

# Written Evidence Submission to the Senedd Cymru Tourism Committee

**From:** Mid Wales Tourism (MWT Cymru)

**Date:** 7<sup>th</sup> Nov 2025

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

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## 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.

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## 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.

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## 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

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