

Agenda – Economy, Trade, and Rural Affairs Committee

Meeting Venue:

Committee room 3 – Senedd
and video conference via Zoom

Meeting date: 20 November 2025

Meeting time: 09.30

For further information contact:

Robert Donovan

Committee Clerk

0300 200 6565

SeneddEconomy@senedd.wales

Hybrid

Private pre-meeting

09.15 – 09.30

Public session

09.30 – 11.55

1 Introductions, apologies, substitutions, and declarations of interest

09.30

2 Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill: Evidence Session 7

09.30 – 10.45

(Pages 1 – 38)

Barbara Griffiths, North Wales Holiday Cottages

Lisa Stopher, Managing Director, West Wales Holiday Cottages

Carl Thomson, Public Policy Manager (UK), Airbnb

Fiona MacConnacher, Head of Public Affairs UK and Ireland, Booking.com

Attached Documents:

Research brief

Evidence paper – Airbnb

Evidence paper – Booking.com



Break

10.45 – 10.55

3 Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill: Evidence Session 8

10.55 – 11.55

(Pages 39 – 54)

Emma Thornton, Chief Executive, Visit Pembrokeshire

Nicky Williamson, UK Director for Wales, Professional Association of Self-Caterers UK

Zoë Hawkins, Chief Executive, MWT Cymru (Mid Wales Tourism)

Attached Documents:

Evidence paper – Mid Wales Tourism (MWT Cymru)

Evidence paper – Visit Pembrokeshire

Evidence paper – Professional Association of Self-Caterers UK

4 Papers to note

11.55

4.1 Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill: written evidence

(Pages 55 – 76)

Attached Documents:

Letter from the Chair to Mid and West Wales, South Wales, and North Wales Fire & Rescue Services – 4 November 2025

Response from South Wales Fire & Rescue Service – 14 November 2025

Response from Mid & West Wales Fire & Rescue Service – 14 November 2025

Letter from the Chair to Propertymark – 4 November 2025

Response from Propertymark – 14 November 2025

Additional written evidence – Association of Scotland's Self-Caterers (ASSC) and the Scottish Tourism Alliance (STA) – 12 November 2025

4.2 Welsh Government's consultation: proposals for a new Local Growth Fund in Wales

(Pages 77 – 78)

Attached Documents:

Letter from the Cabinet Secretary for Economy, Energy and Planning – 7 November 2025

4.3 Invitation to give oral evidence to the Committee on the developments in the Welsh steel industry

(Pages 79 – 80)

Attached Documents:

Letter from the Chair to the Secretary of State for Business and Trade – 10 November 2025

4.4 Future of Welsh steel: Transition Board

(Page 81)

Attached Documents:

Letter from the Cabinet Secretary for Economy, Energy and Planning – 10 November 2025

4.5 Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill: Follow-up information from the meeting held on 5 November 2025

(Pages 82 – 83)

Attached Documents:

Letter from the Welsh Revenue Authority – 11 November 2025

4.6 Biocidal Products (Data Protection Periods) (Amendment) Regulations 2025

(Pages 84 – 85)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs – 11 November 2025

4.7 UK–India Comprehensive Economic and Trade Agreement (CETA)

(Pages 86 – 87)

Attached Documents:

Letter from the Cabinet Secretary for Economy, Energy and Planning – 11 November 2025

4.8 Inter–Institutional Relations Agreement

(Page 88)

Attached Documents:

Independent Intergovernmental Relations (IGR) Annual Reports – Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to the Chair of the Legislation, Justice and Constitution Committee – 11 November 2025

4.9 Development of Tourism and Regulation of Visitor Accommodation (Wales)

Bill: Follow-up from the Legislation, Justice and Constitution Committee meeting held on 10 November 2025

(Pages 89 – 92)

Attached Documents:

Letter from the Chair of the Legislation, Justice and Constitution Committee to the Cabinet Secretary for Finance and Welsh Language – 12 November 2025

**4.10 Business Committee review of the Public Bill and Member Bill processes:
publication of pre-introduction Bills**

(Pages 93 – 94)

Attached Documents:

Letter from the Chair to the Llywydd, and Chair of the Business Committee –
14 November 2025

4.11 Banning peat compost

(Pages 95 – 96)

Attached Documents:

Letter from the Chair to Chair of the Environment, Food and Rural Affairs
Committee, UK Parliament – 17 November 2025

4.12 EU–MERCOSUR Free Trade Agreement

(Pages 97 – 98)

Attached Documents:

Letter from the Chair to the Cabinet Secretary for Economy, Energy and
Planning – 17 November 2025

**5 Motion under Standing Order 17.42(vi) to resolve to exclude the
public from items 6, 7, 8 and 10 of today's meeting**

11.55

Private session

11.55 – 12.15

**6 Development of Tourism and Regulation of Visitor
Accommodation (Wales) Bill: Consideration of evidence**

11.55 – 12.15

7 Forward Work Programme Discussion

12.15 – 12.20

(To Follow)

Attached Documents:

Discussion paper

Local Growth Fund scoping paper

Lunch break

12.20 – 13.15

8 Private pre-meet ahead of item 9

13.15 – 13.45

Public session

13.45 – 15.15

9 Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill: Evidence Session 9 – Final Scrutiny of the Cabinet Secretary for Finance and Welsh Language

13.45 – 15.15

The Rt. Hon. Mark Drakeford MS, Cabinet Secretary for Finance and Welsh Language, Welsh Government

Helen John, Deputy Director, Licensing of Visitor Accommodation, Welsh Government

Robbie Thomas, Head of Licensing of Visitor Accommodation, Welsh Government

Dylan Hughes, First Legislative Counsel, Welsh Government

Emma Anderson, Lawyer, Welsh Government

Private session

15.15 – 16.00

10 Development of Tourism and Regulation of Visitor

Accommodation (Wales) Bill: Consideration of evidence and key issues

15.15 – 16.00

Agenda Item 2

Document is Restricted

**Written Evidence, submitted via MS Forms Committee Consultation – 17
November 2025**

From Carl Thomson, Public Policy Manager (UK) – Airbnb

What are your views on the general principles of the Bill, and whether there is a need for legislation to deliver the stated policy intention?

Short-term lets are essential for tourism in Wales. In 2024, Airbnb facilitated more than 1.6 million nights booked and 490,000 inbound trips, contributing £345 million to the Welsh economy and supporting 5,336 jobs.

The typical Airbnb host shares just one listing for 31 nights a year and earns around £6,000 annually. Two thirds of our Welsh hosts are women. Many are retired or can no longer work. Four in ten of our UK hosts say the money they earn helps them afford to stay in their homes.

The vast majority of Airbnb guests enjoy a safe, positive experience. Negative incidents are extremely rare, with an average satisfaction rating of 4.9 stars out of 5 for trips to Wales. Our internal data shows that accommodation in Wales hosted on our platform enjoys a stronger safety record compared to other parts of the UK and across EMEA, both of which already have very high standards. Of the trips completed between January 2024 and October 2025, just 39 checkouts had a safety incident reported, equating to 0.004%. During this time, Wales had proportionally 40% fewer safety reports than average for the EMEA region, with no carbon monoxide incidents, no fire hazard reports, no electrical safety reports, and only a single reported gas incident.

Against this backdrop, licensing to regulate health and safety is a blunt and unnecessary tool that is grossly disproportionate to the potential risks faced by guests. There is no evidence that there are issues around the quality or safety of visitor accommodation in Wales that require the imposition of a bureaucratic licensing scheme. The scheme's requirements will impose disproportionate burdens on visitor accommodation providers (VAPs), particularly casual or occasional Airbnb hosts who top up their income by renting their property for a few nights a month, and act as a powerful disincentive for those who are keen to make an economic and social contribution to Welsh tourism.

A licensing scheme is also not needed given the intention to introduce registration on all overnight accommodation in Wales. A registration system will tackle some of the most important problems facing the sector, which is a lack of data on the number, type and concentration of short-term lets. Registration will allow VAPs to be signposted to information about existing health and safety obligations and attest

that they follow them. Data gathered from the scheme can be used by local authorities when investigating complaints and as part of an intelligence and evidence-led approach to enforcement. All this can be achieved without the cost and friction that licensing entails.

We strongly suggest that the Welsh Government withdraw this bill, particularly given the extremely limited timeframe that remains for proper scrutiny. Instead, they should wait until the registration system has been fully implemented, and use data from the scheme to inform whether there is evidence that supports further regulation of the sector. It is not appropriate to enact this bill without taking these steps.

What are your views on the Bill's provisions, including whether they are workable and will deliver the stated policy intention?

The bill will create a licensing framework that is unnecessary and bureaucratic for hosts, while not achieving its stated intention.

Of particular concern is the shift (without meaningful consultation) from the 2023 proposals for instantaneous granting of a licence and registration number following upload of relevant health and safety documentation, and its replacement with an "apply and wait" model whereby every application and supporting documentation is manually checked. This is an outdated framework which does not reflect learnings from other jurisdictions, such as in Scotland where operators have faced waits of many months (and in some cases, up to a year) for a decision, leaving their businesses in limbo. Although we note comments from officials that AI could expedite the approval process, we have not seen any credible explanation of how this could work in practice.

We recommend that the Welsh Government adopt a more modern and frictionless approach whereby an accommodation provider is granted an automatic licence number on submission of the application with the required documents. This is an example of best practice internationally and is used in countries like France, Germany, Hungary and Greece. Automatic approval can be followed by random inspections or a risk-based approach to checks, and a right to rectify any mistakes before a licence is withdrawn.

The proposals in the bill to require annual renewal of licences is also problematic, considering that many visitors book stays months or more than a year in advance. It will create ongoing uncertainty for VAPs about whether they will be able to continue operating or honour future bookings, and place an additional administrative workload on them to re-apply on a yearly basis. Where annual licence renewals have been introduced, the licence validity period has often been extended for these reasons. Edinburgh recently amended its policy to allow for three-year licences rather than single-year ones after incurring similar issues. Annual renewal would make

Wales an outlier in the UK and internationally. Should the Welsh Government proceed with this legislation, we suggest that it considers a longer length of licences, with three to five years being more appropriate.

The impact of annual renewals must also be seen in the context of a large number of regulatory interventions on short-term let hosts (who are mostly individual operators or small or micro businesses) in recent years, including registration, a requirement to collect and remit visitor levies, planning permission where Article 4 directions are introduced, potential new minimal energy efficiency standards, council tax premiums and increased business rates thresholds. All these have been introduced in close proximity to each other, without any consideration of the cumulative impact. The costs, time and administration required from all this risk being passed on to guests through higher prices, potentially making Wales a less competitive and attractive destination for domestic and international guests. For these reasons, we recommend that this bill is withdrawn until the registration scheme has been fully implemented, and a full analysis has been carried out into the health of the sector.

In your view, are there any potential barriers to the implementation of the Bill's provisions?

We have extremely serious concerns about how the Welsh Government envisages the role of booking platforms and intermediaries when it comes to enforcement.

Under sections 46 and 47, the bill would make platforms (and their senior officers) liable for a VAP's failure to display an accurate registration number, to link to the visitor accommodation directory, and any other display requirements on their accommodation listing "in a form specified by Welsh ministers". These proposals were communicated to us at an extremely late stage (one week before introduction of the bill to the Senedd), with no prior consultation or discussion.

Platforms do not have the ability to determine whether a registration number inputted by an VAP is correct. While we note comments from the WRA that the register will be public and platforms could check whether the number on a listing matches the details on the registration scheme, they do not appear to be familiar with the significant technical and resource difficulties involved in implementing this, which could have been highlighted had they requested input from us before publication of the bill.

The suggestion that platforms could validate registration numbers through API integration with the registration scheme (which has been informally put to us) would create significant difficulties for applicants, and be disproportionately burdensome and costly for both booking intermediaries, smaller VAPs who take direct bookings

online, and the WRA (such a system requires hundreds of thousands of pounds annually to maintain on both sides). We would be happy to write to the Committee with more detail on why this proposal is technically unfeasible. We note the Welsh Government has previously accepted these arguments in earlier discussions with us around implementation of the registration scheme.

Imposing criminal liability on platforms and their officers, and introducing monitoring obligations is out of keeping with established practice in other jurisdictions which have introduced short-term lets regulation, including the Scottish licensing regime, the forthcoming registration scheme in England, and the EU STR Regulation. It is incompatible with well-established legal concepts around intermediary liability, which is fundamental to the effective functioning of digital markets and provides platforms with protections against general monitoring obligations.

We believe this can be rectified by amending the bill to ensure that liability for providing the correct information rests solely with the VAP. Criminal liability should sit only with those who have knowledge of the registration status of a particular premises and control over that property. Platforms can support by ensuring every in-scope listing on their platforms displays a registration number in a set format, to be agreed in consultation with the WRA.

While we oppose the bill overall, these changes would bring it more closely in line with international best practice, align with the approach anticipated for the registration scheme and with that taken in other jurisdictions, and avoid a situation whereby booking platforms are held criminally liable for activity under which they have no control. Without this, the bill could face legal challenges at an early stage.

Do you feel there will be any unintended consequences arising from the Bill?

We are concerned at suggestions from some MSs that the scheme should be made even more restrictive than currently proposed, such as withdrawing licences due to complaints about parking, or requiring the approval of neighbours before granting a licence. Where jurisdictions have imposed overly restrictive licensing conditions that add friction, cost, uncertainty and complexity for hosts, and subjective reasons for rejecting applications, the impact is invariably a loss of accommodation supply, the growth of an unregulated black market that operates off-platform, a less competitive market, a loss of tax revenue for the local economy and higher prices for guests.

The impact of licensing on the tourism economy can vary greatly based on the type

and method of the scheme and how quick and easy it is to gain approval. We acknowledge some positive design aspects of the scheme that reflect learnings from mistakes in Scotland, such as a single, national set of rules, limiting the requirements to obtain a licence to steps which are already legal obligations, no variation between local authorities, and no ability to reject applications on speculative grounds. We also believe it is correct to exempt "spare rooms" and hosting in a primary residence, since these are very different types of accommodation experiences to hotels and stays in dedicated self-catering accommodation.

However, our initial and informal estimate at this stage suggests that the introduction of the kind of licensing framework envisaged in the bill could cost ordinary, everyday Welsh hosts between £4.5m to £15m in reduced income. Costs for the wider Welsh economy and hospitality sector are likely to be much higher and the potential harm to the Welsh tourism economy is at this stage immeasurable. We would draw attention to the experience in Scotland, where BiGGAR Economics has estimated a £57 million potential GVA loss in Edinburgh per 0.5% reduction in secondary short-term lets, with a broader national risk of £864 million to baseline GVA.

Finally, a consequence of targeting short-term lets in this way (increasing the difficulty of doing business, and adding extra administrative workloads, ultimately reducing supply and raising costs for visitors), will be to make hotels a more attractive option for travellers to Wales, meaning that it is large and international hotel chains who will most benefit from guest spending on accommodation, rather than smaller VAPs and local short-term let hosts where the money would stay in local communities.

What are your views on the Welsh Government's assessment of the financial and other impacts of the Bill as set out in Part 2 of the Explanatory Memorandum?

We do not believe the impacts of the bill are properly captured in the explanatory memorandum.

The memorandum presents assumptions as fact, and makes bold statements to justify the need for licensing in Wales without providing data to back these up. For example, it states that residential landlords are switching to short-term lets because it is "easier". In fact, running a self-catering business is a very different activity to the private rented sector, with the need to manage multiple changeovers a week, regular cleaning, more competitive marketing and dependence on tourist flows and the attractiveness of the local area for guests.

Likewise, the memorandum says that there is “anecdotal evidence” that some short-term lets are not meeting existing regulatory obligations. This is a weak foundation to build the case for licensing. We have not seen any credible research and evidence which demonstrates that licensing is needed to ensure health and safety in the sector. Our own data suggests the opposite.

The memorandum acknowledges that it is difficult to quantify the number of short-term lets and their role and impact on the tourism economy due to the lack of data. This reinforces our suggestion that the bill should be withdrawn, to allow evidence from the registration system to be utilised and inform any next steps around future regulation.

The memorandum also does not sufficiently capture the impact of the pivot towards an “apply and wait” form of licensing. The need to process tens of thousands of applications annually, with the review of hundreds of thousands of documents, is likely to impose a huge resource and administrative burden on the WRA, leading to delays for VAPs in securing their licence. This was seen in Scotland, where 11% of applicants were still pending determination 15-18 months after they were first submitted. The potential for business disruption and uncertainty for VAPs is significant, especially as the memorandum does not appear to set out any expectations on how long it will take for the scheme operator to process each application. Rent Smart Wales claims licences take up to eight weeks to determine, despite the fact that these applications are far less onerous than those proposed in this bill, with no document uploads, licences being valid for five years, and a far smaller number to process each year. It feels inconceivable that short-term let licences could be processed more quickly.

In addition, we question whether the average application fee of £75 per annum suggested in the memorandum is realistic. The fee for Rent Smart Wales is £254, despite being a simpler regime. Early estimates of licence fees made by the Scottish Government in 2021 suggested fees between £214 and £436. In reality, application fees in Edinburgh range from £653 and can reach up to £6,000 (the latter of which would wipe out the entire average earnings of a typical Airbnb host). As such, the bill appears to be proceeding on a false basis and we encourage the Committee to scrutinise this aspect in more detail.

What are your views on the appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Part 1: Chapter 5 of the Explanatory Memorandum)?

The bill as drafted gives the Welsh Government too much discretionary power to alter or vary the scope of the scheme. For example, it gives wide powers to ministers to expand the scope of licensing to other accommodation types beyond those set out under section 5, to change requirements around public liability insurance, and to create additional conditions of obtaining a licence, including new obligations which are not currently legal requirements of operating a short-term let.

We are also concerned that giving ministers the discretionary power to require "training" as a condition of obtaining a licence is both unnecessary, and risks creating a much slower, bureaucratic and convoluted process than originally envisaged. There is no evidence that requiring mandatory training as a condition of holding a licence is needed, particularly given the already safe and high quality of accommodation in Wales which we have demonstrated in answer to previous questions. Completion of a training course (particularly one which is not yet defined) as a condition of issuing a licence would create a significant barrier, especially for casual or occasional Airbnb hosts, and reduce the ability of local authorities in Wales to quickly scale up provision to support major events or seasonal changes in demand for accommodation, all without achieving the stated intention of improving the safety of guest stays..

We therefore believe these clauses in the bill should be removed. Signposting VAPs to guidance about their obligations and sources of information and promoting a clear code of practice should be sufficient. At an absolute minimum, the ability of ministers to use these powers should be clarified so that no substantive changes to the requirements of obtaining a licence can be made except through subordinate legislation and only after first publishing a robust evidence base and undertaking public consultation.

Finally, the requirement on booking intermediaries to "include advice on how to access information regarding the premises on the visitor accommodation directory" is problematic, and we would welcome further clarity about what this would mean in practice, considering this would require product changes to global platforms. We question whether this is necessary, since a registration number would be clearly displayed anyway, and therefore indicate that a registration scheme is in place which a guest could look up if they were concerned or interested. We would highlight that, like the proposals around liability on platforms for the accuracy of registration numbers, no conversations took place about the feasibility, possibility or practicality of this requirement before the bill was published. Again, the powers that would be granted through this clause should only be enacted following proper consultation and communication with the platforms who will be affected.

Are there any other issues you would like to raise about the Bill and the Explanatory Memorandum or any related matters?

Yes. We are strongly concerned about the accelerated timeline for passage of the bill, and the far more limited period for parliamentary scrutiny that it has been allocated compared to equivalent legislation. The Visitor Accommodation Regulation Bill, which establishes the registration scheme that will underpin the proposed licensing framework, was introduced on 25th November 2024 and spent 126 days in stage one proceedings. This was similar to the timeline given for consideration of other bills this session (for example, the Public Transport Bill spent 169 days and the Disused Mine and Quarry Tips Bill had 141 days in stage one). We understand the intention is for this bill to conclude stage one consideration by the end of December, meaning that it would have received fewer than 60 days of consideration by this Committee, less than half the time given to other bills.

Given the intention of Welsh Government officials to pass the legislation before next year's Senedd elections, this would allow a maximum of 157 days scrutiny for the bill (including the Christmas and Easter recess) before the pre-election recess on 8th April. This is almost half the 297 days between the Visitor Accommodation Regulation Bill being introduced and receiving royal assent, and substantially less than the 357 days that the Welsh Language and Education Bill spent in the Senedd.

Another illustration of this is that turnaround for written evidence on the bill has been extremely short (for example, the stage one consultation on the Visitor Accommodation Bill opened on 25th November 2024 and accepted submissions until 10th January 2025, giving 47 days to respond. This current exercise opened on 3rd November, with a submission deadline of 17th November giving just 15 days to reply on proposals that are far more consequential than the earlier legislation.

These timelines feel excessively rushed, particularly given that the bill will introduce major legal obligations on VAPs, create a new framework which may restrict their ability to continue operating, impose criminal penalties for non-compliance, and apply a new regime on online platforms for enforcement that is out of keeping with international legal principles.

The impact on scrutiny is more important given that Welsh Government officials appear to be relying on the Senedd to address some of the open questions and the uncertainties and unresolved issues stemming from loose drafting of the bill. One example of this is that when we raised serious issues about the feasibility and practicality of the WRA's suggestions around how platforms might confirm the validity of registration numbers, we were simply told that we should "take it to the

Senedd”.

We again reiterate our strong recommendation that this bill should be withdrawn until the registration scheme is fully implemented, following which it should only be brought back following robust consultation and clear, reliable and unambiguous evidence that licensing is needed to ensure the safety and quality of short-term let accommodation in Wales.

Agenda Item 3

Written Evidence Submission to the Senedd Cymru Tourism Committee

From: Mid Wales Tourism (MWT Cymru)

Date: 7th Nov 2025

Subject: Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill

Executive Summary

Mid Wales Tourism (MWT Cymru) welcomes the principle of introducing a registration and licensing scheme for visitor accommodation in Wales. As a regional Destination Management Organisation (DMO) representing over 600 tourism businesses, we have long supported the goal of achieving a fair, transparent, and safe accommodation sector.

However, while we support the *intent* of the Bill, we have major concerns about its *practical implementation*. The definitions, data requirements, and system architecture as proposed could unintentionally impose significant administrative and financial burdens on businesses and not-for-profit DMOs. If not implemented carefully, this could disrupt destination marketing, reduce visibility for Welsh businesses, and undermine the regional tourism economy.

We outline below our areas of support, detailed concerns, and key recommendations for the Committee and Welsh Government.

1. Support in Principle

- **Level Playing Field:** The tourism sector in Wales has long supported fair licensing to ensure safety, transparency, and consistency across all providers.
 - **Consumer Confidence:** A registration scheme can strengthen visitor trust, providing reassurance that Welsh accommodation meets expected standards.
 - **Centralised Oversight:** We support a national framework rather than fragmented local schemes. A unified approach ensures fairness and coherence across Wales.
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2. Key Concerns

2.1 Definition of “Premises” and Mixed-Use Sites

- The Bill’s wording allows multiple licences for the same or part of the same premises. This could mean each *unit* on a holiday park or serviced apartment complex requires its own licence.

- For mixed-use sites or large operators, this would result in substantial costs and administrative duplication.
- Clarification is needed to allow *single applications with multiple units listed* where safety and compliance documentation is shared.

2.2 Fee Structure and Cost Burden

- Although licence fees are not specified in the Bill and will be set by regulation, the suggestion of £75 per unit (Explanatory Memorandum / Regulatory Impact Assessment) without tiering, will disproportionately affect larger sites.
- The Regulatory Impact Assessment does not appear to model costs for multi-unit operations.
- Tiered or capped fees are essential to avoid penalising larger but compliant operators.

2.3 Directory, Advertising Requirements, and Liability

- The Bill makes it an offence to advertise accommodation without including a valid registration or licence number.
- We support requiring each business to display its number, but the legal duty must lie **with the accommodation provider**, not with third-party websites or DMOs.
- Major global booking channels (e.g., Airbnb, Booking.com) have shown in Spain and other countries that they are not afraid to remove listings they cannot verify. In Spain, over 53,000 listings were removed in 2025 for lacking verifiable registration numbers.
- If similar requirements were introduced in Wales without a robust verification system, this could severely impact Welsh tourism visibility.
- DMOs and local marketing organisations use bespoke, non-standard databases. There is *no technical means* to match national registration data with these systems. Attempting to do so would be costly, infeasible, and could deter businesses from participating in regional marketing.
- The current wording risks making DMOs liable for errors outside their control- such as mistyped, expired, or cancelled numbers. This would undermine our ability to offer affordable marketing and cross-promotion across regions.

Our Position: Each business should be required to display its registration/licence number, but the responsibility for accuracy must remain with the business. DMOs and other platforms should have a *display-only* obligation.

2.4 Importance to Welsh Destinations

DMOs like MWT Cymru play a vital role in supporting regional tourism. We promote accommodation, attractions, activities, and events collectively to build the regional visitor economy. Overburdening DMOs with compliance and verification obligations risks undermining this work, weakening Wales's collective destination marketing infrastructure, and reducing opportunities for small independent businesses to reach audiences online.

2.5 System Design and Simplicity

- The registration and licensing process must be simple and user-friendly.
- The system should allow straightforward document uploads and avoid duplicate data entry for each unit.
- The complexity of form-filling and data collection must be proportionate to business size and risk.

2.6 Provisional Licences and Processing Times

- The Bill allows for provisional licences but lacks detail on their operation.
- We need an “apply and trade” system, issuing a provisional licence number immediately upon submission so businesses can continue trading while applications are processed.
- This mirrors Visit Wales's “awaiting grading” model and prevents businesses from being penalised due to administrative delays.

2.7 Training and Connectivity

- We understand training will likely be bilingual and online. However, provision must also be made for operators in rural areas where internet access is unreliable.
- We request clarity on the **purpose** and *outcomes* of the training - what will it achieve, how will it be assessed?

2.8 Enforcement, Local Authority Duties and Transparency

- We strongly support enforcement, but this should be a **statutory requirement** for local authorities, with clear duties about what they *must do* and *must not do* in their areas.
- This will ensure consistent enforcement across Wales and avoid a postcode lottery of compliance.

- Welsh Government has indicated that enforcement costs can be reclaimed from the Welsh Revenue Authority (WRA). While we welcome this, we must ensure councils are not given a “blank cheque”.
- There must be **transparency** around what can be claimed, how much, and what activities qualify as legitimate enforcement.
- Local authorities should be required to publish annual reports showing actions carried out and expenditure claimed.
- Without such transparency and a statutory enforcement requirement, the intended “level playing field” cannot be achieved.

2.9 Scope Expansion and Fairness Across Sectors

- Extending licensing to all accommodation sectors would ensure fairness and remove confusion between “registered” and “licensed” businesses.
- A unified approach would eliminate the need to determine which parts of a mixed-use business require licensing and which do not and would support the ‘level playing field’ and ensure standards and safety across the sector.

3. Recommendations

1. **Clarify the Definition of Premises:** Allow single applications covering multiple units within one site.
2. **Tiered Fee Structure:** Introduce scaled fees and caps to prevent disproportionate costs for large or multi-unit operators.
3. **Advertising Rules:** Require all businesses to display their registration/licence number, but remove verification obligations from DMOs and third-party platforms.
4. **Technical Feasibility:** Before imposing any verification system, Welsh Government must publish a *technical feasibility study* showing how/if it could work across multiple data systems and architectures.
5. **Provisional Licensing:** Implement an “apply-and-trade” provisional system to prevent downtime for businesses.
6. **Training Access:** Provide online training with offline options for rural operators and clarify its purpose and outcomes.
7. **Enforcement Requirements:** Make enforcement a statutory duty for local authorities, with clear guidance on required actions, reporting, and transparency over costs claimed.

8. **Scope Expansion:** Extend licensing to all accommodation sectors to ensure consistency and eliminate confusion.
 9. **Simple System Design:** Ensure document upload and compliance processes are straightforward, with minimal duplication.
 10. **Avoid Unintended Consequences:** The system must be simple, proportionate, and achievable - not overly technical or burdensome.
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4. Questions for Welsh Government

1. How will “premises” be defined for multi-unit or mixed-use sites?
 2. Will fees be tiered or capped for larger operators?
 3. How will Welsh Government ensure that DMOs are not made legally liable for verifying licence numbers?
 4. What steps will be taken to prevent loss of listings on major booking platforms if verification mechanisms fail?
 5. How will provisional licences operate in practice?
 6. What is the purpose of the required training, and how will outcomes be measured?
 7. How will enforcement be resourced, monitored, and transparently reported?
 8. Will all accommodation sectors eventually be included in the scheme to ensure fairness? And to what timescales?
 9. What assurances will be given that system design will remain simple and accessible for small businesses?
 10. Will local authorities have clear statutory duties and transparency mechanisms to ensure equal enforcement across Wales?
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5. Conclusion

MWT Cymru fully supports the Welsh Government’s aim of ensuring a safe, fair, and transparent tourism accommodation sector. However, success will depend entirely on the scheme’s *practical implementation*. The system must be designed to work with the industry - not against it.

The Bill must avoid overcomplicating compliance or shifting liability onto DMOs and regional marketing organisations whose role is to promote, not police, businesses.

Enforcement must be statutory, transparent, and consistent, ensuring all local authorities uphold the same standards across Wales. We urge Welsh Government to ensure the framework remains proportionate, technically feasible, and delivers a genuine level playing field without unintended consequences for rural economies and already compliant businesses.

MWT Cymru remains committed to supporting Welsh Government in developing a scheme that strengthens and protects our tourism industry in Mid Wales

Contact:

Zoe Hawkins

Mid Wales Tourism (MWT Cymru)

Website: www.mwtcymru.co.uk



1. Support in Principle.

Visit Pembrokeshire supports in principle the introduction of a Statutory Licensing Scheme for ALL accommodation providers.

The following written evidence echoes, almost in its entirety, the points already submitted by Mid Wales Tourism which we endorse.

The reasons for our in-cu support are as follows:

- **Level Playing Field:** The tourism sector in Wales has long supported fair licensing to ensure safety, transparency, and consistency across all providers.
- **Consumer Confidence:** A registration scheme can strengthen visitor trust, providing reassurance that Welsh accommodation meets expected standards.
- **Centralised Oversight:** We support a national framework rather than fragmented local schemes. A unified approach ensures fairness and coherence across Wales.

2. Key Concerns

2.1 Rushed process – We believe the legislative process has been rushed with the consultation launched in the middle of the summer providing insufficient time for accommodation providers to engage. We believe it should be developed in line with the Registration scheme to avoid unintended consequences.

2.2 Definition of “Premises” and Mixed-Use Sites

- The Bill’s wording allows multiple licences for the same or part of the same premises. This could mean each *unit* on a holiday park or serviced apartment complex requires its own licence.
- For mixed-use sites or large operators, as currently drafted, this would result in substantial costs and administrative duplication.

- Clarification is needed to allow *single applications with multiple units listed* where safety and compliance documentation is shared.

2.3 Fee Structure and Cost Burden

- Although licence fees are not specified in the Bill and will be set by regulation, the suggestion of £75 per unit (Explanatory Memorandum / Regulatory Impact Assessment) without tiering, will disproportionately affect larger sites.
- The Regulatory Impact Assessment does not appear to model costs for multi-unit operations.
- Tiered or capped fees are essential to avoid penalising larger but compliant operators.

2.4 Directory, Advertising Requirements, and Liability

- The Bill makes it an offence to advertise accommodation without including a valid registration or licence number.
- We support requiring each business to display its number, but the legal duty must lie **with the accommodation provider**, not with third-party websites or DMOs.
- Major global booking channels (e.g., Airbnb, Booking.com) have shown in Spain and other countries that they are not afraid to remove listings they cannot verify. In Spain, over 53,000 listings were removed in 2025 for lacking verifiable registration numbers.
- If similar requirements were introduced in Wales without a robust verification system, this could severely impact Welsh tourism visibility.
- DMOs and local marketing organisations use bespoke, non-standard databases. There is currently *no technical means* to match national registration data with these systems. Attempting to do so would be costly, infeasible, and could deter businesses from participating in regional marketing.
- The current wording risks making DMOs liable for errors outside their control—such as mistyped, expired, or cancelled numbers. This would undermine our ability to offer affordable marketing and cross-promotion across regions.

Our Position: Each business should be required to display its registration/licence number, but the responsibility for accuracy must remain with the business. DMOs and other platforms should have a *display-only* obligation.

2.5 The important role DMOs play

DMOs like Visit Pembrokeshire play a vital role in supporting regional tourism. We promote accommodation, attractions, activities, and events collectively to build the regional visitor economy. We have very small teams already delivering on a wide remit of marketing, business support, research, advocacy and project delivery. Overburdening DMOs with compliance and verification obligations risks undermining this work, weakening Wales's collective destination marketing infrastructure, and reducing opportunities for small independent businesses to reach audiences online.

2.6 Provisional Licences and Processing Times

- The Bill allows for provisional licences but lacks detail on their operation.
- We need an “apply and trade” system, issuing a provisional licence number immediately upon submission so businesses can continue trading while applications are processed.
- This mirrors Visit Wales's “awaiting grading” model and prevents businesses from being penalised due to administrative delays.

2.7 Training and Connectivity

- We understand training will likely be bilingual and online. However, provision must also be made for operators in rural areas where internet access is unreliable.
- We request clarity on the *purpose and outcomes* of the training - what will it achieve, how will it be assessed?

2.8 Enforcement, Local Authority Duties and Transparency

- We strongly support enforcement, but this should be a **statutory requirement** for local authorities. We are concerned whether local authorities will have the resource to deliver on this duty. This will need to be addressed to ensure that there is consistent enforcement across Wales.

3. Recommendations

1. **Clarify the Definition of Premises:** Allow single applications covering multiple units within one site.
2. **Tiered Fee Structure:** Introduce scaled fees and caps to prevent disproportionate costs for large or multi-unit operators.
3. **Advertising Rules:** Require all businesses to display their registration/licence number but remove verification obligations from DMOs and third-party platforms.

4. **Technical Feasibility:** Before imposing any verification system, Welsh Government must publish due diligence showing how it could work across multiple data systems and architectures.
5. **Provisional Licensing:** Implement an “apply-and-trade” provisional system to prevent downtime for businesses.
6. **Training Access:** Provide bilingual online training with offline options for rural operators and clarify its purpose and outcomes.
7. **Enforcement Requirements:** Make enforcement a statutory duty for local authorities, with clear guidance on required actions, reporting, and transparency over costs claimed.
8. **Scope Expansion:** Extend licensing to all accommodation sectors to ensure consistency and eliminate confusion.
9. **Simple System Design:** Ensure document upload and compliance processes are straightforward, with minimal duplication.
10. **Avoid Unintended Consequences:** The system must be simple, proportionate, and achievable - not overly technical or burdensome.

4. Conclusion

Visit Pembrokeshire supports the Welsh Government’s aim of ensuring a safe, fair, and transparent tourism accommodation sector. However, success will depend entirely on the scheme’s *practical implementation*. The system must be designed to work with the industry - not against it.

The Bill must avoid overcomplicating compliance or shifting liability onto DMOs and regional marketing organisations whose role is to promote, not police, businesses. Enforcement must be statutory, transparent, and consistent, ensuring all local authorities uphold the same standards across Wales. We urge Welsh Government to ensure the framework remains proportionate, technically feasible, and delivers a genuine level playing field without unintended consequences for rural economies and already compliant businesses.

Visit Pembrokeshire remains committed to supporting Welsh Government in developing a scheme that strengthens and protects our tourism industry in Pembrokeshire.

Emma Thornton -CEO Visit Pembrokeshire

Please use this template to draft your responses to submit via the online consultation form.

Evidence from: Professional Association of Self-Caterers, UK Cymru

Senedd Cymru | Welsh Parliament

Pwyllgor yr Economi, Masnach a Materion Gwledig | Economy, Trade, and Rural Affairs Committee

Bil Datblygu Twristiaeth a Rheoleiddio Llety Ymwelwyr (Cymru) | Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill

You do not need to answer every question, only those on which you wish to share information or have a view.

1. What are your views on the general principles of the Bill, and whether there is a need for legislation to deliver the stated policy intention?

(We would be grateful if you could keep your answer to around 500 words).

- PASC UK Cymru are - and have always been - in support of a scheme which requires Visitor Accommodation providers to complete a Statutory Registration form demonstrating that they are compliant in all key legal aspects... e.g., fire, electric, gas, and covered by public liability insurance which is an established best practice within professional operators.
- It is our view that this could - and should have been delivered by a 'robust' Registration Scheme (including document upload and existing regulation and enforcement provision) in order to support existing health and safety regulations that the sector are already required to follow. This would eliminate the need for a separate Licensing Scheme and all that comes with it (ie costs, additional resource, uncertainty for the sector, overreach of Local Authorities, further erosion of trust in Welsh Government, additional burden on both those administering the Scheme and operators).
- The policy intention is stated as solely to ensure 'Safe & Legal' Visitor Accommodation and resultant assurance to the visitor of such. While we believe this could have been captured within a robust Registration Scheme, we support the policy objective.
- With this in mind, we would question why visitor safety is not considered important where a 'spare room' is offered to overnight visitors, when the risk is known to be considerably higher?
- It is widely accepted in fire circles that residential properties are the most at risk of fire properties in the UK. Reasons for this are obvious and include, clutter in houses, lack of gas

and electrical testing, limited fire alarms, existence of combustibles, lack of smoke detectors etc. **The Professional sector has to have mitigation in place to deal with these risks, by law.** For an effective Licensing Scheme, it is irresponsible not to mitigate these risks in ‘spare room’ accommodation provision.

- During the Oral Evidence Sessions, there is a suggestion of a policy intention to ‘control’ the provision of Visitor accommodation by Huw Thomas / WLGA. This is not a stated aim and we would not support this. This identifies a clear risk that WLGA / Local Authorities will overreach, especially if the Bill doesn’t have enough scrutiny to be tightly focussed on Health & Safety and to ensure it does not provide ‘back doors’ for control and/or overreach.
- We welcome the objective to **‘Promote Tourism, while also considering its social, environmental and Welsh-language impacts’**, and believe Welsh Government’s activity in this area, needs to be reviewed and re-balanced. The current legislative landscape is damaging to the Welsh Visitor Economy and hugely damaging to Welsh residents and Welsh Businesses who are being disproportionately disadvantaged. Welsh Government activities fail to demonstrate consideration to current market conditions, trends etc (e.g. 29% decrease in overnight visitor numbers 2022-2024).
- The Bill states it aims to **‘Address concerns that for some property owners it may seem easier to operate as a short-term let than as a long-term tenancy.’** On what basis is this suggested? Research suggests that there is no evidence to support this assumption, with extensive research suggesting the number of Long term landlords flipping is between 1% and 4%. [PASC UK 2025 Form & Value Report - PASC UK](#). In addition there has been 14.1% reduction in number of businesses in VOA list over 2 years 2023-2024.

RENTAL PROPERTY FEATURES	SHORT-TERM	LONG-TERM
Average stay or tenancy length	4.9 days	4.3 years
Owners organise and pay cleaning / laundry from 2-3 changeovers per week	✓	✗
Owners pay utility bills	✓	✗
Owners pay business rates (or council tax)	✓	✗
Owners pay VAT on turnover	✓	✗
Owners pay commercial waste disposal	✓	✗
Licenses needed for TV, music and film	✓	✗
Provides regular income stream	✗	✓
Management activity	Active	Passive
Fire regulations	Stringent	Standard residential
Insurance costs	High	Medium

- We have additional concerns about ‘scope creep’ as we are already hearing in Oral Evidence sessions that this is seen by Local Authorities (and Huw Thomas in particular) as a mechanism to maintain ‘control’ over self-catering businesses, particularly through Local Authority evidence sessions. This has been referenced regarding topics including Waste and Anti-social

Behaviour. We would argue that there are already other mechanisms in place to address these. If they are not effective, then they should be addressed rather than introducing a further legislative measure (and further use of public funds) which is not what the Bill aims to achieve.

- Deferring the Bill until registration has been completed, would allow a data-led Impact Assessment. This could then be based on actual numbers rather than at best, a calculated guess, backed up by a clearly demonstrated lack of understanding of the nuances of the sector.
- The Bill is being rushed through at the end of the Senedd term. This unseemly rush not only undermines the scope and therefore objectives of the scheme but also the execution of the scrutiny process and the base detail of how the will operate.
 - An October–March timetable leaves too little time for scrutiny, amendment, or meaningful sector engagement.
 - A three-week consultation period was insufficient, especially for micro-businesses, and essential operational details of the scheme are clearly still undefined whilst responding at the same time to a consultation on 182.
 - Given the sector’s economic importance (£0.7bn GVA, 18,300 jobs supported), major reforms require careful, transparent examination — not accelerated legislation.
 - Scotland’s experience shows that rushed, under-tested regulation can cause significant sector damage, legal disputes, and cost inflation; Wales risks repeating this.
- With 19 separate interventions already affecting the self-catering sector, we don’t believe the impact of how this further piece of legislation interacts with those other 18 interventions.

2. What are your views on the Bill’s provisions, including whether they are workable and will deliver the stated policy intention?

(We would be grateful if you could keep your answer to around 500 words).

- We are in support of the Minimum safety requirements (FRA, electrical, gas, PLI)
- Limiting licensing initially to self-contained self-catering properties will not deliver a level playing field due to the exclusion of a spare rooms. This was promised to the sector as a result of the previous consultation.
- Excluding “spare rooms” creates not only safety risks but also potential loopholes (e.g., whole houses split into unlicensed rooms).
- We would urge caution about being specific around duplicating additional requirements that are already stated in legislation (e.g., smoke detectors). It is unnecessary and makes it more difficult to update.
- Section 46 (advertising requirements) needs clarity regarding responsibility of third-party platforms.
- Enforcement responsibilities are unclear; risk of inconsistency if devolved to overstretched local authorities.
- We have concerns as we are already seeing Local Authorities suggest this is a way of maintaining ‘control’ over Visitor accommodation, which is not the stated objective

- Powers of entry are excessive given existing safety powers.
- Training requirements must respect operator experience; long-established compliant businesses should not be forced into unnecessary training – this alone would cause reputational damage, undermining the scheme.
- Annual renewal is essential to ensure a national ‘Register’ is kept up to date and therefore remains complete and useful.

3. In your view, are there any potential barriers to the implementation of the Bill’s provisions?

(We would be grateful if you could keep your answer to around 500 words).

- Rushed timetable provides insufficient time for consideration of the detail of the scheme or for the sector to respond, therefore undermining the scrutiny process.
- Lack of data on the number and type of operators – which will be provided by the registration scheme. We should wait for that before introducing this – or any other - additional legislation.
- Local authorities lack capacity, expertise, and resources for enforcement.
- Exclusion of key accommodation types creates loopholes and undermines compliance.
- Unclear responsibilities for advertising compliance on third-party platforms.
- Administrative burden: document uploads, annual renewals, duplication across local authorities.
- Micro-businesses already struggling under cumulative regulation may be unable to comply.
- Absence of a cumulative impact assessment means barriers cannot be fully evaluated.

4. Do you feel there will be any unintended consequences arising from the Bill?

(We would be grateful if you could keep your answer to around 500 words).

- The sector welcome a scheme which provides a level playing field, but we have to recognise this is yet another piece of legislation in an already over-loaded sector. There will be operators who exit the market due to this being yet another regulatory burden. ‘The straw that breaks the camel’s back’ These are micro-businesses for whom a large part of what they do is for the joy of welcoming guests to Wales. Every addition to the regulatory burden (and particularly the underlying threat of not meeting 182) continues to erode the satisfaction that keeps them operating.
- Reduced tourism accommodation supply would affecting competitiveness with England.
- The scheme as it stands provides incentives for avoidance and risks the growth of unregulated “black market” listings and ‘loopholes’, as seen in Scotland and already emerging in Wales.
- Perception that this is yet another ‘attack’ on self-catering businesses further erodes trust in the Welsh Government.
- Disproportionate impact on older and female operators and Welsh residents, families and Welsh Business owners, who make up the majority of the sector. This risks eroding Welsh language and Welsh heritage.

- Display of License numbers – need clarity on where the Legal responsibility lies as this could leave DMOs, Visit Wales and local websites exposed to legal risk for user-generated listings.
- Negative knock-on effects for rural economies dependent on tourism.

5. What are your views on the Welsh Government’s assessment of the financial and other impacts of the Bill as set out in Part 2 of the Explanatory Memorandum?

(We would be grateful if you could keep your answer to around 500 words).

- We appreciate the Welsh Government's genuine efforts to keep the costs of the scheme low. We believe WG have listened to our concerns in this area and the cost are stated in good faith, but we do have concerns that it is not realistic.
- The proposed £75 licence fee does not align with existing schemes e.g. RentSmart Wales, Scottish scheme.
- Impact Assessment assumptions on staffing and processing capacity are not credible, particularly compared to RentSmart Wales. (£254, with fewer checks)
- The Explanatory Memorandum repeatedly acknowledges data gaps yet proceeds regardless, undermining financial assessment validity.
- Paper-based applications and supporting document verification are not costed.
- Ministers have powers to raise fees or introduce premiums, this is a major concern given Scotland’s escalating costs.
- Annual compliance costs will reduce margins or raise prices, though raising prices risks losing competitiveness with England.
- While a *robust* scheme is welcomed by the sector, we do need to consider that this is a cost to operators. If considered in isolation, it is ok, but it is one of many legislative and operational costs and it needs to be considered in this context. In particular the entire sector risks excessive council tax costs which threatens all Self-catering businesses in Wales (regardless of whether they achieve 182 or not). As we have seen this is impacted by elements outside of their control e.g. Covid, weather, cost of living.
- Little consideration appears to have been given to the ‘multiplier effect’. Larger sites would face disproportionate costs (e.g. A 50-unit business would be £3,750).
- Had a robust Registration Scheme been executed this would save a large part of the estimated £4.5m required for this scheme.

6. What are your views on the appropriateness of the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Part 1: Chapter 5 of the Explanatory Memorandum)?

(We would be grateful if you could keep your answer to around 500 words).

- Many key elements - fees, renewals, training requirements, premiums - are delegated rather than set on the face of the Bill.
- This appears driven by the rushed timetable rather than good legislative design.
- Delegated powers could allow significant cost escalation or expansion of scope without sufficient scrutiny. For example the appetite from Local Authorities to 'control' the sector – this needs to be clearly defined.
- Lack of fixed parameters creates further uncertainty for operators
- Greater detail should be included in the Bill to ensure transparency.
- This scheme is an opportunity for Welsh Government to win back some trust from the sector. As the Bill stands the scheme lacks necessary detail and therefore risks further erosion of that trust.

7. Are there any other issues you would like to raise about the Bill and the Explanatory Memorandum or any related matters?

(We would be grateful if you could keep your answer to around 500 words).

- We appreciate the engagement with Welsh Government and officials on this scheme since its inception and we welcome some of the key points such as a National Scheme, We also welcome the comments from Mark Drakeford in his Oral Evidence session relating to Training.
- No cumulative impact assessment has been carried out, despite 19 concurrent interventions affecting the sector, and despite ministers being fully aware of the 'scale of the attack' on Welsh self-catering businesses.
- Majority of Welsh self-catering businesses are micro-businesses, locally owned, often by women and people over 60 — the Bill disproportionately affects them.
- Mental health impacts are significant (94% report increased stress since the 182-day rule). These impacts have repeatedly been brought to the attention of the Welsh Government with no meaningful acknowledgement or strategy to reduce them.
- Failing to wait for registration scheme data risks designing legislation blind.
- A proportionate Safe & Legal Registration Scheme is strongly supported — but the Bill's timing, scope and design risk harming the very businesses it seeks to regulate.
- Our key concerns are:
 - Scope – not including 'spare rooms'
 - This must be an 'Apply and operate' scheme with no delay in operation
 - The cost
 - While we appreciate the effort to keep the costs low and believe this is in response to our engagement with Welsh Government on this point. We believe this is intended in good faith, but... the costs seem out of line with existing schemes and without the data required to make a robust estimate.
 - Selling as a going concern – If a business is to be sold, any suggestion of 'waiting for a License' will jeopardise a sale. There must be provision to transfer a licence to a new buyer.
 - Rushed Process – outlined above

Mid and West Wales Fire and Rescue Service
South Wales Fire and Rescue Service
North Wales Fire and Rescue Service

4 November 2025

Dear all,

Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill

As you may be aware, the Welsh Government has introduced the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill ("the Bill") to the Senedd on 3 November 2025. The Bill has been referred to the Economy, Trade and Rural Affairs Committee for Stage 1 scrutiny of its general principles.

With regard to the licensing provisions within the Bill, I would welcome your views on the following points:

- Do you foresee any impact on demand for independent fire assessors resulting from the Bill?
- Do you have a view on section 20(8) of the Bill, which removes the requirement under article 42(1)(a) of the Fire Safety Order for the Welsh Ministers (as licensing authority) to ensure that a relevant fire and rescue authority has the opportunity to make representations before they issue a licence under this scheme?
- In determining a licence application Welsh Ministers will be able to use any information or evidence provided by a fire and rescue authority. Do you have a view on the information sharing provisions in the Bill and how these will work in practice?

- The Bill's accompanying Explanatory Memorandum ("EM") states that "there is currently no data available on the characteristics of premises or levels of compliance with the existing statutory obligations". The EM also refers to "anecdotal non-compliance" with the existing statutory requirements. Does this reflect the fire authority's experience and do you have a view on the evidence base for the proposals in this Bill?

Further details of the Committee's scrutiny of the Bill are available on our [website](#). You would be welcome to comment any other aspect of the legislation that you may feel relevant to our scrutiny.

Due to the short timeframe for Stage 1 scrutiny, I would be grateful if you could provide a response to these points by Friday 14 November if possible.

Yours sincerely,

A handwritten signature in black ink that reads "Andrew RT Davies". The signature is written in a cursive style with some capital letters.

Andrew RT Davies MS

Chair: Economy, Trade and Rural Affairs Committee

We welcome correspondence in Welsh or English

Gwasanaeth Tân ac Achub
De Cymru



South Wales
Fire and Rescue Service

Welsh Parliament
Cardiff Bay
CF99 1SN

SeneddEconomy@senedd.wales

Our Ref: ER/Senedd
Your Ref:
Date: 14 November 2025
Contact: Group Manager E. Robson
Tel:
E-mail: firesafety@southwales-fire.gov.uk

Dear Sir,

Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill (“the Bill”)

Please find the response from South Wales Fire and Rescue Service, to questions raised by the Senedd along with our further comments and observations.

1. Do you foresee any impact on demand for independent fire assessors resulting from the Bill?

The implementation of the Bill will introduce a mandatory licensing regime for visitor accommodation in Wales. One of the key licensing conditions will require that accommodation meets specific safety standards, including evidence of a suitable fire risk assessment and related safety systems (such as smoke and carbon monoxide alarms). Consequently, accommodation owners will need to commission or provide fire risk assessments that meet regulatory scrutiny in order to obtain or maintain a licence.

It is therefore likely that demand for independent fire assessors will increase. However, the extent of this demand will depend on how the licensing system is rolled out. Factors such as the pace of implementation, enforcement mechanisms, and whether assessors are positioned as formal “gatekeepers” to the licensing process will all influence how intensely their services are required. If existing assessments are accepted by the licensing authority, demand may grow more gradually.

Additionally, it is not yet clear whether assessors will be required to meet particular accreditation or standardisation criteria. If such requirements are introduced, only suitably qualified assessors will be able to undertake this work, helping to ensure quality and consistency. Conversely, if no clear standards are set, there is a risk that less qualified individuals may provide substandard assessments.

Conclusion

In summary, the introduction of the Bill is expected to increase demand for independent fire assessors in Wales. The scale and timing of this increase will depend on how the licensing framework is implemented and whether formal qualification standards are established. Clear accreditation and phased implementation would help balance demand, maintain quality, and support effective compliance across the sector. Clarity on these matters will be highly desirable for the future of fire safety in Wales.

Pencadlys Gwasanaeth Tân ac Achub De Cymru,
Parc Busnes Forest View, Llantrisant, Pont-y-clun, CF72 8LX.

Ffôn 01443 232000 • Ffacs 01443 232180
www.decymru-tan.gov.uk

Rydym yn croesawu gohebiaeth yn y gymraeg a'r saesneg - byddwch yn ymateb yn gyfartal i'r ddau ac yn ateb yn eich dewis iaith heb deilwng.

South Wales Fire and Rescue Service Headquarters,
Forest View Business Park, Llantrisant, Pontyclun, CF72 8LX.

Telephone 01443 232000 • Fax 01443 232180
www.southwales-fire.gov.uk

We welcome correspondence in Welsh and English - we will respond equally to both and will reply in your language of choice without delay.

2. Do you have a view on section 20(8) of the Bill, which removes the requirement under article 42(1)(a) of the Fire Safety Order for the Welsh Ministers (as licensing authority) to ensure that a relevant fire and rescue authority has the opportunity to make representations before they issue a licence under this scheme?

Whilst section 20(8) of the Bill removes the requirement for the relevant fire and rescue authority to make representations, the Bill does appear to allow evidence from the fire and rescue authority to be considered when assessing licence applications. However, by not guaranteeing the fire and rescue authority a formal role in providing representations, there is a risk that the views of fire and rescue authority are not adequately elicited and vital professional evidence could be lost, which could impinge on public safety. Licences could be issued without direct input from the fire and rescue authority.

Although this change may streamline the administrative process and reduce delays in issuing licences, it also introduces potential risks. Issues related to fire safety may only come to light after a licence has been granted, rather than being identified during the application stage. This could increase the likelihood of non-compliant or unsafe premises being licensed

Furthermore, removing the fire and rescue authority as a formal consultee means the licensing process will rely more heavily on the accuracy and quality of documentation submitted by applicants. As a result, the standard of fire risk assessments will become even more critical in ensuring public safety. As mentioned previously, increased demand for assessors could affect both quality and consistency if appropriate standards and oversight are not maintained.

Conclusion

In summary, although section 20(8) has the potential to streamline the licensing process, it also diminishes the direct involvement of fire and rescue authorities, which may increase the likelihood of non-compliance going undetected. To address this, clear procedures are needed to ensure that robust fire safety evidence and competent assessments are central to licensing decisions. Nevertheless, given the critical role of fire and rescue authorities in safeguarding public safety, it is our view that they should retain formal consultee status within the licensing process.

3. In determining a licence application, Welsh Ministers will be able to use any information or evidence provided by a fire and rescue authority. Do you have a view on the information-sharing provisions in the Bill and how these will work in practice?

It is positive that section 20(6)(b)(iii) of the Bill recognises evidence supplied by fire and rescue authorities as grounds for refusing a licence application. However, the Bill does not make clear how this information-sharing process will operate in practice. There are several practical questions that arise. For example, will fire and rescue authorities be proactively asked to provide information, or will they only respond to specific requests? What mechanisms will be in place for such requests, and what timescales will apply for responses? Clarity on these points is essential to ensure a consistent and efficient process.

Additionally, it is unclear how the licensing authority will handle cases where conflicting evidence is presented, for instance, where an applicant or independent assessor asserts compliance, but the fire and rescue authority disagrees. Without clear procedures, such disputes could delay licensing decisions or undermine confidence in the process.

To function effectively, the information-sharing provisions must be supported by detailed guidance. This should define what constitutes acceptable 'evidence', clarify the weight given to different sources of information, and set out how disagreements between assessors and fire and rescue authorities will be resolved.

Conclusion

In summary, while the inclusion of fire and rescue authority evidence in the licensing process is welcome, the Bill currently lacks detail on how information-sharing will work in practice. Clear protocols and guidance are needed to ensure timely communication, consistency in decision-making, and the effective use of fire safety evidence to support public protection.

- 4. The Bill's accompanying Explanatory Memorandum ("EM") states that "there is currently no data available on the characteristics of premises or levels of compliance with the existing statutory obligations." It also refers to "anecdotal non-compliance" with existing requirements. Does this reflect the fire authority's experience, and do you have a view on the evidence base for the proposals in this Bill?**

The EM's reference to limited data and anecdotal non-compliance reflects the fire authority's experience. There is currently no central database or consistent reporting mechanism capturing information on smaller visitor accommodation, such as Airbnb-type properties or small bed-and-breakfasts. As a result, understanding of overall compliance with fire safety legislation remains incomplete, with inspections typically triggered by complaints, incidents, or shared intelligence rather than proactive monitoring.

The proposed licensing regime provides an opportunity to improve data collection and understanding of fire safety risks within the sector. However, without a strong evidence base at the outset, there is a risk that the framework may not be fully proportionate or targeted to actual risk levels.

Conclusion

The EM's assessment aligns with operational experience, better data and structured evidence gathering will be essential to ensure the Bill delivers proportionate and effective fire safety regulation.

Further to this, we have identified two further items of specific concern.

1. Responsibility for Fire Risk Assessment

Section 9(2) of The Bill places the responsibility on the Visitor Accommodation Provider (VAP) to *carry out* a fire risk assessment. However, this requirement may be impractical and could lead to inconsistent or inadequate assessments as VAPs, particularly those operating small-scale or domestic-type visitor accommodation, are unlikely to possess the necessary competence or technical understanding to carry out a compliant assessment.

The responsibility should instead be for the VAP to *ensure* that a suitable and sufficient fire risk assessment is carried out, rather than requiring them to conduct it personally and as such this should be expressly stated.

Expressly stating that VAPs can appoint a competent person, such as a qualified and experienced fire risk assessor to complete the assessment on their behalf, would ensure consistency, accuracy, and regulatory compliance. It would also align the Bill more closely with the principles of the **Regulatory Reform (Fire Safety) Order 2005**, which places the

duty on the “responsible person” to ensure that a suitable and sufficient assessment is undertaken, not necessarily to carry it out themselves.

Recommendation

The wording of the Bill should be amended to require the VAP to *ensure* a suitable and sufficient fire risk assessment is completed by a competent person, rather than the provider themselves *conducting* it. This would promote higher standards of safety and reduce the likelihood of non-compliant or inadequate assessments.

2. Provision of Smoke Alarms and Fire Detection

The Bill appears to imply that the installation of a single smoke alarm per floor would be sufficient to meet the minimum safety requirements. This approach risks oversimplifying fire safety provision and could lead to inadequate protection in certain types of visitor accommodation. In a risk-based legislative framework, the level and type of fire detection should be determined by the specific risks present within the premises, not by a blanket minimum standard.

The characteristics of visitor accommodation can vary greatly, from small single-room lets to larger multi-room or multi-storey properties with complex layouts. A single smoke alarm per floor may be appropriate for a small, open-plan dwelling but would be wholly inadequate for premises with multiple bedrooms, escape routes, or areas where a fire could develop undetected.

Under existing fire safety legislation, such as the **Regulatory Reform (Fire Safety) Order 2005**, the adequacy of fire detection and alarm systems must be informed by a *suitable and sufficient fire risk assessment*. This ensures that the level of detection is proportionate to the size, layout, and use of the property, as well as the profile of occupants.

Aligning the Bill with this established risk-based approach would strengthen its effectiveness and prevent misinterpretation of minimum requirements as “standalone” compliance. The emphasis should be on ensuring that each property has a detection system appropriate to the identified fire risks, rather than simply meeting a numerical minimum.

Recommendation

The Bill should clarify that the adequacy of smoke and fire detection systems must be determined through a *suitable and sufficient fire risk assessment*. The requirement for “one smoke alarm per floor” should be presented only as a basic starting point, not as a definitive standard of compliance.

Yours faithfully,

Duly signed and authorised by



Print Name: Group Manager E Robson

for Assistant Chief Fire Officer



Gwasanaeth Tân ac Achub
Canolbarth a Gorllewin Cymru

Mid and West Wales
Fire and Rescue Service

Consultation

November 2025

Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill



Diogelwch Tân Busnes
Business Fire Safety

Pack Page 61

Dear Sir/Madam,

Please find the responses of Mid and West Wales Fire and Rescue Service in relation to the [Development of Tourism and Regulation of Visitor Accommodation \(Wales\) Bill](#).

1. Do you foresee any impact on demand for independent fire assessors resulting from the Bill?

Response

We anticipate that the introduction of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill will lead to a significant increase in demand for independent fire risk assessors.

The Bill will apply to approximately 24,000 premises across Wales, many of which, such as short-term lets, self-catering units, holiday parks, and guesthouses, are currently outside the scope of routine fire safety oversight. Under the new scheme, accommodation providers will be required to demonstrate compliance with minimum fire safety standards, which may include the provision of a fire risk assessment.

Given that many of these premises are operated by individuals or small businesses without in-house fire safety expertise, it is likely that they will seek support from independent fire risk assessors to meet licensing requirements. This will place increased pressure on the sector to deliver timely and competent assessments, particularly in the lead-up to the scheme's implementation.

We also note that the Building Safety (Wales) Bill is expected to generate additional demand for fire safety expertise, further compounding the need for qualified assessors across Wales. Consideration should be given to the capacity of the fire risk assessment sector to meet this demand, including potential measures to support training, accreditation, and public awareness.



2. Do you have a view on section 20(8) of the Bill, which removes the requirement under article 42(1)(a) of the Fire Safety Order for the Welsh Ministers (as licensing authority) to ensure that a relevant fire and rescue authority has the opportunity to make representations before they issue a licence under this scheme?

Response

Removing the statutory requirement for FRS consultation reduces an important gateway in the consultation process. Our input helps ensure premises meet fire safety standards before occupation. The lack of a formal consultation step with the Fire and Rescue Authorities may reduce the Bills ability to improve public safety. The omission appears inconsistent with the Bill's broader emphasis on information sharing.

However, given that the Bill is expected to apply to approximately 24,000 premises across Wales, many of which are classified as low-risk, such as short-term self-catering units, holiday parks, short-term lets, and small guesthouses. It is the opinion of MAWWFRS, that the requirement for the Fire and Rescue Services to make representations on every initial licence application would place a disproportionate burden on resources. It should be noted that these premises are not routinely inspected under our Risk-Based Inspection Programme, and in most cases, we hold limited or no information about them.

When considering the information provided above, we feel further consideration could be taken to determine the potential risk that Section 20(8) may present. We propose establishing a process that allows Fire and Rescue Authorities to request a licence review when intelligence gathered under existing Regulatory Reform (Fire Safety) Order 2005 workstreams highlights significant risk or non-compliance.



3. In determining a licence application Welsh Ministers will be able to use any information or evidence provided by a fire and rescue authority. Do you have a view on the information sharing provisions in the Bill and how these will work in practice?

Response

We acknowledge the provision within the Bill that allows Welsh Ministers to consider information or evidence provided by Fire and Rescue Authorities when determining licence applications. While we support the principle of inter-agency collaboration, we believe the practical implementation of this provision requires careful consideration.

In practice, Fire and Rescue Services are likely to hold limited or no existing information on the majority of premises that fall within the scope of this Bill. Many of these, such as short-term self-catering units, holiday parks, short-term lets (e.g. Airbnb-style rentals), and small guesthouses, are typically classified as low-risk under our Risk-Based Inspection Programme and are not routinely inspected. As a result, our ability to contribute meaningful data for most licence applications may be limited.

For medium-risk premises, such as hotels and larger guesthouses, some information may be available. However, this is often obtained through local authority licensing consultations rather than through direct inspection or enforcement activity. In these cases, the local authority may already hold the relevant information, and requesting it again from the Fire and Rescue Service could lead to duplication of effort and inefficiencies.

To ensure the information-sharing provisions are effective and proportionate, we recommend that:

- Clear protocols are established outlining when and how Fire and Rescue Services will be asked to provide information;
- Requests are targeted and risk-based, focusing on premises where fire safety concerns are more likely to arise;
- Consideration is given to the resource implications for Fire and Rescue Services, particularly if additional administrative or inspection duties are anticipated.

We are committed to supporting the safe regulation of visitor accommodation in Wales and welcome further dialogue on how best to implement these provisions in a way that is both practical and aligned with our statutory responsibilities.



4. The Bill's accompanying Explanatory Memorandum ("EM") states that "there is currently no data available on the characteristics of premises or levels of compliance with the existing statutory obligations". The EM also refers to "anecdotal non-compliance" with the existing statutory requirements. Does this reflect the fire authority's experience, and do you have a view on the evidence base for the proposals in this Bill?

Response

We acknowledge the statement in the Bill's Explanatory Memorandum that there is currently no comprehensive data available on the characteristics of premises or levels of compliance with existing statutory obligations. This observation aligns with our operational experience across the Mid and West Wales region.

We note the reference to "anecdotal non-compliance" in the Explanatory Memorandum. While we do not possess a formal dataset to quantify this, our experience suggests that there are indeed inconsistencies in fire safety awareness and compliance among smaller accommodation providers, particularly those operating outside traditional licensing frameworks.



5. Additional Comments

Response

With reference to Section 9 of the draft Bill, we would like to share the following comments:

- Section 9 (2) – The wording of this section leads to the following observation.

The responsibility of the Visitor Accommodation Provider (VAP) is to ensure that a Fire Risk Assessment (FRA) has been undertaken, not to personally conduct the FRA, as the current language in the Bill may imply. According to guidance provided on GOV.UK under Section 159 of the Building Safety Act, individuals are responsible for ensuring their FRA is suitable and sufficient. If a third party is engaged to carry out the assessment, it is recommended that they are competent to do so.

Note: Following consultation with our external Legal Advisor, it is agreed that the duty placed on the VAP is to “ensure that a Fire Risk Assessment (FRA) has been undertaken, not to personally conduct the FRA.” Since the responsibility is a legal one which the VAP can discharge by sourcing a competent fire risk assessor, the preference would be for any duties to be expressly stated, rather than implied, and the placing of this duty on the VAP should be explicitly set out in the Bill.

- Section 9 (3) – Observations around the way fire detection requirements are referenced in this section.

It states that regulated visitor accommodation, whether in a building, mobile home, vessel, or other vehicle, must have at least one functioning smoke alarm installed on each storey. This wording could be interpreted to mean that a single smoke alarm per floor is sufficient, which risks underrepresenting the necessary level of protection. This provision appears to conflict with the guidance outlined in [A Guide to Making Your Guest Accommodation Safe from Fire](#), which holds Article 50 status and is widely regarded as the most appropriate reference document. That guidance specifies the need for heat alarms, and detection in high-risk rooms, including bedrooms to ensure comprehensive coverage. In addition to the statutory guide, British Standard 5839 Part 6 has, since its 2019 revision, also indicated a standard of ‘LD1’ for self catering accommodation (Table 1); in simple terms requiring smoke detectors in most rooms.

Note: Following consultation with our external Legal Advisor, it is suggested that the wording should be tightened to state that there should be the provision of one or more functioning smoke alarms on each floor, in accordance with a suitable and sufficient the fire risk assessment for the premises.



Timothy Douglas
Head of Policy and Campaigns
Propertymark

4 November 2025

Dear Timothy,

Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill

As you will be aware, the Welsh Government has introduced the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill ("the Bill") to the Senedd on 3 November 2025. The Bill has been referred to the Economy, Trade and Rural Affairs Committee for Stage 1 scrutiny of its general principles.

The Bill's accompanying Explanatory Memorandum ("EM") suggests that the Bill's aim of better aligning the regulation of self-catering visitor accommodation with the regulation of the private rented sector will "help to address concerns that for some property owners it may seem easier to operate as a short-term let than as a long-term tenancy, which can lead to the erosion of long-term residential housing stock in some communities." In setting this context, the EM cites data from a Capital Economics report for ARLA Propertymark, 'The impact of short-term lets', from January 2020.

I would therefore welcome your views on this particular aspect of what the Bill, if passed, might achieve. In addition, I would welcome your views as to whether the Welsh Government's policy and legislative interventions in the past few years (changes to self-catering NDR, as referenced at paragraph 3.42 of the EM, new planning use classes, as referenced at paragraph 3.41 of the EM, and council tax premiums on second homes) have had any impact on the likelihood of landlords switching from the private rented sector to short-term lets.

Due to the short timeframe for Stage 1 scrutiny, I would be grateful if you could provide a response to these points by Friday 14 November if possible.

Yours sincerely,

Andrew RT Davies

Andrew RT Davies MS

Chair: Economy, Trade and Rural Affairs Committee

We welcome correspondence in Welsh or English



Welsh Parliament - Economy, Trade, and Rural Affairs Committee
Consultation: Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill
Response from Propertymark
November 2025

Background

1. Propertymark is the UK’s leading professional body for estate and letting agents, property inventory service providers, commercial agents, auctioneers and valuers, comprising over 19,000 members representing over 12,800 branches. We are member-led with a Board which is made up of practicing agents, and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.¹

Overview

2. The Chair of the Senedd Economy, Trade and Rural Affairs Committee, has requested information regarding the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, which was introduced to the Senedd on 3 November 2025.
3. The Committee is particularly interested in the Bill’s potential impact particularly how aligning regulation of self-catering visitor accommodation with the private rented sector might:
 - Address concerns that some property owners find it easier or more profitable to operate short-term lets instead of long-term rentals; and
 - Help reduce the loss of long-term residential housing in certain communities.
4. The Committee also wants to know if these measures have affected the likelihood of landlords switching from the private rented sector to short-term letting. Additionally, the committee is interested in whether Welsh Government interventions introduced in recent years have influenced landlords’ behaviour, including:
 - Changes to non-domestic rates (NDR) for self-catering accommodation.
 - Introduction of new planning use classes for short-term lets.
 - Implementation of council tax premiums on second homes.

Benefits of Short-Term Lets

5. Short-term lets are properties that are rented out for shorter time periods than the private rented sector. These periods are usually between a few weeks and six months. Short term lets offer several advantages for different stakeholders:
 - **Property owners** - they can provide enhanced rental income, greater flexibility of letting their property for a term that suits them , reduced void periods and generating extra income while travelling or trying to sell a property.

¹ <https://www.propertymark.co.uk/>



- **People in the process of buying and selling** – short lets are used by people that are in the process of buying or selling a property and find themselves in need of temporary accommodation in order to meet the deadlines of their buyer or seller.
- **Estate and letting agents** - may benefit from business expansion opportunities associated with managing short-term holiday lets to help people boost their rental income and meet their needs without the risk or hassle of listing on sites like Airbnb.
- **Visitors or users of short term lets** - can get a home to stay in rather than a hotel or bed and breakfast accommodation or holiday park.
- **Tenants and people moving for work** – can gain access to temporary accommodation, flexibility in moving between locations, and the ability to trial new areas before committing to a longer-term lease.
- **Communities** - can also see benefits, as short-term lets can generate an economic boost through tourism and ensure that otherwise empty properties are occupied.

Drawbacks of Short-Term Lets

6. However, short-term lets also have drawbacks. These include:

- **Reduce the supply of housing in the private rented sector** - contributing to rental inflation and reduced affordability.
- **Neighbourhood issues** – local residents may experience antisocial behaviour, security concerns, pressure on parking and waste management.
- **Reduce housing supply for home buyers and sellers** - high-demand areas, in particular, face localised affordability pressures, which can make it more difficult for first-time buyers to access the housing market.
- **Inconsistent income for people letting their property on short term basis** – even holiday lets in the most popular locations will have off-peak seasons. Furthermore, people must consider running costs such as cleaning fees as well as pay utility bills on the property with potentially higher costs for water, electricity, gas and broadband based on usage.

Potential impact of the Bill on regulatory alignment



7. Propertymark cautiously supports the Bill's aim to better align the regulation of self-catering visitor accommodation with that of the private rented sector, recognising the importance of addressing concerns about the loss of long-term rental housing to short-term lets.
8. Our joint research as an independent partner with the Welsh Tourism Alliance², indicates that growth in short-term lets is highly localised, with 76% of agents in tourist hotspots reporting increases over the past four years, compared to just 33% in non-tourist areas. Coastal versus non-coastal differences were less pronounced, but local market factors remained critical. The report also highlights that, in many tourism-intensive areas, the types of properties entering the short-term let market are often larger homes, high-end apartments, or properties located in prime coastal or scenic locations. These are typically outside the price range of local residents seeking affordable, long-term housing. As a result, while regulatory alignment between the short-term let sector and the private rented sector is an important step towards ensuring consistency and accountability, it may not, on its own, be sufficient to protect or increase the supply of affordable homes for local communities. Broader measures that address housing mix, local affordability, and investment in new housing stock will likely be required to achieve a sustainable balance between tourism growth and residential housing needs.
9. Furthermore, a substantial proportion of the growth in the short-term let market has resulted from the reallocation of existing housing stock rather than new development. Evidence suggests that around 38% of short-term lets originate from properties previously used within the private rented sector, highlighting a significant movement of homes away from long-term residential use. A further 34% of growth has come from new property purchases made specifically for entry into the short-term letting market, reflecting the increasing commercialisation of this sector. Additionally, 23% of short-term lets are drawn from second homes, where owners are seeking to generate income during periods of non-occupancy. Collectively, these trends demonstrate how the expansion of short-term letting has implications for local housing availability and affordability, particularly in high-demand areas where rental supply is already constrained.
10. Looking at the impact tourism has on a wider UK perspective, our research report into the impact of short-term/ holiday lets on UK housing³, focused on academic research by Dunning and Moore which notes that short-term lets can represent an efficient use of under-utilised dwellings, defined as homes unoccupied for significant portions of the year. Their work recognises that, in some contexts, converting such properties into short-term accommodation helps improve utilisation of housing stock. However, the same research remains alert to the wider risks and highlights concerns around antisocial behaviour, disruption to local communities, and the depletion of the private rented sector in areas where long-term residential housing is displaced. Thus, while the potential efficiency of short-term lets is

² [Preliminary-Report-for-the-Cabinet-Secretary-for-Housing.pdf](#)

³ <https://www.propertymark.co.uk/static/34007f53-b156-47e6-98dca90b51ab87e8/Impact-of-short-term-holiday-lets-on-UK-housing.pdf>



acknowledged, the study emphasises that regulatory safeguards and community protections are still critically needed.

11. Overall, while the Bill has the potential to improve regulatory clarity and strengthen incentives for landlords to maintain properties within the long-term rental sector, its effectiveness will depend on robust implementation, monitoring, and enforcement. This will be particularly critical in tourism-concentrated communities, where housing demand is elevated and pressures on local affordability, availability, and community cohesion are most pronounced.

Impact of recent policy and legislative interventions

12. We understand the Committee is particularly interested in the effects of recent policy interventions, specifically changes to self-catering non-domestic rates, planning reforms, and council tax premiums on second homes, on landlord behaviour and the private rental sector. Available evidence suggests that these measures have influenced decisions in some areas, though the impact has been highly variable and context specific.
13. Some letting agents report that short-term lets have a negative impact on the private rental sector, primarily through reduced housing supply and upward pressure on rents, with 69% of agents indicating a negative effect and 41% expressing concern. Estate agents generally see less impact on property sales, although they do note localised issues in popular tourist hotspots where holiday lets are concentrated. The situation is further complicated by the fact that some agents specialise in holiday let management and therefore operate within both the short-term and long-term rental markets. In certain areas, particularly those with a larger housing stock or less intensive tourism, holiday lets appear to have a more limited impact on rents and availability. This variation suggests that a one-size-fits-all approach to regulating short term lets in Wales is unlikely to be effective; instead, locally tailored solutions that reflect the intensity of tourism and housing pressures in specific communities are required.

Non-domestic rates policy

14. Adjustments to the self-catering non-domestic rating system in Wales have changed the financial calculations for landlords operating short-term holiday accommodation. Under the current rules, a property must be available for letting for at least 252 days per year and actually let for at least 182 days per year to qualify as non-domestic and be liable for business rates. Smaller properties or those in less tourism-intensive areas may fall below these thresholds and remain classified as domestic, meaning they continue to pay council tax, resulting in a relatively limited financial impact. In contrast, larger or higher-value properties in popular tourist destinations are more likely to meet the thresholds and therefore may experience a greater effect due to business rates liability.



15. Our recent response to the Welsh Government’s consultation on proposed refinements to the classification of self-catering properties for local tax purposes⁴, supported the Welsh Government’s proposal to allow days let to be averaged over multiple years as evidence of compliance with the 182-day letting requirement for self-catering properties. This flexibility acknowledges the seasonal nature of the self-catering market and recognises that occasional shortfalls in occupancy should not lead to immediate reclassification and financial uncertainty for operators. However, we also highlighted that achieving the current 182-day letting threshold can be challenging for many operators, especially in areas with variable demand or outside peak seasons. We suggested that the Welsh Government consider reducing this threshold to around 120 days, which would better reflect realistic occupancy patterns while still supporting the policy intent of classifying properties operating as genuine businesses.

Planning Use Classes & Occupancy Restrictions

16. The introduction of new planning use classes and adjustments to permitted development rights in Wales, for example, local authority Article 4 directions, has increased oversight of short-term holiday lets, particularly in tourist hotspots. One such example is Gwynedd Council who implemented an Article 4 Direction in the Gwynedd Local Planning Authority area (outside Eryri National Park) which came into effect from 1 September 2024⁵ Under this direction, properties which are main residences (Use Class C3) cannot be changed to second homes (C5) or short-term holiday lets (C6) without first obtaining planning permission⁶. We responded to Gwynedd Council’s consultation and reported that agents report that these new administrative burdens may discourage some landlords from switching to short-term lets because of the extra compliance step. However, they should also consider their use carefully as there is a synergy in their use in restricting holiday lets and the knock-on impact in reducing property values⁷.

Council tax premiums

17. Council tax premiums on second homes in Wales serve as a partial disincentive to ownership, but they are generally less effective in high-demand tourist areas where buyers are relatively insensitive to additional costs. Some agents reported that these premiums negatively affected local residents in tourism hotspots, such as Gwynedd, who could not afford the higher charges, while having little deterrent effect on investors from nearby areas in England, such as Cheshire. Both the 2022 PropertyMark survey and the 2024 Wales Tourism Alliance report highlight the highly localised nature of second-home ownership and note the difficulty of measuring the true impact of these premiums without robust, property-level data.

Conclusion

⁴ [Proposed-refinements-to-the-classification-of-self-catering-properties-for-local-tax-purposes-PDF-response.pdf](#)

⁵ [Article 4 Direction](#)

⁶ [Article 4: What is it and how will it affect property in Gwynedd? | Darwin Gray](#)

⁷ [Council calamity as second home penalties trigger price falls](#)



18. Propertymark supports the Bill's objective of aligning regulation between self-catering visitor accommodation and the private rented sector. The evidence, however, underscores that meaningful preservation of long-term housing stock will require more than legislation alone. Effective implementation and enforcement, accurate localised data, integration with broader housing supply and fiscal policies, and targeted approaches in tourism-intensive communities are all essential. Our research highlights that one-size-fits-all approaches are unlikely to work, and policies must be tailored to reflect local housing pressures, property types, and labour market dynamics.
19. In addition to regulatory measures, increasing the supply of social and affordable homes is critical to addressing long-term housing needs. Policies that support growth in the private rented sector, such as reducing the 4% surcharge on Land Transaction Tax for additional homes—which is predominantly taken up by private landlords—can also help expand the housing supply available to local residents.
20. Propertymark would be pleased to provide further evidence or briefings as the Bill progresses to support the development of policies that balance tourism, business interests, and the housing needs of local communities.

Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill

Evidence from the Association of Scotland's Self-Caterers (ASSC) and the Scottish Tourism Alliance (STA) Addendum 12th November 2025

Short-Term Let Licensing and the Growth of the Black Market

By way of a short addendum to the evidence provided on 5th November, and in response to the Chair's request for further detail on the black market, I wish to highlight a recent article in *The Herald* titled *What do short-term let convictions mean for Edinburgh 'black market'?* (27 October 2025, by Donald Turvill).

The article reports that Edinburgh has secured the first conviction for operating a short-term let without a licence, three years after the local licensing regime was introduced. The operator was fined £600 following a neighbour's complaint, with compensation awarded to the complainant. Edinburgh Council has stated that a further dozen cases are pending.

This milestone has been presented as a deterrent to unlawful operators. However, the article also raises concerns that the timescale for achieving a single conviction demonstrates how difficult enforcement is in practice, particularly given the volume of unlicensed activity thought to be operating in the city.

Importantly, the piece supports the evidence already provided to the Committee that there is now a clear and growing black market in Edinburgh. It notes:

- A rapid rise of informal platforms advertising unlicensed accommodation, particularly via Facebook groups used heavily during the summer and festival periods.
- Operators reportedly promoting cash bookings and private messaging to avoid scrutiny.
- The challenge for enforcement teams, who may only be able to verify illegal activity by directly booking accommodation themselves.
- A system that is heavily dependent on neighbour reporting rather than proactive compliance monitoring.

The article includes comment from the Association of Scotland's Self-Caterers confirming that a "burgeoning black market of unlicensed accommodation" has emerged, undermining the purpose of the regulations. It also includes testimony from a licensed Edinburgh operator who considers the black market "pretty significant" and operating year-round.

While the article highlights Edinburgh Council's view that convictions send a signal that enforcement is effective, it also questions whether a penalty of around £1,100 (fine plus compensation) will meaningfully deter operators who can earn substantially more in a single busy period.

Taken together, this reporting provides contemporary, independent evidence that:

- legitimate and safety-checked operators have been pushed out of the market,
- unlicensed and unregulated activity has not disappeared,
- and practical enforcement remains limited, slow, and reactive.

This supports the wider point made in our original submission: regulation that is disproportionate or commercially unworkable does not eliminate demand. It displaces it into informal and unregulated

channels, creating a system that is less safe for guests, harder to monitor, and damaging to compliant businesses.

Eich cyf/Your ref
Ein cyf/Our ref

Llywodraeth Cymru
Welsh Government

Andrew RT Davies MS
Chair
Economy, Trade and Rural Affairs Committee

7th November 2025

Dear Andrew,

Following [confirmation](#) of the UK Government restoring devolved responsibility over post-EU funding, I am writing to inform you, as Chair of the Economy, Trade and Rural Affairs Committee, that the Welsh Government will be launching a six-week consultation on our proposals for a new Local Growth Fund in Wales today.

The consultation document, which will be [published here](#), reflects our key objectives for this funding – raising productivity and tackling economic inequalities – which align with the UK Government's growth mission and UK Industrial Strategy and the Welsh Government's *Economic Mission*.

It also reflects the emerging evidence from our socio-economic analysis of the economy and labour market and our previous work on regional economic development with Welsh partners, including the 2020 Framework for Regional Investment in Wales, our work with the OECD, and lessons learned from legacy EU and UK funds.

I welcome the work your committee has previously done in this area, which we have considered in developing our proposals. I am pleased the approach we have agreed with the UK Government and set out in this consultation addresses many of the issues you raised in your [September 2023 report](#). For example, there is now clarity over the role of the Welsh Government which will allow us to maximise the impact of investment and ensure a greater focus on growth. With decisions returning to the Welsh Government, we can adopt a more collaborative approach to this funding, including with local government as trusted partners.

The consultation document includes a selection of potential objectives which can contribute to our ambitions to increase productivity growth and tackle economic inequalities. The funding levels will mean a need for careful prioritisation within these if we are to see measurable impacts.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Correspondence.Rebecca.Evans@gov.wales
Gohebiaeth.Rebecca.Evans@llyw.cymru

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

The consultation also seeks views on the delivery of this Fund, including national, regional, and local delivery approaches.

This month my officials will be holding four regional events to discuss our proposals with Welsh partners. The Regional Investment Steering Group chaired by Carolyn Thomas MS will also directly inform the development of proposals and we will continue to work closely with our trusted partners in local government to manage the transition from current funding streams.

I would be happy to meet with the Committee to discuss the consultation or the development of the new Local Growth Fund as work progresses over the coming months.

I will also keep the Senedd updated on developments.

Yours sincerely,

A handwritten signature in black ink that reads "Rebecca Evans". The signature is written in a cursive, flowing style.

Rebecca Evans AS/MS

Cabinet Secretary for Economy, Energy and Planning

Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

Rt Hon Peter Kyle MP
Secretary of State for Business and Trade
UK Government

10 November 2025

Dear Peter,

**Invitation to give oral evidence to the Committee on the developments in the
Welsh steel industry**

The Senedd's Economy, Trade and Rural Affairs Committee is currently examining the consequences of Tata's decision to close the Port Talbot blast furnaces and transition to electric arc furnace steelmaking. Our ongoing inquiry is considering the future of the Welsh steel industry, the impact of job losses on steelworkers and their communities, and the support being provided both by the Transition Board and through additional channels.

At the Committee's meeting on 5 November we discussed a letter we have issued to the Secretary of State for Wales inviting her to give evidence on this matter, and that we are yet to receive a reply to.

The Committee is keen to take evidence from a UK Government representative at the earliest opportunity, particularly in light of the plethora of issues that have affected the Welsh steel industry recently. As you will be aware, these include the recent announcements regarding:

- The extended Christmas shutdowns at Tata's Port Talbot, Llanwern and Trostre sites;
- The European Commission's announcement regarding potential tariffs; and
- Media reports suggesting planned UK Government grants for steel innovations projects may no longer go ahead.

As the Secretary of State with responsibility for steel, Members agreed to write to invite you to provide oral evidence to the Committee, so that the Committee is able to fully understand the UK Government's perspective on a number of key issues relating to the transition at Port Talbot and the future of the industry.

We have capacity to hold this evidence session on the 3, 11 or 18 of December, or alternatively 14, 21 or 29 January. If these dates do not work for you the committee clerk can advise your officials on other available slots.

Thank you for your attention to this vitally important issue.

I have copied this letter to Jo Stevens MP, Secretary of State for Wales.

Yours sincerely,

A handwritten signature in black ink that reads "Andrew RT Davies". The signature is written in a cursive style with some capital letters.

Andrew RT Davies MS

Chair: Economy, Trade and Rural Affairs Committee

We welcome correspondence in Welsh or English

CC: Rt Hon Jo Stevens MP, Secretary of State for Wales, UK Government

Rebecca Evans AS/MS
Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

Agenda Item 4.4



Llywodraeth Cymru
Welsh Government

Economy, Trade, and Rural Affairs Committee
Senedd Cymru,
Cardiff Bay,
Cardiff
CF99 1SN

SeneddEconomy@senedd.wales

10 November 2025

Dear Andrew,

Thank you for your letter on behalf of the Economy, Trade, and Rural Affairs Committee.

I wish to assure you I share the same concerns the Committee has raised regarding the challenges facing the steel industry in Wales and across the UK.

The Welsh steel industry is a key enabler to our manufacturing and construction sectors, and as such it is a critical foundation industry of economic and strategic importance to Wales and the UK.

The Welsh Government continues to work closely with the Tata Steel UK Transition Board and is committed to supporting the delivery of interventions to all those affected by Tata Steel's transition to greener steelmaking.

You will be aware that the national officers of all three steel unions, Community, Unite, and the GMB attend the Board and provide an important and constructive contribution to its work. I understand that the Secretary of State for Wales, the Rt Hon Jo Stevens, will address local union representation in her response to your letter in her role as Chair of the Board.

Yours sincerely,

Rebecca Evans AS/MS
Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Correspondence.Rebecca.Evans@gov.wales
Gohebiaeth.Rebecca.Evans@llyw.cymru

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Agenda Item 4.5



Rebecca Godfrey
Welsh Revenue Authority
PO Box 108
Merthyr Tydfil
CF47 7DL

11 November 2025

Andrew RT Davies MS
Economy, Trade and Rural Affairs Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

Dear Andrew,

Thank you for the opportunity to provide evidence in support of stage one scrutiny of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill at committee last week.

We said we would write to provide additional detail on the information that is required to be published on the national register and directory.

The Visitor Accommodation and Register Levy (Wales) Act 2025 requires WRA to publish:

- the name of the Visitor Accommodation Provider (VAP),
- any business name used by the VAP,
- the business address of the VAP,
- a statement as to whether the VAP is an individual, a partnership, a body corporate, an unincorporated body, or another kind of entity,
- if the VAP is—
 - a company registered under the Companies Act 2006 (c. 46), its company number, or
 - an overseas entity its overseas entity ID, and
- a statement as to whether the VAP is a charity, and if the VAP is a charity registered under the Charities Act 2011 (c. 25), its charity number.

This will be available from Autumn 2026.

The Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill will require the published directory to contain:

- the name of the VAP;
- any business name used by the VAP;
- the business address of the VAP;
- the regulated visitor accommodation to which the licence relates;
- the premises to which the licence relates;
- the registration number issued by WRA to the VAP
- the date the licence was granted and, where applicable, amended or renewed;
- the date on which the licence will expire;
- such information in relation to the approval requirements or the licence conditions, as the Welsh Ministers consider appropriate.

But the published directory must not contain the name of an individual, unless the individual consents to the publication, or the individual's forename and surname are part of the business name of a VAP. Similar restrictions to the publication of the address of an individual's sole or main residence apply, unless the individual consents to the publication, or the address is of premises at which a VAP provides, or offers to provide, regulated visitor accommodation.

Finally, the committee is very welcome to visit our office to see how the work to develop the national register (which is the predecessor to the directory) is progressing. And we are very happy to return to the committee at a later date to provide further evidence as our work on this continues to develop, if that would be helpful.

Yours sincerely,



Rebecca Godfrey

Interim Chief Executive Officer



Llywodraeth Cymru
Welsh Government

Ein cyf/our ref: MA/HIDCC/1447/25

Andrew RT Davies, MS
Chair,
Economy, Trade, and Rural Affairs Committee
Senedd Cymru
SeneddEconomy@senedd.wales

11 November 2025

Dear Andrew,

I wish to inform the Committee of the intention to consent to the Secretary of State making and laying the Biocidal Products (Data Protection Periods) (Amendment) Regulations 2025 (“the Regulations”). The Regulations will be made using powers in articles 83A(2) and 89(2)(b) of Regulation (EU) No 528/2012 of the European Parliament and of the Council concerning the making available on the market and use of biocidal products (“the Great Britain Biocidal Products Regulation” or “GB BPR”).

The Regulations amend the date set out in article 95(5) of GB BPR on which regulatory data protection for active substances (those substances which produce the biocidal activity of a product) ends, from 31 December 2025 to 31 December 2030. It also makes amendments to update references to Regulation (EC) No 1451/2007 in article 95(3) and (5) of GB BPR to Regulation (EU) No 1062/2014 which superseded it.

By virtue of article 95(5) of GB BPR, the data protection period for approximately 300 active substance/product type combinations included in the GB Review Programme of existing active substances, but on which an approval decision has not yet been reached, will end on 31 December 2025. This would mean that those active substances which are yet to be reviewed would receive no data protection after that time.

As a result, active substance manufacturers or those supporting their approval would no longer be able to charge other companies to use their data after 31 December 2025, preventing them from recovering any of the costs of commissioning the data. Although the consequences of not amending article 95(5) are difficult to predict, there is a significant risk it would lead to companies withdrawing their active substances from the GB market because they are no longer financially viable. This would have knock on impacts on the pest control, transportation and water treatment sectors and could increase public health and safety risks.

Article 60 of GB BPR provides that where data has been protected under GB BPR, once that protection has expired the data cannot be protected again. To avoid data protection

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Huw.Irranca-Davies@llyw.cymru
Correspondence.Huw.Irranca-Davies@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

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ending for active substances in scope, the period in article 95(5) of GB BPR is being extended by five years to 31 December 2030.

In accordance with articles 83B and 89(4) of GB BPR, the Secretary of State has approached the Welsh and Scottish Ministers for consent to the Regulations.

Although the Welsh Government's general principle is that the law relating to devolved matters should be made in Wales, on this occasion, it is considered appropriate for the Secretary of State to legislate on a GB-wide basis, as Welsh Ministers do not have the powers and a GB-wide approach ensures timely implementation and policy continuity.

There is no policy divergence between the Welsh and UK Government in this matter, and the Regulations amend legislation that was not made bilingually.

The Regulations will be laid before the UK Parliament on 26 November.

I have written similarly to the Chair of the Chair of the Legislation, Justice and Constitution Committee.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Huw Irranca Davies', written in a cursive style.

Huw Irranca Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd a Materion
Gwledig Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Economy, Trade, and Rural Affairs Committee
Senedd Cymru,
Cardiff Bay,
Cardiff
CF99 1SN

SeneddEconomy@senedd.wales

11 November 2025

Dear Andrew

I thank the Economy, Trade and Rural Affairs Committee for their interest in the recent signing of the UK-India Comprehensive Economic and Trade Agreement (CETA). India is an important partner and market for Wales. This agreement has the potential to further increase the trade opportunities for Welsh businesses once it is fully implemented.

My officials are in the progress of drafting the Welsh Government's perspective and the implications of this agreement for Wales. It remains our intention to publish this report early next year to coincide with the UK Government's CRAG (Constitutional Reform and Governance Act) process prior to the UK's ratification of the agreement for entry into force. I will keep this committee updated on progress and publication of the report should it be delayed due to other trade related activities taking place, such as with the EU and US.

On the three questions you have raised on the CETA, more detailed responses will be contained within the final perspectives report. In the meantime, I can provide the Committee with an early initial response to these questions.

In relation to the assessment of the key impacts, as the CETA is not yet in force, a true assessment of the value of this agreement is difficult to provide, especially as it will depend on utilisation of the agreement by businesses. Although modelling results from the UK Government suggest that the agreement could increase GVA in Wales by approximately £80m (0.11%) in the long run, in real terms. Given the lack of granular trade data published for Wales, it will not be possible to conduct or commission our own economic modelling of the final deal. However, we do not believe the outputs would vary significantly from those produced by UK Government. Our full assessment of the impact of the agreement on Wales will be available in our upcoming report.

The final perspectives report will detail the compatibility of CETA with our own ambitions, as set out in our approach to trade policy paper. However, early findings have indicated that

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Correspondence.Rebecca.Evans@gov.wales
Gohebiaeth.Rebecca.Evans@llyw.cymru

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

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there are some alignments in this area, such as the inclusion of the environment and gender chapters, and animal welfare provisions, within CETA.

Although the UK-India CETA will have some implications on the trade of steel, much of this will depend on how the agreement will be utilised by businesses. The lowering of tariffs on certain steel products by India provides an opportunity for UK and Welsh steel producers to potentially access the, albeit a heavily saturated, India market. The UK market access for steel from India has not fundamentally changed as a result of CETA. However, other UK domestic policies, such as the expiry of the UK steel safeguards and the UK Carbon Border Adjustment Mechanism may result in changes in the trade of steel between UK and India, but this is not as a result of the agreement itself.

Finally, I would like to take the opportunity to assure the Committee that a copy of the Welsh Government perspectives report will be provided once it has been finalised.

Yours sincerely,



Rebecca Evans AS/MS

Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio



Ein cyf/Our ref: HID-PO-575-25

Mike Hedges MS
Chair
Legislation, Justice and Constitution Committee
Senedd Cymru

11 November 2025

Dear Mike,

I am writing to inform you that the Independent Intergovernmental Relations (IGR) Secretariat has now published its annual reports covering the periods 2022–2023 and 2023–2024. These reports have been prepared using existing published information drawn from supporting documents; published Communiqués and quarterly transparency reporting on the [gov.uk web pages](#). As these are independent reports, we have reviewed them solely for factual accuracy. These reports can be accessed [here](#).

As previously notified, the Welsh Government previously published its own IGR Overview reports covering the same periods, in line with the [Inter-Institutional Relations Agreement](#) as laid before the Senedd on 18 November 2021. These reports can be accessed [here](#).

I have copied this letter to the Chairs of the following Senedd Committees: Children, Young People and Education; Climate Change, Environment, and Infrastructure; Culture, Communications, Welsh Language, Sport, and International Relations; Economy, Trade and Rural Affairs; Equality and Social Justice; Finance; Health and Social Care; and Local Government and Housing.

Yours sincerely,

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Huw.Irranca-Davies@llyw.cymru
Correspondence.Huw.Irranca-Davies@gov.wales

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Mark Drakeford MS
Cabinet Secretary for Finance and Welsh Language

12 November 2025

Dear Mark,

Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill

Thank you for appearing before Committee on 10 November 2025 to discuss the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill ("the Bill").

During the session you agreed to respond to some questions that we asked during the session in writing. We would also be grateful if you could respond to some additional questions to support our scrutiny of the Bill. These questions are set out at annex A.

Please could you respond no later than 21 November?

I have copied this letter to the Chair of the Economy, Trade and Rural Affairs Committee.

Yours sincerely,



Mike Hedges
Chair

Annex A: Questions to the Cabinet Secretary for Finance and Welsh Language re. the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill

Legislative consent

1. Does the Government consider that any of the provisions of the Bill require the consent of HM The King or the Prince of Wales? If so, when do you anticipate that any required consents will be received?

Development of the Bill

2. The Explanatory Memorandum refers to a “paucity of reliable data currently available” regarding the number of self-catering lets available in Wales and “no data available on the characteristics of premises or levels of compliance with the existing statutory obligations”. Why did you conclude that the Bill is needed?

3. You stated in Committee that:

“The Bill has been consulted upon in one way or another in every single year of this Senedd term. There have been a long series of opportunities particularly with the industry itself to make sure that the Welsh Government was made aware of people’s views and to adapt the proposals to take account of that.”

What opportunity, if any, have stakeholders been given to comment on specific proposals as they appear in the Bill?

4. Did you consider delaying bringing forward the Bill until after the implementation of the registration regime established by Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025?
5. In Committee, you stated that “the vast bulk of licenses will be issued through as automatic a process as possible by the Welsh Revenue Authority”, but that, “In the minority of cases where a more direct form of inspection or intervention is needed”, the Bill leaves it open for the Welsh Government to work with local authorities or with Visit Wales to physically inspect premises. Why hasn’t this been clarified in advance of the Bill being introduced, and why has this not been included in more detail on the face of the Bill?

Delegated powers

6. During our meeting on 10 November, in response to a question about whether the Bill strikes the right balance between what is on the face of the Bill and what is provided for in terms of delegated powers, you stated that:

"Sometimes there are things where you might put something on the face of the Bill that actually create a straitjacket for the industry, and where regulations allow a different level of engagement with the industry. Most of the regulations we are talking about will be subject to consultation further to Senedd affirmation, and where the flexibility the regulations allow means that the Bill and its requirements will work better for the industry itself. Sometimes there've been choices between the two aspects you've suggested where my view was I'd resolve them in favour of what I think works for the industry, rather than the clarity that I know the Senedd would sometimes like to see..."

Please can you provide us with any examples of specific provisions in the Bill that either reflect requests from the tourism industry to defer detail to regulations rather than placing it on the face of the Bill, or that support your belief that this would be their preferred approach?

7. Please could you explain the Government's justification for taking the Henry VIII powers in the following sections:
- a. Section 6(2)
 - b. Section 17(1)
 - c. Section 19(3)
 - d. Section 25(2)
 - e. Section 49
 - f. Section 56(1)

Clarity and effect of proposals

8. The Bill states that it will form part of a code of Welsh law relating to tourism. We note your comments and the comments of your official made on 10 November. In relation to the proposed code you stated that the code will make relevant law relating to tourism "available in one place", and your official later stated that "everything is published together in one place, and described as a code". From a practical point of view:

- a. Where can a user find a standard definition of what the Welsh Government means by a code?
 - b. What changes, if any, will legislation.gov.uk make to their website so that a user knows that a tourism code exists, whether legislation is part of that code, and how to find other legislation that is part of the same code?
9. Section 39(4) of the Bill provides that disclosure of information between the Welsh Ministers and the list of bodies in subsection (3) does not breach obligations of confidence or “any other restriction on the disclosure of information (however imposed)”. What types of restriction would this provision override and why is it necessary?
10. Section 46 prohibits advertising or marketing visitor accommodation at premises without including certain information in a manner and form specified by the Welsh Ministers. How will those requirements be specified in practice and why did you decide not to specify requirements in regulations?
11. Section 47 creates an offence for failing to comply with the requirements for advertising visitor accommodation in section 46. Could a letting agent or online booking platform be criminalised for non-compliance with section 46? Or just a visitor accommodation provider?

Other questions

12. Why has the Cabinet Secretary chosen not to include a provision on the face of the Bill that requires the Welsh Ministers to undertake a post-implementation review?
13. Are you expecting to bring any particular amendments to the Bill forward at Stage 2?
14. Should the Bill be passed and enacted, when do you envisage the licensing scheme being implemented?

Rt. Hon. Elin Jones MS
Llywydd, and Chair of the Business Committee

14 November 2025

Annwyl Lywydd,

**Business Committee review of the Public Bill and Member Bill processes:
publication of pre-introduction Bills**

Thank you for your letter of 10 October relating to the Welsh Government's recent practice of publishing pre-introduction versions of Bills introduced during Year 5 of the Sixth Senedd.

The Economy, Trade and Rural Affairs Committee has recently started its Stage 1 scrutiny of the general principles of the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill, a pre-introduction version of which was published around four weeks prior to the Bill's formal introduction to the Senedd.

As you will be aware, the Committee is working with an unusually short timetable for scrutiny, with seven sitting weeks for evidence gathering and drafting its report. On this occasion, the publication of the draft Bill was therefore particularly useful to the Committee in the following ways:

- The preparatory work that was able to take place in advance of the Committee's formal work: the Committee was able to make initial approaches to key stakeholders in the knowledge that they had access to a draft version of the Bill and would therefore be more informed than they might otherwise have been.
- A technical briefing that was held with Welsh Government officials ahead of the Bill's formal introduction: this could be carried out with Members already having access to the draft content of the Bill, and therefore did not take up time that could be used for scrutiny following the Bill's formal introduction.

A further help to the Committee's work, while not directly linked to your request, was the Welsh Government's willingness to work with the Committee to identify stakeholders with whom the draft Explanatory Memorandum could be shared. This flexibility was welcome and again enhanced the value of making initial approaches to stakeholders ahead of formal scrutiny.

A potential disadvantage to the approach of publishing pre-introduction versions of Bills is the changes made during the pre-introduction period, which could impact some of the decisions and preparatory work being carried out. However, it is possible to mitigate this risk by being clear that the pre-introduction version of a Bill is not the final iteration and should always be checked against the final version as introduced.

Overall the approach of publishing pre-introduction versions of Bills is welcome and the flexibility shown during the approach to the Development of Tourism and Regulation of Visitor Accommodation (Wales) Bill is practice that should be encouraged and continued whenever possible.

However, I would stress that the publication of pre-introduction versions of Bills should in no way be a substitute for a full and proper timetable for Stage 1 scrutiny and should only serve to complement that work.

Thank you again for the opportunity to feed into this important piece of work.

Yours sincerely,

A handwritten signature in black ink that reads "Andrew RT Davies". The signature is written in a cursive style with some capital letters.

Andrew RT Davies MS

Chair: Economy, Trade and Rural Affairs Committee

We welcome correspondence in Welsh or English



The Rt Hon Mr Alistair Carmichael MP
Chair of the Environment, Food and Rural Affairs Committee
UK Parliament

17 November 2025

Dear Alistair,

Banning peat compost

The Senedd's Economy, Trade and Rural Affairs Committee is concerned about the use of peat in compost. You will be aware of absolute need to protect our peatlands and the immense environmental harms caused by peat compost.

Recently we asked the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs about any plans to introduce a ban on the sale of compost containing peat and he told us "We still believe that the best way to do this ... is on an England and Wales basis." He went on to explain that "UK Government is committed to doing this. What they've got to find, what they've got to persuade ... No. 10 and ... the Cabinet, is that they need an urgent legislative slot."

I note that there is broad political support for a ban on peat compost, with both the previous UK Government and the Scottish Government both supporting the idea of a ban. I also note that your colleague Sarah Dyke MP has introduced a Private Members Bill on the issue.

It seems clear to me that despite the environmental importance and wide support, this issue seems to be firmly on the back burner. So, I am writing to ask whether your Committee might consider undertaking some work on this matter to help increase political pressure and advance the ban? I would also be keen to explore if there are any opportunities for collaboration, within the limited time frame we have until the Senedd election, to ensure it receives appropriate attention.

I have copied this letter to Edward Mountain MSP, Convener of the Scottish Parliament's Net Zero, Energy and Transport Committee.

Yours sincerely,

A handwritten signature in black ink that reads "Andrew RT Davies". The signature is written in a cursive style with some capital letters.

Andrew RT Davies MS

Chair: Economy, Trade and Rural Affairs Committee

We welcome correspondence in Welsh or English

CC: Edward Mountain MSP, Convener of the Scottish Parliament's Net Zero, Energy and Transport Committee

Rebecca Evans MS
Cabinet Secretary for Economy, Energy and Planning

17 November 2025

Dear Rebecca,

EU-MERCOSUR Free Trade Agreement

The Committee has been considering the EU-Mercosur Partnership Agreement. The Committee has noted some concerns from the agriculture sector about the potential knock-on effects on UK agricultural producers.

As a result of the Agreement, there is concern that Wales' agriculture and food production sectors could face:

- Increased competition within the EU market from cheaper Mercosur imports;
- Increased competition within the UK from EU producers looking to sell displaced products on the UK market; and
- Increased price competition from EU farmers able to access cheaper soybean and other animal feed from Mercosur states.

Please could you set out what considerations have been given to the effect of the Agreement on Wales and set out any commentary and analysis on the potential impacts of the trade agreement on Wales. We are particularly interested in any analysis on the impact for our farmers and food producers?

Please can you also outline:

- Any discussions with or feedback you have had from stakeholders regarding the Agreement including in bilateral and Ministerial Forums such as the Trade Policy Advisory Group; and
- Any discussion you have had with the UK Government regarding the Agreement, particularly regarding any measures that need to be taken as a result of the agreement.

Thank you in advance for your response.

I have copied this letter to the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs as it also relates to his remit.

Yours sincerely,

A handwritten signature in black ink that reads "Andrew RT Davies". The signature is written in a cursive style with some capital letters.

Andrew RT Davies MS

Chair: Economy, Trade and Rural Affairs Committee

We welcome correspondence in Welsh or English

CC: Huw Irranca-Davies MS, Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs