



## **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**