a clear lack of agreement about who should be implementing which initiatives, and the absence of clear benchmarks for measuring objectives for new diversification tactics (such as dive or heritage tourism).

Within the last few years, there have been many changes within the structure of how tourism is governed in Malta. The National Tourism Office of Malta (NTOM), which had been primarily focused on marketing, became the MTA in 2002. With MTA's creation, it also took over some responsibility for the environment and licensing. Many interviewees suggested that MTA did not have sufficient control over the environment such as litter and clean up, and often the lines have been unclear as to the respective responsibilities of MTA and MEPA. In addition, permits to upgrade or renovate property or other types of tourism permits are time consuming to obtain and often delayed unnecessarily. Many public sector employees at MTA suggested it had become like a state within a state. Many private, public and NGO interviewees pointed to a lack of focus as a key reason for the limited success of policy implementation.

Lack of Stakeholder Support and Participation

Lack of stakeholder participation was also mentioned by a large majority of both public and private sector respondents:

> "They [the MTA] say that stakeholders are involved by having the private sector sit on the board [of the Authority] but nothing that is said by those sitting on the board is done - stakeholders give advice but it is not carried out" (Private sector #1).

The public sector representatives mentioned that there was not enough thought towards sustainability forthcoming from the private sector.

Bureaucracy and the dynamics of public sector organizations give rise to situations where decisions are not always taken in the best interest of sustainability. People's egos, specific corporate agendas and power struggles are factors which have to be reckoned with:

> "Tourism sometimes gets a white card for everything, even above environmental protection" (NGO interview #4).

Malta's Policy: Standing Still or Moving Towards Sustainability?

Examining barriers to sustainability from a wider perspective and drawing from other literature in this field, suggests that there are 3 key causes for these barriers to implementation: an over-focus on rejuvenation and marketing, and a lack of political will.

Over-Focus on Rejuvenation

From a general environmental and often social perspective, there is no strong argument against making destinations more sustainable. However, rejuvenation (one of Butler's [1980] stages of the life cycle model referred to earlier) is often used interchangeably with sustainability, as many destinations see rejuvenation as a means towards renewed economic vigour. This can act as a stumbling block in the pursuit of balanced development (Ioannides, 2001). For example, just like many other Mediterranean destinations and island states or regions (such as Cyprus, Balearics, Canaries, Hawaii and the Caribbean), Malta

has resorted to developing golf courses or casinos as a new marketing technique to attract more tourists, even though the environmental and social consequences have known to be negative and often the developments have not brought in new visitors (Malta, for example, has more locals using its casinos than tourists). Rejuvenation tactics have also included traffic management projects, conservation projects and beach upgrades, as on Mallorca (Dodds, 2005; Hunter, 1995; Stabler & Goodall, 1997). Other locations have augmented their development strategies by implementing sustainable policy options in an effort to rejuvenate existing resorts and move towards more sustainable forms of tourism. Farsari & Prastacos (2003) note that every policy they examined in Mediterranean countries had the rejuvenation of the tourism product as its end goal. This begs the question asked earlier: were the implemented measures examples of risk aversion and competitive management techniques, rather than conscious and deliberate efforts towards heightened sustainability?

Malta has focused on attracting higher spending tourists and diversifying away from '3 S' tourism, not realising apparently that the majority of their tourists will still come for the sun, sea and sand and that the majority of their tourism infrastructure exists for mass tourists. Luxury resorts and golf courses can indeed attract higher spending tourists: however, they also consume more resources than traditional mass sun, sea and sand tourism, for which the infrastructure was already in place (Boissevain & Theuma, 1998:99). Efforts are needed to implement environmental and social measures particularly within those heavily built up resort areas and to address issues of quality, rather than focusing on new areas to develop and promote. The main core of Malta's policy has been rejuvenation and diversification efforts. The findings from Malta show a pattern similar to Cyprus's rejuvenations efforts (Ioannides, 1995) while Dodds (2007) notes a similar lack of planning for sustainability on Calviá, in the Balearics. As this island became more popular as a tourism destination, environmental degradation increased and only then were stricter development controls and regulations considered. As with Malta, rejuvenation efforts only came when visitor numbers declined and the local community became upset at the steadily increasing impact of tourists (Bramwell, 2003).

Over-Focus on Marketing

It seems as though many destinations have not addressed issues of sustainability until negative pressures have been felt. What is questionable, however, is whether sustainability efforts are then really addressed or whether another product is developed instead. Bianchi (2004) points out in his study of the Canary Islands that sustainable tourism and associated policies involve considering 'solutions' of destination rejuvenation such as resort upgrading, product innovation and diversification of markets; but these 'solutions' often precipitate the extension and deepening of capitalist production along the coast as well as expansion of tourism into rural and interior towns. Thus, he argues that the emphasis still lies on enhancing quality and improving competitiveness as ends in themselves. Although there have been a few initial steps in Malta to address issues of environmental degradation, efforts have been focused on attracting new market segments and on re-branding the island as something other than a '3 S' (sun, sea, sand) destination. Malta's most recent marketing focus has been on heritage tourism in an attempt to shift from the mainstream markets into another niche segment. As the '3 S' model declines, new markets and products (such as

dive tourism or ecotourism) are initiated and promoted. However, proactive planning and carrying capacity assessments for these areas are not usually adhered to, thereby creating a possible future duplication of existing sustainability issues and ignoring existing '3 S' problems that are not economically feasible to address.

Lack of Political Will

> "Despite the acceptance of sustainable tourism as a desired alternative to more predatory modes of development, a gap commonly exists between policy endorsement and policy implementation" Pigram (1990:2).

Pollacco (2003:20) refers to the 1967 Robens Report which states that "… the best of plans are of little use without an effective body with full authority and the backing of the Government to execute it". The main proposal of the Carrying Capacity Assessment (2001:31) was for a "growth management planning framework for managing tourism's growth and impacts". The local media in Malta reported that the MTA had "insufficient focus, lack of branding policy and inconsistency over time across markets" (Eber, 2004).

There have been a number of reports and plans about sustainable tourism and moving toward sustainable development in Malta. Yet, perhaps the problem of policy implementation is not so much one of awareness but of a lack of political will to entertain environmental and sustainable changes within the current tourism environment that are perceived as being vote losers. Politicians also operate within a 5-year (at best) planning cycle that is too short for effective, long-term planning.

The causes of tourism policy failure have been attributed to a variety of structural and institutional factors: an imbalance between a large-scale, consumption-driven international tourist economy imposed upon the fragile ecology of small island destinations; a preoccupation by policy makers with raising visitor numbers rather than yield; a mismatch of the economic benefits of tourism with non-linear socio-environmental costs; and the absence of a holistic measure of tourism impact, such as early warning signals to assess the approach to potentially dangerous socio-environmental thresholds (McElroy, 2002). Demands for improved tourism planning have been widely supported as key to achieving more sustainable tourism; however planning is rarely exclusively devoted to tourism *per se* but is instead a mix of the economic, social and environmental considerations that influence tourism development (Hall, 1994). Although often used as a tool to try to diversify and strengthen island economies, tourism often involves making decisions which negatively compromise social or scarce natural island resources (Gössling & Wall, 2007).

Conclusion

Environment and sustainability issues in Malta have gained awareness and inclusion in policy documents since the year 2000. However, few concrete measures have been achieved. Tourism is a fragmented industry dependant on other sectors and so it is the strength of these linkages which determines the success of tourism policy (Cooper, 1998). The Malta case supports Hunter's (1995) notion that a 'tourism centric' approach will fail:

tourism should rather be integrated into a wider pursuit of sustainable development. Such recognition requires the support and involvement of all stakeholders and politicians; while the general public needs to be informed about what sustainable development and sustainable tourism are about. The case for an integrated framework may appear relatively straightforward in principle; yet, social and environmental agendas are often played off against each other; the links (rather than tensions) between them are rarely made explicit.

In Malta, as elsewhere, good intentions are necessary but not sufficient. Absence of political will, lack of awareness of sustainable tourism, lack of stakeholder participation, policy ambiguity, partisan tensions, poor coordination and communication within the MTA and among Authorities and Ministries, and short term economic prioritization, have all been cited as factors leading to a failure to apply a sustainable tourism policy in Malta.

Why this lack of implementation? First, there is a lack of political will because changes are likely to be unpopular and could impact negatively on votes. Second, there is a lack of communication and cooperation amongst different sections of the public sector, leading to red tape, ineffectiveness and inefficiencies. Third, sustainability measures were misconstrued to try to upgrade the destination and regain market share rather than truly move towards attaining triple bottom line sustainability. Enlightened government requires finding a balance between social, environmental and economic issues, but there is no magic solution: compromise and balance may have to be sought. As Pollacco (2003:xiii) argues, tourism will only become and remain sustainable in the long term if it is developed in the national interest. While recognized as responsible for a hefty share of GDP, tourism policy is not a hot voting issue and so sustainability concerns for tourism are often bypassed in favour of job creation, health or education.

At the time of this study, there had been no evaluation of MTA's strategy as it relates to sustainable tourism. Almost all the interviewees agreed that social and environmental impacts were being felt and that stronger competition from other markets was affecting Malta's success as a tourism destination. All respondents opined that Malta's accession to the European Union (in May 2004) would impact on the initiation of implementation, noting that Malta was now 'on track' and would be obliged to start implementing sustainability policies. Time will tell if policy actions are executed to rejuvenate the current life-cycle or to actually work towards sustaining the industry as a whole.

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