

BARRIERS TO IMPLEMENTING SUSTAINABLE TOURISM POLICY IN MASS TOURISM DESTINATIONS

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The focus of this paper is on identifying the barriers to successful implementation of sustainable tourism policy. The research used exploratory and descriptive approaches to identify barriers from the literature as well as field research to determine perceived barriers from key respondents in two specific locations in the Mediterranean- Malta and Calviá. The research found that although respondents were aware of sustainable tourism, the individual advantage from exploiting shared pooled or shared resources is often perceived as being greater than the potential long-term shared losses that result from the deterioration of such resources, which means that there is little motivation for individual actors (whether governments, elected officials, or individual operators), to invest or engage in protection or conservation for more sustainable tourism.

Keywords: *barriers, sustainable tourism, policy implementation.*

INTRODUCTION

“Management decisions are not worth the paper they are written on unless the policies and decisions are implemented” (Elliot, 1997: 97).

Currently there is a great deal of research about tourism policy and a plethora of information on sustainable tourism, however research on the implementation of tourism policy in general is weak and of sustainable tourism policy is even slimmer. The past twenty years of tourism development have contributed many examples of unsustainable development and the general conclusion has been that appropriate policy



and its implementation are what are needed to make tourism more sustainable (Asher, 1984, Edgell, 1999). Even though tourism is important from an economic point of view, and a number of authors (Hall, 1994, Hall & Jenkins, 1995, Elliott, 1997, Caffyn & Jobbins, 2003) have investigated levels of power, control and ownership of tourism and how political systems have influenced decision making, tourism still remains relatively neglected as a major policy issue. There are, therefore, few studies of tourism policy implementation (Hall, 1994). Several authors (Jenkins, 1980, Richter, 1989, Younis, 1990, Choy, 1991, Dye, 1992, Johnson & Thomas, 1992, Hall, 1994, Gunn, 1994, Edgell, 1995, Hall & Jenkins, 1995, Elliot, 1997, Williams & Shaw, 1998) have noted their scepticism of government and the intended consequences and impact of government policies. Others (Hall, 1994, Inskip, 1991, Elliot, 1997) have provided case study examples of policy, however most of these showcase preliminary policies which have not been monitored or are examples of failure.

The evaluation of tourism policy is rare and recommendations to change or augment systems to make policies actually work and be more accountable are even rarer. Most studies of policy within the frame of tourism have been normative prescriptive studies of what governments should do rather than detailed examinations of what has happened and why. The majority of studies of tourism policy have been an analysis *for* policy rather than an analysis *of* policy (Edgell, 1991). This lack of research in tourism policy could be attributed to the lack of recognition of tourism in political agendas and the fact that the topic is multi-faceted and fragmented (Richter, 1989, Hall, 1994). (Hall, 1994) goes on to note that much of the current research on tourism policy has not explored the political dimensions of such policies from the point of view of tourism developments on the ground.

Research on this topic has three basic elements. First, there is a need to examine tourism policy and its implementation and show how this relates to the achievement of more sustainable tourism, a concept much discussed in tourism development today. Second is a need for outlining and understanding barriers to achieving successful policy implementation can provide important lesson for achieving success. Third, it is necessary to create a framework of how to achieve successful sustainable tourism policy implementation for managers, policy makers and other destinations in the future development of more sustainable tourism. This paper focuses on the second of the above points, and presents a review of the literature which is then cross referenced with results of two field studies conducted in Malta and Calviá , Spain.

COMMON RESOURCE USE: POLICY DEFINITION AND IMPLEMENTATION

Hardin (1968), in his classic article “The Tragedy of the Commons”, developed these ideas in the context of population growth and its effects on the earth’s resources. He related the Tragedy of the Commons theory to other environmental concerns, such as green/public space and pollution. Examples of over-exploitation of resources leading to a breakdown or collapse of a natural resource base and ecosystem reliance are often termed ‘tragedies’ (Brunckhorst & Coop, 2003). Since most users tend to behave in this manner, the resource is ultimately doomed as each person tends to follow their own best interest, often at the expense of society in general (Hardin, 1968). In the context of tourism, very few tourism destinations have established policies aimed at preventing overuse or overdevelopment, and those that have done so, have generally found that policy implementation has proven more difficult than policy creation.

A popular definition of public policy is that of Dye (1992: 2 in Hall, 2000) who declares it ‘is whatever governments chose to do or not do’. With regard to a destination, Goeldner, Ritchie & McIntosh, (2000) define policy as “a set of regulations, rules, guidelines, directives and development/promotion objectives and strategies that provide a framework within which the collective and individual decisions directly affecting tourism development and the daily activities within a destination are taken” (p. 1). This definition is used in the context of this paper. Implementation, it has been argued, (Inskip 1991) should be considered throughout the planning process and it is necessary to take into consideration what is realistic from multiple perspectives. Implementation of tourism policy has various difficulties such as the complex and different definitions of tourism, often unreliable tourism growth predictions and the short-term view of operators within the tourism industry. Who, if anyone, implements policy depends on market forces and also what type of government is in power. Smith (1973) suggests that it is the *context* within which such policies are to be implemented which is of fundamental importance. “Most good policy formulation requires considerable research and inputs from those who are implementing policy at the grass roots or impact level” (Elliot, 1997: 101). Contact and awareness are crucial for the efficient management of policy formation and implementation. This is especially true in tourism because of its diversity within the private and public sector.

On a prescriptive level, the implementation process normally involves:

- a plan review – the process to relay the necessary information to affected stakeholders
- adoption – formal and legal adoption of the plan to give it the force of law. This includes the adoption of zoning, land use and other legislation and regulations that need to be adopted in the area the plan will be implemented
- integration into public and private sector development, policies plans and programs (i.e. local environmental plans)
- continuous monitoring of visitor satisfaction, project development and marketing effectiveness
- adjustments to plans and programs
- periodic formal plan review and revision (Inskeep, 1991)

Crosby (1996) adds to this list with constituency building, resource accumulation and mobilisation of resources and actors, while others argue that implementation must have defensive or corrective actions to identify the conditions that need to be met for the policy to succeed (Walker, Rahman & Cave 2001). Confidence in a policy is important for its effective implantation and if the policy makers do not see a policy as strong and defensible, as well as capable of implementation, it is not likely to be supported (Pigram (1990).

Blake, Sinclair, & Sugiyarto (2002: 12) propose a practical approach to policy implementation arguing that before the implementation process is carried out, a series of questions need to be asked related to policy implementation, actions needed, and the presence of appropriate organisations to implement policy with suitable capabilities.

SUSTAINABLE TOURISM POLICIES AND IMPLEMENTATION

Multiple authors have examined sustainable tourism policies (see LA21, WCED Earth Summit held in Rio de Janeiro in 1992 as well as Beautmont, Pederson and Whitaker, 1993, WTO, 1998, Holden, 2003, UNEP/ICLEI, 2003). These agreements and declarations, despite being widely accepted by many governments and international bodies, have yielded few examples which show them being put into practice effectively, perhaps because the overall scope of sustainability must be dealt with on a smaller scale at a lower, more local level through the land use planning system or perhaps because, in reality, that there seems to be ‘no technical solution to the problem’ (Hardin, 1968: 1243).

One of the key issues inevitably resolves around who, or what level of decision-making should implement and control such policies. UNEP/ICLEI (2003) suggest that local authorities are the best placed agencies to manage tourism in a destination. Usually National Tourism Organisations (NTO) are responsible for policy advice and implementation and often unite policy and promotion (Hall, 1994). It is also these offices or administrations that manage and implement tourism responsibilities. Most provinces or territories have a tourism board or agency which is involved with both policy formulation and implementation. In addition, most cities or destinations also have a tourism organisation, but its role is usually that of a Destination Marketing Organisation (DMO) or Convention and Visitors Bureau (CVB), and it is not involved in policy even though it is the most 'grass roots' of the three dimensions. Lickorish (1991) and Krippendorf (1982) propose a more integrated role is needed for tourism policy, and other authors (Inskip, 1991, Eber, 1992, Krippendorf, 1982, Hall, 1994, Crosby, 1996, Vera & Rippin, 1996, Aynsley, 1997, Jackson & Morpeth, 1999, Briassoulis, 2002) also support the view that the key to successful policy implementation is more emphasis on local participation Pridham (1999) declares that there has been a problem with tourism as a policy priority for numerous reasons, including differences between member states and or ambiguity or irrelevance of higher level policies to local levels. For this reason, local involvement is fundamental to the planning and management of destinations (Coccosis, 1996, Meetham, 1998, Middleton & Hawkins, 1998, Ryan, 2002). Jackson and Morpeth (1999: 39) suggest the need for local involvement and that "local government needs to actualise the concept of community empowerment"). The focus of policies at the international and national levels will change as they are reinterpreted and implemented at a local level and each country or destination should establish an operational definition for sustainable development so a bottom-up and top-down consensus approach can be achieved. This paper now proceeds to examine problems with policy implementation in two field study areas and compares the results with barriers to implementation identified in the literature.

RESEARCH METHODOLOGY

The methodology entailed a multi-method research approach with a combination of both qualitative and quantitative research techniques including a literature review, a questionnaire survey and stakeholder interviews, as well as an in-depth examination of selected tourism policies

and literature about sustainable tourism case studies. The research engaged a triangulated approach to identify policy implementation barriers. Four groups were surveyed about their views and perspectives on barriers to implementing policy: 1) academics who had written about sustainable tourism policy, 2) government technical experts, 3) NGOs, and 4) private sector operators identified as the policy implementers in the two case studies.

The methodological process involved a review of the literature on general barriers to public policy as well as barriers to tourism policy in two particular destinations. The research focused particularly on coastal destinations and both background “grey” and academic literature was reviewed to identify possible barriers. The destinations examined included: Tenerife (McNutt & Oreja-Rodriguez, 1996) the Caribbean (Weaver, 2001, Wilkinson, 1997), Goa (Singh & Singh, 1999), Pattaya (Wong, 1998), Kuta (Wong, 1998), Cyprus (Godfrey, 1996, Ioannides, 1996, Sharpley, 2000), Turkey (Tosun, 2001), Tunisia (Poierer, 1995), and Torremolinos and Mallorca (Bruce & Cantalops, 1996, Vera & Rippin, 1996). In addition, a literature search of an additional 79 articles which referred to tourism policy barriers or sustainable tourism, was conducted. Sixty nine academics who had published on sustainable tourism in refereed journals were sent a questionnaire to ascertain that the barriers extracted from the literature were comprehensive (58% response rate). Once the preliminary research was completed, barriers identified were then examined in two destinations, Calviá (Spain) and Malta. Both locations are in the Mediterranean Basin and both have adopted sustainable tourism policies. Data was collected from 23 key respondents who were integral to the policy process in Calviá (92% response rate) and from 25 similar respondents in Malta (100% response rate). The results of the data were analyzed using comparative methods which allowed the authors to identify themes and conceptual categories to compare and contrast data and build upon existing knowledge currently in the field (see Dodds 2007a & b for more detailed information on the field research methodology).

BARRIERS TO POLICY IMPLEMENTATION

From the in-depth case study research in Malta and Calviá, Spain (see Dodds, 2007a & b for more detail), barriers were then cross-referenced with those identified from secondary sources to determine if similarities existed across this wide spectrum. The research found that the underlying framework of *The Tragedy of the Commons* (Hardin, 1968),

and that of the core principles of sustainable tourism, have been supported by these findings as many of the physical features on which tourism depends have been degraded beyond repair (Butler, 1991). Overall sustainable policy implementation faces problems from many barriers, including both private and public sector issues. Political power struggles and different values often exist within the policy process thus increasing the difficulties of implementing sustainable tourism policy. The literature reviewed demonstrates that power struggles arise in all areas and have impeded policy implementation in all facets of government and industry and across many other sectors as well as tourism. A number of themes can be identified in the literature, ranging from power clashes between political parties at a national level to lack of stakeholder involvement and accountability at the local level.

The barrier found most frequently was economic priority over social and environmental concerns. This barrier is related strongly to political governance's short term focus and many other barriers arise out of this. A focus on short term objectives creates a negative feedback loop with economic priority because with short political terms attention is focused on job creation and development for growth that should yield immediate results instead of an equal priority with environmental and social concerns. This harmful feedback loop is often perpetuated by political agendas being usually of a five-year duration whereas sustainability objectives often need considerations of 10+ years at least. A 4/5 year political term is simply not long enough to achieve sustainable tourism policy objectives. For example, in Calviá, restoring polluted or diminished ground water anything close to its original state is a long and expensive process and often benefits are not readily visible early, while costs are immediate and may be high for a number of years. The majority of initiatives which have been undertaken in destinations in Malta and Calviá have tended to be ones that were very visible to the community and to businesses, so that there were tangible examples of what had changed. The private sector mentality also feeds into this negative loop as its main considerations are most often focused on return on investment and the economic bottom line for understandable reasons.

Many destinations examined also showed past and future short term focus through their development patterns. Some destinations could be considered "copy-cat" destinations in that they developed new product offerings or exploited resources solely because their competitors had done so and they feared a loss of competitiveness. This approach has not changed since the tourism boom of the 1960/70's with continuous attempts to make the product competitive with that of other destinations.

Destinations justify this approach by pointing out that new development projects are vital to prevent a destination's decline and to maintain competitiveness, and favour this compared to the implementation of long term planning. As with the case of Malta and Calviá, though the idea of up-scaling tourism, destinations is appealing, destinations often only succeed in up-scaling the consumption patterns of their visitors. Water consumption by tourists is normally considerably higher than that of residents; a local consumes an average of 140 litres of water a day compared to average tourist consumption of 440 - 880 litres a day, (Boers & Bosch, 1994: 58). Malta had diversified into activities such as golf to attract more upscale tourists although the environmental impacts of such development can be considerable. It may be that concerned stakeholders are pacified by developers promoting their desire to plan using EIA, although whether the long term feasibility of these new developments has actually been evaluated critically or correctly is in question. Aspects of sustainability have been framed in a way that do not challenge the core pillars of free markets and profit-maximisation (Bianchi 2004).

Another aspect of a short term focus which was illustrated in Calviá and Malta and is supported by the literature (Godfrey 1996, Tosun 2001) is a fundamental flaw in tourism marketing. Most destinations focus on numbers of tourists rather than yield, and new products are introduced by a destination to promote itself. Measures of the effectiveness and success of tourism policies to date are invariably set according to the numbers of tourists that arrive at destinations or gross expenditure rather than the net benefits that tourism brings to a destination. This suggests that there needs to be a change in the role of governments from promotion to protection (Hall, 1994, Hall & Jenkins, 1995, Elliot, 1997), or at least to give a greater weight to protection. This focus is also a function of choice and markets. As argued by Hartley & Hooper (1992: 23), society sometimes accepts the outcome of private markets which, left to themselves, may fail to function properly because of externalities such as environmental effects. Conflicts in policy objectives often arise as job creation might harm the environment and society may have difficulty expressing its preferences. Election campaigns generally involve a complex system with multiple elements (e.g. taxation, services, health, defence, education.) which gives politicians considerable opportunity to interpret the 'public interest' (op cit: 24).

Another theme identified by the research is that the majority of frameworks for policy development are for new or developing destinations rather than for developed or mature destinations which was the case of these two case studies. There is often an assumption that

planning for tourism can incorporate issues of carrying capacity, social and cultural concerns and environmental issues, but those destinations which attract the greatest number of tourists are mass tourism mature destinations. Many of these may already receive excessive numbers of visitors, and sustainability is often viewed as a way to regenerate and rejuvenate stagnant or declining tourism numbers. In addition, carrying capacity, although a useful concept, is rarely achieved in the real world (McCool & Lime, 2001). Although it is often argued that sustainability measures are achieved at the local level (Sharpley, 2003, UN/ICLEI, 2003), at the local level in Calviá for example, many policy implementers believed that policy aims could not successfully be achieved without support and coordination from higher level governments. This research found that higher level support and acknowledgement was seen as imperative and many local government respondents and implementers of policy in Calviá thought that without national and regional support, policy plans could not be effective because sustainability extends beyond the local level. For example, economic growth and prosperity often hides growing social problems. In Calviá one problem that emerged was low education standards and high drop out rates from school, as the skill set needed for jobs in the mass tourism sector (waiting tables, housekeeping, bartending) is low. A mitigation strategy suggested to overcome this problem was to legislate professional standards for the tourism industry and have the private sector endorse them so as to raise quality of service, as well as the social/education status of the community living in tourism dependant areas, but this would involve higher levels of government. Transportation is another factor which is dependant on a wider territorial plan including such elements as public bus routes and trains. Working with other municipalities to make sure all public transport systems link together is essential and regional or national governments need to coordinate and oversee such a system. Although the literature suggests that local level policy implementation is more effective as local governments have more specific control over issues of sustainability within their areas, there is clearly a need to have an overarching framework and principles in place and operating effectively at an international or national level to provide guidance if local level policy implementation is to be successful. A potential explanation for the lack of integration of policy initiatives is that tourism is not regarded as important by many government sectors and there is a general lack of recognition of tourism on political agendas (Richter, 1989, Hall, 1994, Dodds 2007a & b). Even in locations like Malta, where tourism is regarded as important, lack of cross-sectoral integration of tourism is felt to be a problem.

A lack of coordination between government bodies has been noted by Lickorish (1991) and Singh & Singh (1999). Politics and programmes of different levels of governments are often poorly coordinated, and actions and policies of one level may contradict policies at another level, with little consultation between levels or departments. This was felt particularly strongly in Calviá, where 61% of respondents listed this as a barrier, and was also important in Malta, with over one third (35%) of respondents citing this factor as a problem in implementation of policy. The often expansionist economic interests of regional or national government can sometimes clash with local desires to limit tourism's impacts Williams & Shaw (1998).

Policies for sustainable tourism require close coordination with other sectors including taxation, transportation, housing, social development, environmental conservation and protection and resource management. Because often policy is subjected to change during implementation these other sectors need to be aware of each other and communicate their needs and concerns in order to achieve progress in policy implementation (Younis, 1990).

In the literature, participation by stakeholders such as the local community, private sector, NGOs and different levels of government is stated as imperative. NGOs are often excluded from policy development and implementation, possibly because they rarely have a primary economic interest and have tended to showcase environmental and social concerns. Din L'art Helwa and Nature Trust in Malta and Grup Balear d'Ornitologia i Defensa de la Naturalesa (GOB) and Friends of the Earth in Calviá have both raised awareness about the issue of sustainability and the environment and have pushed these considerations into the policy arena through the use of the media and promotional pieces to the public.

Another possible problem to local forms of sustainable policy being achieved is communitarian. Such characteristics represent a great difficulty as there is a clash between traditional economic development and the more sustainable path. In some cases such as public transportation initiatives, dominant social values turn out to be more resistant to change than anticipated. "This communitarian view suggests that what is good for the community in aggregate is not always the simple sum total of what is good for each of the individuals in that community" (Portney, 2003: 130). When little success is seen, interest tends to wane. As few politicians like to hold different views to their constituents, as long as people (political and business leaders as well as the general public) are willing to accept the status quo, little progress towards sustainability is possible. Portney, (2003: 128) notes that "The lack of political will to

pursue sustainability prevents all those professionals and technical experts from doing their part”.

Without a personal involvement and support for sustainable principles, effective policy formulation and implementation is unlikely to appear and change will not take place. This is summed up well by Parlato (2004):

“An altruistic attitude towards the environment, resulting in behavioural change, is more likely to occur if motivation to do so is on a personal and individual level, through one’s own beliefs and value system rather than if it were enforced legally or simply viewed as a social or political ideal” (p. 57).

Effective local consultation and cooperation is difficult to achieve, and tends to rely heavily on the power distribution arrangement in a community. Often it is argued that resort decline in coastal areas can be attributed to various factors such as surplus bed capacity, diminishing market share and volume of domestic holiday makers, competition from other destinations, reduction of average spend per tourist head and declining profit margins (Agarwal, 2002: 31). While these authors do not dispute these arguments, it should be noted that a strong sense of individualism can also be to blame. Case studies of Goa, Turkey, Calviá, and Malta (Singh & Singh, 1999; Tosun, 2001, as well as this research) support the conceptual framework of this paper by illustrating the validity of the Tragedy of the Commons concept (Healy 1994). The protection of common resources such as beaches, oceans, water supply and undeveloped land will never be fully achieved because “the problem is that there is usually no incentive for individuals, acting purely in pursuit of the short-term, self interested bargain to use less air or water. To the contrary, in the absence of aggressive regulation, the incentives usually motivate the depletion of such common goods” (Portney, 2003: 135). The Tragedy of the Commons is a system-level consequence of individual-level attitude, values and behaviour. This Tragedy of the Commons or ‘rampant individualism’ is where individuals are free to act on what they believe to be their own immediate self interest – essentially a mismatch between what is good for society or the community and what individual people think is good for them personally.

Although the literature (e.g. Butler 1999) suggests that one problem with sustainability is that it is hard to define, leading to an overall lack of awareness and understanding of sustainable tourism, the results of this research do not support this view. All interviewees claimed to have had a clear understanding of what was meant by sustainability, as was demonstrated in both destinations. However, it is possible that those who

influence policy have a poor understanding of why sustainability is needed or fail to support all aspects of the triple bottom line. In addition, the general public and voting population may not look beyond the immediate future. Society in a particular area (in a democratic system) usually expresses its preference for environmental and social issues through voting, however in both local and national elections, tourism is only one, usually a minor, aspect in the voting system when compared to taxation, health care, security and job creation, if it is targeted at all. In Calviá, the carbon tax showed that tourism can become an issue in some cases and can affect governmental control if interested parties show concern (Cantallops, 2004). One might argue that while there is some confusion over sustainability in the context of tourism, there is even less appreciation of the overall importance of the concept at large.

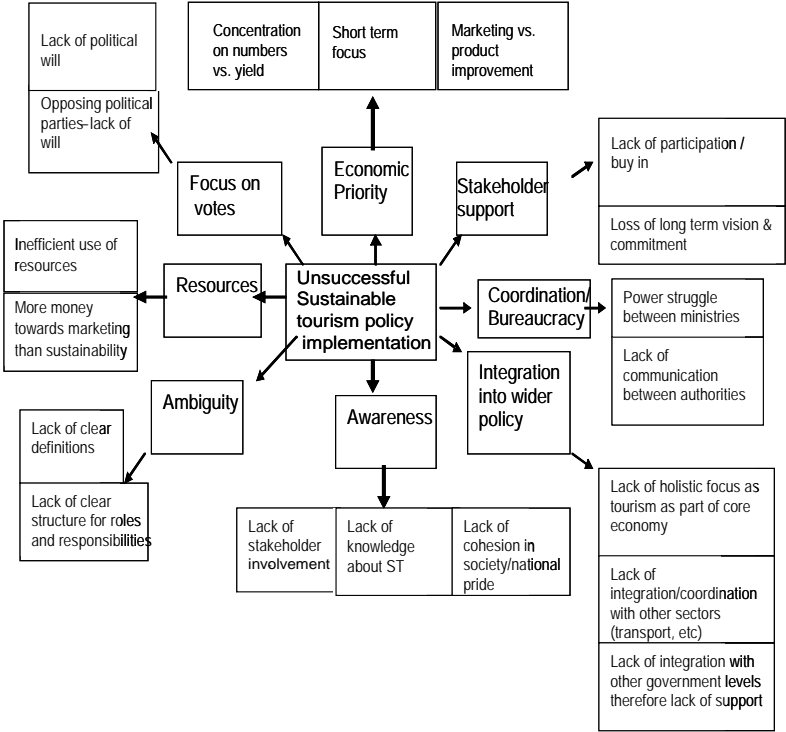
SUMMATION

Figure 1 contains the research findings in terms of identifying issues of policy implementation. The various elements which were considered to hinder or block successful sustainable tourism policy implementation are displayed. The eight inner boxes represent an aggregation of the impediments to successful implementation while the outer boxes provide examples to explain the barriers. It can be concluded that there is often more than one barrier to implementation and that many factors overlap or influence each other.

Policy problems are noted by Hall (1994), who states that policy is essentially about power. “Tourism development is not created exclusively by private commercial enterprise, but an adversarial attitude often inhibits tourism progress” (Gunn, 1994:435). Different stakeholders have different agendas and there is often a dis-connect between ideal policy goals and achievable outcomes. In addition, the local communities who vote political parties into power are also partly responsible for power struggles over sustainability. Demands for improved planning for tourism have been widely supported as crucial; however planning is rarely exclusively devoted to tourism *per se* but instead is a mix of economic, social and environmental considerations which reflect all factors that influence tourism development (Hall, 1994). In addition, in many destinations such as Calviá and Malta, much of the development took place before sustainability was considered important and it must not be forgotten that often sustainability means working with what exists to improve it rather than starting with a blank slate. Tourism is a complex system with multiple stakeholders as well as value systems which need to

be considered. Stated succinctly, sustainability has questioned the “assumption of a continuous, linear and more or less harmonious development for societies along a given track” (Becker et al., 1997 in Pollacco, 2003: 359). Power is the underlying element of politics and this discussion reviews specific details to try to clarify issues resulting from this state of affairs.

Figure 1: Barriers to achieving successful sustainable tourism policy



CONCLUSION: MOVING FROM POLICY TO MANAGEMENT

The process of policy and planning is never ending, as any decision or action usually needs further approval and implementation, however, it can be concluded that the push for economic growth resulting in economic factors having priority over social and environmental concerns is the major causal factor affecting policy non-implementation. This barrier has been identified by many writers (Fayos-Sola, 1996, Elliot,

1997, Hashimoto, 1999, Bianchi, 2004) and was the principal barrier identified from the field research.

The principles of sustainability were endorsed and adapted in the study areas and were seen as the best way forward for all sectors (economic, social and environmental), however the execution of sustainability initiatives proved difficult and many goals were not reached despite the impacts of existing forms of tourism being clear. One can argue, therefore, that the problem with achieving sustainability lies in implementation rather than definition. It may be that policy-makers believe that achieving sustainable tourism development requires little more than a shift away from the traditional 3 S (sun, sea, sand) mode of tourism towards a niche product focus and quality initiatives to attract a higher yield tourist. However, the problem is more fundamental than that. "If moves toward a sustainable tourism development pattern are to be successful, attention will need to be paid to institution building in the spheres of policy management and implementation" (de Kadt, 1992: 66).

The difficulty in successfully implementing policy is not technical, but is far broader and involves political, cultural, economic, social and psychological change. Various theories including collective action, regime and adaptive management have been put forward in conjunction with long term and holistic thinking as essential steps to overcome the barriers identified. Tourism policy is complex because of its inevitable links with other topics and jurisdictions. Decision makers in control of tourism and tourist destinations have to not only "talk the talk" in creating policy but also to "walk the walk" by implementing their policies in order to achieve sustainable tourism goals and the evidence suggests that this is a much harder but ultimately necessary task.

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