Pre-Budget Submission 2020

SAFEGUARDING THE IRISH RESTAURANT AND TOURISM INDUSTRY IN ADVANCE OF BREXIT

Presented to:
Minister for Finance & Public Expenditure and Reform
Paschal Donohoe, T.D.

RESTAURANTS ASSOCIATION
OF IRELAND

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INTRODUCTION by JIM POWER - ECONOMIST

ABOUT THE RESTAURANTS ASSOCIATION OF IRELAND

The Restaurants Association of Ireland is the representative body for restaurants in Ireland. With over 2,700 business owners nationwide, we represent fine dining, casual dining, ethnic, family, gastro pubs, and hotel restaurants. Established by restauranteurs in 1970 to represent the sector at governmental level and promote and improve the industry, the Restaurants Association of Ireland continues with that mandate to this day.

THE RESTAURANT INDUSTRY IN IRELAND

The Accommodation and Food Services sector employed 175,000 workers in the first quarter of 2019, which is equivalent to 7.6 per cent of total employment in the economy. This is made of 53,300 employees in the Accommodation sector and 121,700 in Food & Beverage Activities. The sector has delivered the second strongest employment growth of any other sector since the bottom of the labour market in 2012. Between 2012 and the first quarter of 2019, employment in the sector increased by 53,900, equivalent to a growth rate of 44.5 per cent.

In Budget 2019, the Minister for Finance increased the VAT rate for the hospitality sector from 9% to 13.5%. This was effective from 1st January 2019. At a time when the sector is facing a number of challenges from rising input costs, adverse exchange rate movements, intense Brexit-related threats and uncertainties, skills shortages, and general pressure on margins, this move is intensifying pressures on the sector.

The operating environment for the restaurant sector is very challenging. The still-stretched Irish personal sector is extremely resistant to higher prices; cost pressures continue to increase on all fronts; labour shortages are becoming a very significant challenge; visitor numbers from the UK are under pressure from a combination of sterling weakness, Brexit uncertainty and a slower UK economy; and the growth in overseas tourist numbers is coming from a cohort of visitors who tend to spend more sparingly than UK visitors.

It is very clear that the competitiveness of Irish tourism is being threatened by exchange rate developments that are outside of Ireland's control. Hence, it is essential that other aspects of the competitiveness of Irish tourism are protected and nurtured. It is crucial that the cost competitiveness of the sector is preserved to the greatest extent possible. This is not happening.

The restaurant sector is a key element of Ireland's tourism offering. Having a high-quality and affordable restaurant offering is of vital importance to the success of the tourism sector, which is a major provider of jobs around the country.

The decision to increase the VAT rate in Budget 2019 was ill-timed and mistaken, and it is having a negative impact on many seasonal businesses who are already operating with very tight margins in what is a very competitive environment. Consideration should be given to a re-instatement of the special VAT rate for a sector that is such a significant employer all over the country.

1) THE RESTAURANT SECTOR VAT RATE

The restaurant sector is a key component of the Accommodation and Food Services sector. There are over 3,500 restaurants in Ireland, employing over 70,000 people. It is estimated that the sector contributes over €2.2 billion per annum to the Irish economy in terms of wages and purchases of inputs. The sector is also a significant employer of part-time workers, particularly students. Restaurants represent a crucial element of Ireland's tourism offering.

There has been significant growth in overseas visitor numbers to Ireland in recent years. However, the environment is becoming more difficult. Overall visitor numbers increased by 3.6 per cent in the first six months of 2019, but the Great Britain market is becoming more challenging. Visitor numbers from Great Britain increased by 0.5 per cent in the first six months of the year, but in May and June, there was a combined decline of 2.9 per cent. This reflects sterling weakness, a more difficult UK economic environment and intense Brexit uncertainty.

In the aftermath of the economic crash, prices fell sharply in the accommodation and food services sectors as businesses struggled to maintain business volumes. This has changed over the past five years. Between 2014 and 2018, the average costs of accommodation increased by 25 per cent and the average cost of restaurants, cafes, fast food & take-away food increased by just 6.6 per cent. Pricing power in the restaurant sector is constrained in what is a very competitive environment.

Following the increase in the VAT rate on January 1st 2019, the average cost of dining in restaurants, cafes, fast food & take-away food increased by 2 per cent during the month of January. In the first six months of 2019, the average cost of accommodation increased by 3.2 per cent on the first half of 2018 and the average cost of dining in restaurants, cafes, fast food & take-away food increased by 4.9 per cent. Restaurants had no choice but to pass on the VAT increase as margins are so tight. Larger hotels in particular who have seasonally adjusted room rates that peak in times of demand were in a position to absorb the VAT increase.

The tourism performance was very strong in 2018. 10.6 million overseas visitors came into the country, which was 6.9 per cent ahead of 2017. The UK market expanded by just 0.8 per cent, but North America and Europe experienced very strong growth, growing by 13.4 per cent and 9.5 per cent respectively. Growth has continued in 2019, but it is becoming more challenging. Visitor numbers increased by 3.6 per cent in the first six months of the year, but the Great Britain market is becoming particularly more challenging. Visitor numbers from Great Britain increased by 0.5 per cent in the first six months of the year, but in May and June, there was a combined decline of 2.9 per cent. This reflects sterling weakness, a more difficult UK economic environment and Brexit uncertainty.

Table 1 Overseas Visitors to Ireland

REGION	2018	% CHANGE	JAN-JUNE 2019	% CHANGE
Great Britain	3,759,000	+0.8%	1,794,400	+0.5%
Other Europe	3,812,700	+9.5%	1,834,900	+2.8%
North America	2,383,800	+13.4%	1,113,400	+9.1%
Other Areas	660,700	+6.7%	305,900	+8.1%
Total	10,616,300	+6.9%	5,048,600	+3.6%

Source: CSO, Overseas Travel, July 25th 2019.

We await the full Q2 results for Overseas Trips to Ireland, expected to be released in September 2019, however whilst trips increased in both Q1 and Q2 the number of nights and spend by tourists for Q1 makes for some concerning reading which should be heeded.

OVERSEAS TRIPS TO IRELAND FOR THE PERIOD JANUARY TO MARCH 2019

- The number of overseas trips to Ireland by non-residents increased from 1.921 million in Quarter 1 2018 to 2.027 million trips in Quarter 1 2019 (+5.5%), however when segmented to Holiday/ Leisure/Recreation trips have increased by 3.89% versus same period last year.

Table 2 Number of bednights spent in Ireland by non-residents on overseas trips cross classified by type of accommodation used and area of residence, Quarter 1 2018 and Quarter 1 2019

	AREA OF RESIDENCE									
Bednights	**Great Britain**		**Other Europe**		**USA & Canada**		**All Other Areas**		**Total**	
Type of accommodation used	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019
Hotel	875	914	1,125	1,222	757	921	279	256	3,036	3,313
Guest House/B&B	163	165	637	433	262	283	120	98	1,182	979
Rented House/ Apartment	232	156	1,073	1,138	265	212	645	458	2,214	1,964
Friends/ Relatives	1,268	1,298	1,234	1,169	438	489	648	795	3,588	3,750
Other	540	435	1,329	1,137	323	253	272	250	2,464	2,074
Total	**3,079**	**2,968**	**5,397**	**5,098**	**2,045**	**2,157**	**1,963**	**1,857**	**12,484**	**12,081**
	-4%		-6%		5%		-5%		-3%	

- The number of nights spent in Ireland by overseas travellers **decreased** by 3.2% in Quarter 1 2019 compared with the same period of the previous year, down from 12.5 million to 12.1 million.

Table 3 Estimated average length of stay (nights) by non-residents on all overseas trips to Ireland cross classified by area of residence and reason for journey, Quarter 1 2018 and Quarter 1 2019

	REASON FOR JOURNEY									
Average length of stay	Business		Visit to Friends/ Relatives		Holiday/ Leisure/ Recreation		Other		Total	
Area of Residence	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019
Great Britain	3.0	2.6	5.2	5.3	3.5	3.3	1.9	1.5	3.9	3.7
France	6.1	7.4	8.2	8.1	6.0	5.0	23.2	18.8	9.1	7.9
Germany	7.0	5.0	6.6	8.3	5.7	5.1	17.3	14.0	7.5	6.7
Italy	7.9	19.6	7.6	9.5	3.6	5.5	16.0	12.3	6.9	9.4
Other Europe	10.4	8.7	7.4	7.2	5.5	4.7	13.5	6.2	8.0	6.4
USA & Canada	4.7	5.2	8.6	9.4	6.6	6.3	3.9	2.7	6.2	5.9
All other areas (incl. Australia & New Zealand)	15.9	9.9	17.6	17.5	9.2	10.4	36.5	29.4	17.5	15.4
Total	**5.9**	**5.3**	**7.1**	**7.5**	**5.2**	**4.9**	**10.5**	**7.0**	**6.5**	**6.0**
	-10%		6%		-6%		-33%		-8%	

- The average duration of overseas trips to Ireland **dropped** from 6.5 nights in Quarter 1 2018 to 6.0 nights in Quarter 1 2019 an 8% drop.

Table 4 Total expenditure (excl fares) by non-residents on overseas trips to Ireland cross classified by area of residence and reason for journey, Quarter 1 2018 and Quarter 1 2019

	REASON FOR JOURNEY									
Average length of stay	Business		Visit to Friends/ Relatives		Holiday/ Leisure/ Recreation		Other		Total	
Area of Residence	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019	Jan-Mar 2018	Jan-Mar 2019
Great Britain	56	57	62	56	83	77	5	5	206	195
France	9	8	7	6	24	23	9	6	48	43
Germany	11	12	8	5	29	27	7	9	55	53
Italy	5	5	3	4	16	12	6	5	30	25
Other Europe	36	45	33	32	56	54	27	17	151	148
USA & Canada	32	24	35	33	114	130	14	13	194	200
All other areas (incl. Australia & New Zealand)	21	16	33	43	29	28	27	13	110	99
Total	**169**	**167**	**181**	**178**	**350**	**350**	**95**	**67**	**795**	**763**
	-1%		-2%		0%		-29%		-4%	

- Total tourism and travel earnings from overseas travellers to Ireland decreased by 4.6% between Quarter 1 2018 and Quarter 1 2019, decreasing from €1,079 million to €1,029 million. When fares are excluded, total expenditure decreased from €795 million to €763 million, a decrease of 4.0% over the period.

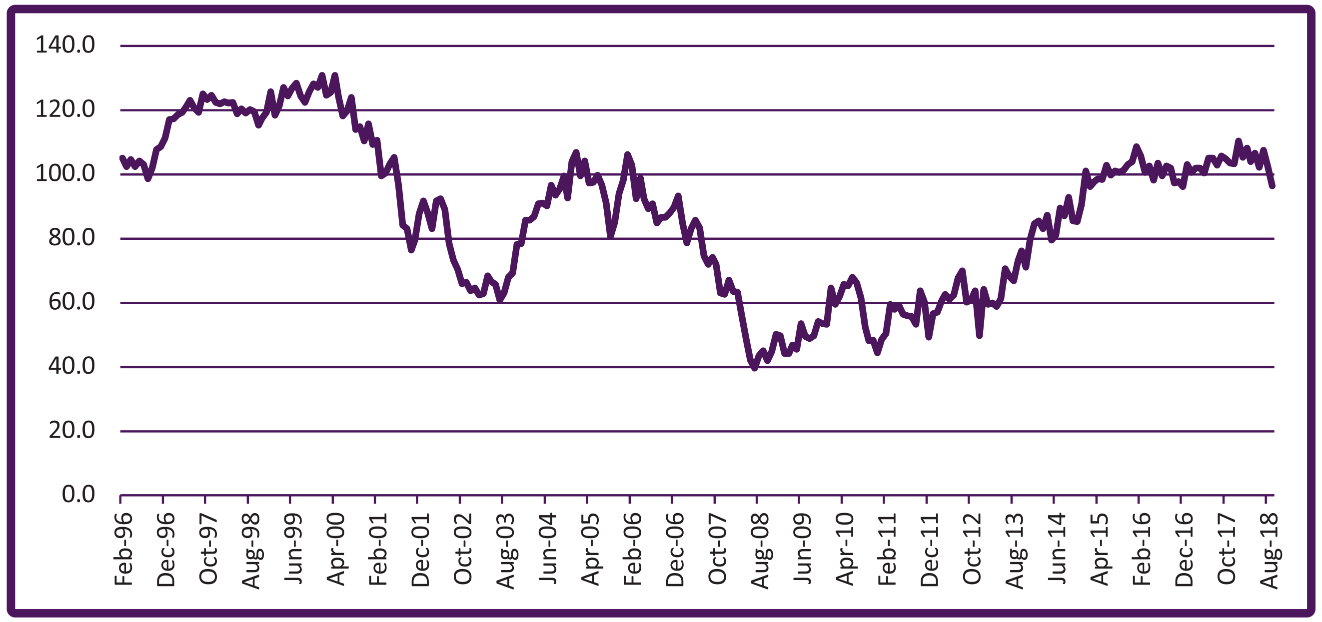
THE CONSUMER

In the first 6 months of the year, the volume of retail sales - which is spending on physical goods and accounts for under 40 per cent of total consumer spending - increased by 2.3 per cent, but the value of those sales increased by just 1.5 per cent. Car sales are a particularly weak component of retail sales, and when they are excluded, the volume of retail sales expanded by 4.7 per cent and the value growth was 3.2 per cent. The gap between volume growth and value growth has been a clear trend in recent years and is a challenge for consumer-facing businesses. It is indicative of the price resistance of consumers and the incessant search for value for money. While consumer spending is improving, the personal sector is still stretched.

The personal sector is still financially pressurised due to a combination of flat wages at best for the past decade; the income tax burden on tax-paying workers increased significantly as a result of the post-crash fiscal correction measures; housing costs are soaking up an increasing level of household expenditure, particularly for a certain age segment of the population; and of course Brexit is justifiably engendering a heightened level of nervousness. The upshot of all of these factors and possibly others is that consumer-facing businesses are dealing with a personal sector that is resistant to higher prices and retail pricing power is limited.

The challenged nature of the personal sector is reflected in consumer confidence surveys. Having recovered strongly from the lows of the recession, consumer confidence has plateaued over the past couple of years and has become quite fragile so far in 2019.

CONSUMER CONFIDENCE



Source: ESRI/KBC Bank, May 2nd 2019.

The ESRI consumer confidence survey ceased publication in early May, but other surveys of consumer confidence are still suggesting a cautious consumer mood. Nielsen's consumer confidence survey showed a modest rebound in the second quarter due to the Brexit extension. However, readiness to spend remains challenged and consumers are still looking to save on household expenses. The willingness to spend on out-of-home entertainment declined modestly in the second quarter.

VAT RATES WITH THE EU

HOTREC – is the umbrella Association of hotels, restaurants, bars, cafes and other similar establishments in Europe. It brings together 43 national associations in 30 different countries and is the voice of the hospitality industry in Europe. The sector consists of around 2 million businesses, provides 11.9 million jobs and is the 3rd largest industry in Europe.

HOTREC WHITE PAPER FEBRUARY 2019

Regarding tourism taxation – "Reform the VAT scheme while continuing to allow for low rates for hospitality services The European Commission proposed to amend the rules setting VAT rates in the European Union. It is essential that Member States continue to be able to apply reduced VAT rates to hospitality businesses, which proved to create jobs and growth as showed the HOTREC VAT report published in April 2017. This is also key for the competitiveness of Europe as a tourist destination, which growth of international tourism receipts lag behind growth rates of the world average. The European Commission and the European Parliament are both supporting this approach which still needs to be adopted by the Council"

12 countries within the European Union have different or a split VAT rate between hotel accommodation and restaurants.

- Belgium
- Bulgaria
- Estonia
- Greece
- Croatia
- Latvia
- Lithuania
- Hungary
- Malta
- Portugal
- Slovakia
- Finland

Of the countries with a combined rate (some exemptions within the categories apply) for both hotel accommodation and restaurants, 12* have a lower VAT rate for Hotel Accommodation and Restaurants than Ireland. Details of the rates are in the table below.

Category	Spain	France	Italy	Cyprus	Luxemburg	Netherlands	Austria	Poland	Portugal	Romania	Slovenia	Sweden
Hotel Accommodation	10	10	10	9	8	9	10	8	6	5	9.5	12
Restaurants	10	5.5/10	10	9	8/17	9	10	8/23	13	5	9.5/22	12

**Note whilst Portugal does not have a combined rate of VAT, both its Hotel Accommodation and Restaurant rates of; 6% and 13% respectively are lower than the current Irish VAT rate of 13.5%*

ACTION

- Reduce the VAT Rate for restaurants back to 9% to enable recovery akin to that within the hospitality / accommodation sector
- Review Restaurant & Hospitality rate if hard / disorderly Brexit occurs to safeguard one of the country's largest employers and ensure our tourism offering remains competitive at an EU level

2) HOSPITALITY SKILLS AND RECRUITMENT

Since 2012, the Restaurants Association of Ireland have been calling for policies to tackle the chronic chef shortage in Ireland.

Currently, 1,800 chefs qualify each year from certified culinary training programmes. In 2015, the Expert Group on Future Skills Needs (EGFSN) report on the Hospitality sector identified a deficit of 5,000 chef trainees annually. We are now almost 4 years on from the publishing of that report and numbers are estimated at almost 7,500. The key findings of the EGFSN report were that the skills shortage is across all levels, most notably amongst Chefs. It is also worth noting that the report of 2015 makes recommendations to 2020. Given recent economic developments and the fact that full employment has now been reached there is most certainly a need for the Group to meet again to compile the next report for beyond 2020.

REASONS FOR THE SKILLS SHORTAGE ARE AS FOLLOWS;

- Insufficient numbers with appropriate training & experience
- Lack of appropriate training centres and courses
- Perception of careers in the sector
- Seen as a casual labour sector with no career ladder where the opposite is true
- Reputation of the sector
- Lack of Continuous Professional Development
- Societal Focus on more traditional 3rd level progression post Leaving Certificate
- Colleges unable to provide sufficient amount of on the job training hours

POLICIES IMPLEMENTED TO TACKLE THE SKILLS SHORTAGE AND THE REASONS ABOVE;

- Development of National Commis Chef Apprentice Programme (112 places were rolled out in October 2017) (2 days college, 3 days employment x 2 years).
- Development of National Chef de Partie Programme - of which RAI is the Chair – commenced September 2018 in two IOTs with approx. 40 registered – another intake commenced in Jan 2019 in 4 IOTs – an earn and learn degree qualification programme.
- Development of National Sous Chef and Executive Head Chef apprenticeship programmes.
- Establishment of a Restaurant & Hospitality Skillnet in 2017 by the RAI - to provide upskilling courses to those currently working in industry.
- Establishment of a National Oversight and Advisory Group 'Hospitality Skills Oversight Group'.
- Apprentice Chef Initiative – aims to create a positive and pro-active approach and introduction to culinary arts profession for second level students.
- Tourism Insights – online portal for transition year students to promote careers in tourism and hospitality. Over 240 schools have participated to date.
- Ireland Skills Live – showcasing in an exciting and dynamic way, apprenticeships or skills as a future career pathway.

The White Paper – was presented by HOTREC to the EU Parliament in February 2019, and includes a 2019-2024 EU MANDATE: which includes 5 Priorities for EU Policy and Decision – Makers, one of those 5 priorities is:

"Social Affairs - Skills: Make the fight against skills shortage a truly EU case.

Despite the fact of representing 2 million businesses, 90% of which are micro- enterprises, and 11.9 million jobs, the hospitality sector strives to attract and retain workers. Technological changes have created new needs for digital skills to respond to customers' demands and to be more visible online.

Societal change also drives new demands, for instance in food services, were qualified chefs are missing. In fact, while the average job vacancy rate is of 1.7% in the EU, in the accommodation and food service sector, it reaches 3% in Belgium, 4.4% in Germany, 7.4% in Greece. A strong EU policy should be set-up to help the tourism industry to innovate, attract, train and retain the workforce. Solutions pass through EU funding able to finance massive trainings (e.g. on digital, interpersonal skills, languages); the promotion of quality, cost-effective and attractive apprenticeship schemes and vocational education and training (VET); advertising existing tools (e.g. European Hospitality Skills Passport, which enables employers and job seekers match on the labour market); facilitating the transition from education to work to meet the labour market demand; anticipating and detecting emerging skills needs.

At the same time, the EU should secure the possibility of using flexible working arrangements, to help the industry face the challenge of seasonality and the fact that customers expect hospitality business to be open outside normal working time, week-ends included. All in all, the EU Institutions should support the launch of multi- stakeholder campaigns to improve the image of the hospitality and tourism sectors."

APPRENTICESHIPS

The two active culinary apprenticeships of Chef de Partie and Commis Chef, do not operate the same as other apprenticeships – there is no bursary as with trade apprenticeship and industry, i.e. the employer pays the employees while they are on site working and also while they are off-site learning / training.

Currently for apprenticeships developed before 2016, a training allowance is paid by the local Educational, Training Board (ETB) to apprentices while attending off-the-job training. In some cases, a contribution towards travel or accommodation costs may be paid if deemed eligible. The sector the apprentice's employer is engaged in will determine the allowance payable. Current applicable apprenticeships are;

Engineering, Construction, Motor, Printing & Paper, and Electrical Industry

This means within ETBs students in the Culinary Sector are at a marked disadvantage compared to their counterparts training in other industries.

The Joint Committee on Business, Enterprise and Innovation Report on: “The Role of Apprenticeships and Work Permits in Addressing Ireland’s Skills Needs” published in May 2019 observed and recommended the following regarding apprenticeships: “The Committee notes that post-2016 apprenticeship programmes do not receive the same level of financial support from the State for off-site training as the pre-2016 apprenticeship programmes. The Committee notes that block release apprenticeships can be particularly problematic for SMEs. The Committee recommends that the Government examine avenues to reduce the financial burden on employers taking on apprentices, particularly SMEs.”

NATIONAL TRAINING FUND 2010 - 2019											
	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019 Prov.	2019 to June
National Training Fund Levy	309,000	316,000	299,000	317,000	338,000	364,000	390,000	431,000	565,500	684,824	684,824
Expenditure:	395,221	326,479	340,890	348,797	346,899	333,981	344,166	357,112	415,361	485,590	231,290
Programmes for those in Employment	91,188	75,261	72,313	59,423	61,274	64,986	77,485	96,015	150,075	199,860	96,015
% of Expenditure	23.10%	19.00%	18.30%	15.00%	15.50%	16.40%	19.60%	24.30%	38.00%	50.60%	24.30%
1. Training Programmes in Employment - SOLAS	69,617	54,236	52,467	39,600	39,600	42,600	54,665	65,599	86,650	105,273	54,197
- HEA							435	4,286	32,000	37,000	13,013
Total SOLAS & HEA (Apprenticeships)	69,617	54,236	52,467	39,600	39,600	42,600	55,100	69,885	118,650	142,273	67,210
% of National Training Fund Levy	22.53	17.16	17.55	12.49	11.72	11.70	14.13	16.21	20.98	20.78	9.81

NUMBER OF PARTICIPANTS WHO BENEFITED FROM NATIONAL TRAINING FUND 2010 – 2018									
	2010	2011	2012	2013	2014	2015	2016	2017	2018
NUMBER OF PARTICIPANTS									
Programmes for those in Employment	68,085	67,145	65,908	67,539	73,875	80,483	89,212	102,702	115,871
Apprenticeship Population (SOLAS and HEA)	10,172	8,328	6,223	5,711	6,913	8,317	10,445	12,849	12,464

The National Training Fund allocation to SOLAS and HEA for apprenticeships (as above) has increased by €87,173 from €55,100 in 2016 to €142,273 provisional for 2019, a 158% increase. In contrast apprenticeship numbers for 2016 were 10,445 and saw an increase in 2018 of just 2,109 apprentices at 12,464, just a 20% increase. There is more money being allocated but not in line with the number of apprentices. Perhaps questions should be asked regarding the distribution of these funds. Are monies being spent disproportionately on marketing rather than incentivising employers to engage?

ACTION

- A review of apprenticeships and steps taken to ensure culinary students receive the same benefits as apprentices from other sectors, be it bursaries, expenses, etc.

THE ASK

- To address the inequality between traditional (pre-2016) apprenticeships and new (post 2016) apprenticeships.
- Support for industry employers of new apprenticeships by ensuring they are not taking on all of the financial burden of an apprenticeship. Calculations for the cost incurred to a Commis Chef Apprenticeship employer show that it currently costs approx. €7,000 a year.

HOW:

1) Introducing a female bursary for new apprenticeships.
2) Setting a flat “in training” wage rate as a potential solution to enable all apprentices to be paid by SOLAS through educational providers.

ESTABLISHMENT OF A NATIONAL TOURISM AND HOSPITALITY TRAINING AUTHORITY

Since the publication of the EGFSN report, a National Oversight and Advisory Group ‘Hospitality Skills Oversight Group’ was developed. This forum met 6 times per year and consisted of the following members;

- SOLAS
- Industry Bodies (RAI, IHF, LVA, IHI, VFI)
- Fáilte Ireland
- Educational Bodies (IOT’s, QQI, HEA, ETBI)
- Dept. Social Protection
- Dept. Education
- Dept. Jobs, Enterprise & Innovation
- Regional Skills Dublin

The Hospitality Skills Oversight Group published their 2017 interim report (August 2017) and one of the findings of the report was that hospitality is a diverse industry that would benefit from further co-ordination. Subsequent to this the Tourism and Hospitality Skills Tourism and Hospitality Careers Oversight Group was formed involving the stakeholders above.

What is it? The Tourism and Hospitality Careers Oversight Group was established to coordinate the relevant bodies to agree and implement a work programme to address current and future labour supply and skills requirements in the tourism and hospitality sector.

Why? It is recognised that the best approach to support sustainable employment in the Tourism and Hospitality sector requires a coordinated and collaborative approach by industry, education, training providers, and other relevant stakeholders.

How? Members of the Tourism and Hospitality Careers Oversight Group have developed a two-year work plan for 2019/20 that focuses on delivery of five targeted objectives. Initially chaired by Fáilte Ireland, the group will oversee the implementation of key activities to deliver on agreed KPIs.

Key Objectives: Career Promotion, Employment Connections, Recruitment and Retention, Curriculum Alignment and Mapping Existing Provisions.

CERT

The Council for Education, Recruitment and Training (CERT) was held in very high regard during its operational years. It was funded by Bord Fáilte, the Department of Labour and the industry and run by a board including hoteliers and restaurant owners. The board undertook to promote a career in tourism to young people and provided direct skills training at its network of training centres and in developing tourism and culinary orientated education in VECs and other colleges.

The RAI would like to see a National Tourism and Hospitality Training Authority established based upon the format of the Credit Review Office, to do the following:

- Oversee policy development in hospitality training needs and the development of national training structures and programmes.
- Be a one stop shop for information regarding all training locations and programmes related to the tourism and hospitality industry.
- Deliver a National Hospitality Careers Roadshow.
- Develop a training charter and an official National code of practice.
- Engage with secondary schools for the recruitment, training and formal education of young school-leavers, preparing and incentivising them for careers in the Industry.

ACTION

- Establish a National Tourism and Hospitality Training Authority

WORK PERMITS

The Restaurants Association of Ireland welcomed Minister Humphreys' announcement in March 2018 regarding the inclusion of four chef grades for consideration on work permits, as below. The Association has long made applications to the Department of Business, Enterprise and Innovation for the removal of chefs from the Ineligible Categories of Employment List and welcomes this change as previously the only chefs applicable for work permits within the chef category were specialist cuisine chefs.

The Minister approved an exemption from the ICEL list for the following chef grades in response to evidence that the Irish labour market is experiencing a shortage:

- Executive Chef with minimum of 5 years' experience at that level
- Head Chef with minimum of 5 years' experience at that level
- Sous Chef with minimum of 5 years' experience at that level
- Chef de Partie with minimum of 2 years' experience at that level

A quota of 610 General Employment Permits is available for these chef roles, with a maximum number of two such employment permits to be granted per establishment.

This much welcomed and long lobbied for change however simultaneously saw the removal of the specialist cuisine chef work permit which had been in place for many years. Such skills are not native or readily available within Ireland or the European market for Asian cuisine specialists, in particular. As such, the exemption existed and enabled specialist cuisine restaurants to operate, whilst maintaining the 50% work permit staff cap. The new quota for the four chef grades does not provide any exemption on the two-permit cap for these restaurants and specially skilled chefs.

A cap on work permits per establishment is welcomed in maintaining a fair opportunity for all restaurants, both big and small (of which the majority of RAI members are) to avail of work permits. However there needs to be consideration for a section of the restaurant industry who had long operated and relied upon the work permit scheme to run their businesses.

In its "Report on the Cost of Doing Business" published in July 2018, The Joint Committee on Business, Enterprise and Innovation recommended that "the work permit applications for particular sectors continue to be considered on a regular basis by the Department of Business, Enterprise and Innovation." This is a welcomed suggestion by the committee, however in light of the abolishment of the much-needed specialist cuisine chef work permits, it is necessary for such a review to take place immediately.

Similarly, The Joint Committee on Business, Enterprise and Innovation Report on: "The Role of Apprenticeships and Work Permits in Addressing Ireland's Skills Needs" published in May 2019 observed and recommended the following regarding work permits: "The Committee welcomes the reduction in waiting periods for trusted partners but is concerned that the standard time remains high. The Committee Recommends that additional resources be made available to process work permit applications and that processes are in place to meet unexpected spikes in demand in the future".

CULINARY WORK PERMITS STATS TO DATE:

1 in 4 work permit applications in 2019 for our sector (Catering) have been refused in 2019

Year	Month	Sector	New	Renewal	Total	Refused	Withdrawn
2019	January	Catering	37	10	47	12	0
	February	Catering	33	3	36	19	1
	March	Catering	43	8	51	18	3
	April	Catering	25	12	37	12	6
	May	Catering	33	13	46	15	2
	June	Catering	9	8	17	4	4
	July	Catering	31	19	50	8	1
			211	73	284	88	17
Total Permit Applications (Total + Refused)					**372**		

Source: https://dbei.gov.ie/en/Publications/Employment-Permit-Statistics-2019.html

In **2018 35% of Catering Sector work permit applications were refused** (196 of 555 applications received).

Year	Month	Sector	New	Renewal	Total	Refused
2018	Jan	Catering	17	4	21	21
	Feb	Catering	20	4	24	10
	March	Catering	41	11	52	42
	April	Catering	17	4	21	9
	May	Catering	13	3	16	1
	June	Catering	12	6	18	21
	July	Catering	47	3	50	37
	August	Catering	40	14	54	12
	Sept	Catering	9	8	17	6
	Oct	Catering	15	10	25	3
	Nov	Catering	29	15	44	20
	Dec	Catering	12	5	17	14
			272	87	359	196
Total Permit Applications (Total + Refused)					555*	

Source: https://dbei.gov.ie/en/Publications/Employment-Permit-Statistics-2018.html

Processing time was 13 weeks in 2018 – reduced to 11 weeks in the first quarter of 2019 and peaked at 14 weeks in July 2019

ACTION

- Greater communication between Dept of Tourism and Work Permits division of the Dept of Business, Enterprise and Innovation regarding work permit requirements for Tourism and Hospitality Sector, alongside continued industry consultation.
- Draft proposals for the review of existing work permits legislation – Department of Business, Enterprise and Innovation has indicated that current work permit legislation is in need of review and update – we would like to see progress in this area, even if it was just an amendment to the labour market needs test – to allow work permit processing to be more reactive to labour market needs and to bring it in line with modern methods utilised by job seekers.
- Reinstate the specialist cuisine chef work permit to operate alongside the 610 general chef work permit allocation announced in March 2018.

OR

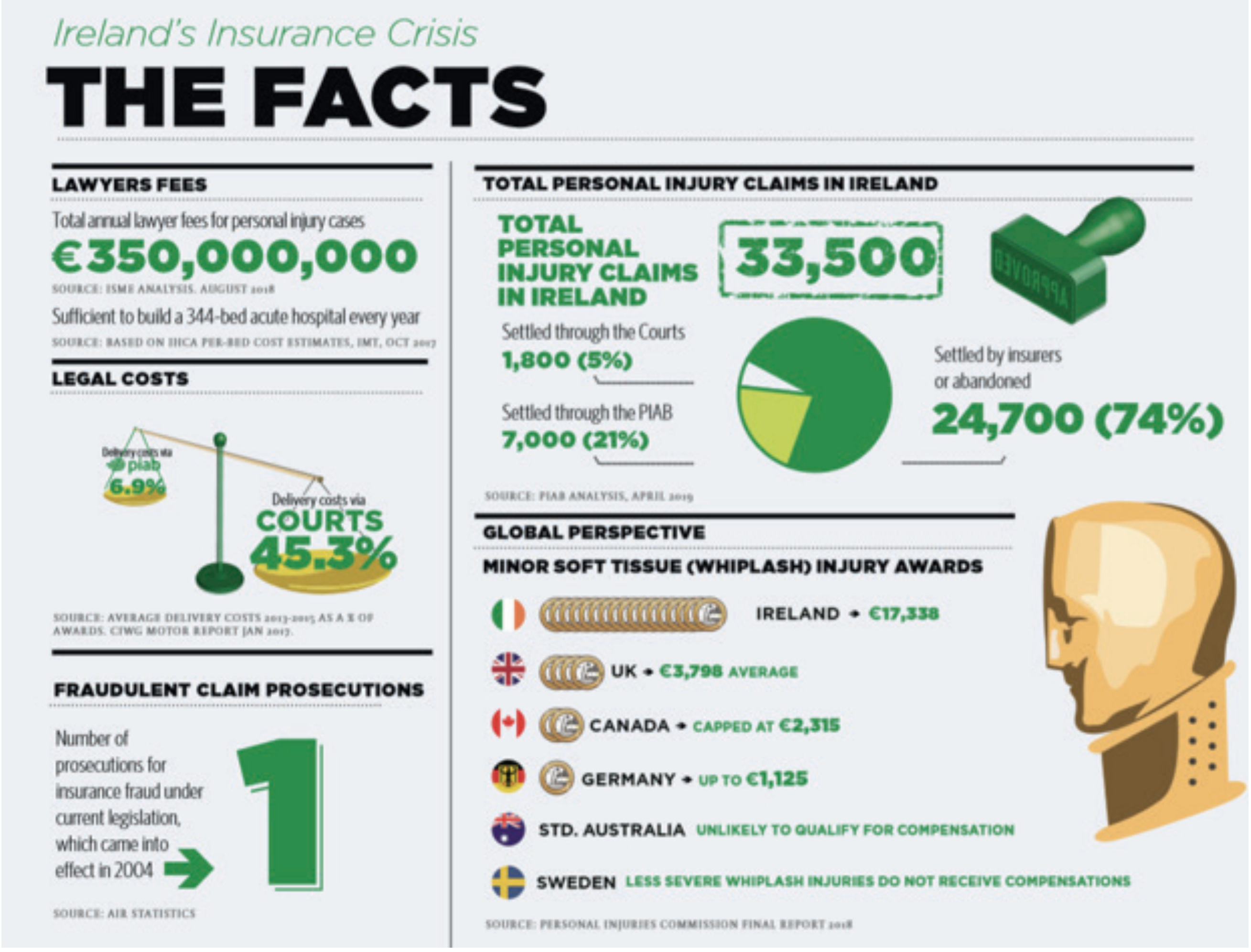
- Create an exemption for specialist cuisine chefs from the current 2-person cap on work permits, with the 50/50 rule still being adhered to.

3) THE COST OF DOING BUSINESS

INSURANCE

The Restaurants Association of Ireland is a member of The Alliance for Insurance Reform which brings together 28 civic and business organisations from across Ireland, representing 36,000 members with 640,000 employees to demand action to end crippling insurance premiums.

It is a response to countless stories from small organisations where services and jobs are being damaged by excessive insurance costs.



The Alliance's general objectives and specific real reforms are:

PREVENTION of exaggerated and misleading claims being pursued and settled

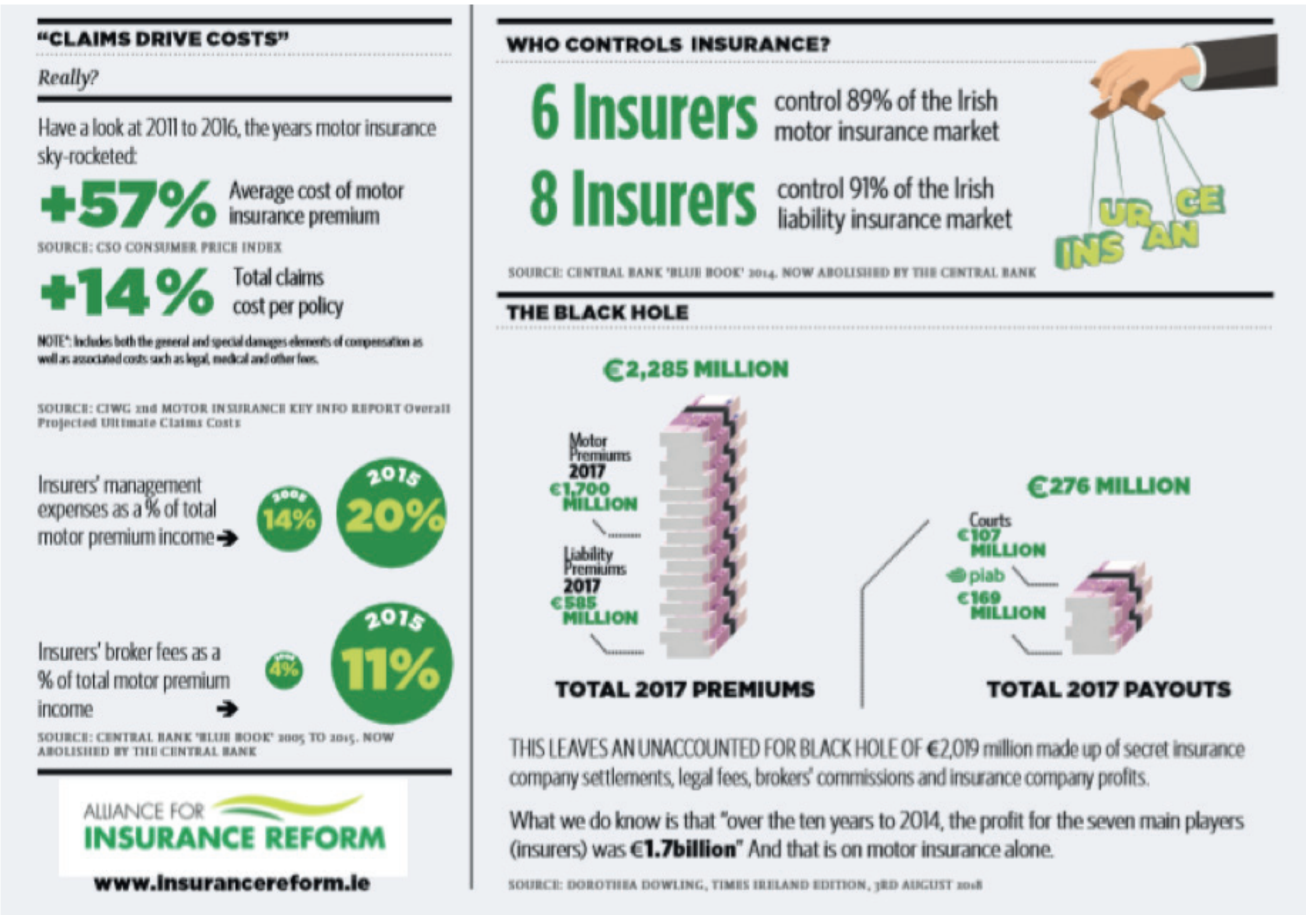
1. Set up the Garda Insurance Fraud Unit
2. Link Sections 26 and 25 of the Civil Liability Act 2004 so that exaggerated and misleading claims are automatically forwarded to the Gardai for potential prosecution
3. Oblige lawyers to comply with the duties of candour and inquiry now being applied to Asylum cases

CONSISTENCY in the calculation of awards at realistic and affordable levels

4. Recalibrate the Book of Quantum to reflect international norms and norms already established by the Court of Appeal
5. Redefine and re-balance the “common duty of care” to require the occupier to take a duty of care that is reasonable, practical and proportionate.

TRANSPARENCY on how premiums are calculated, and claims are settled

6. Produce a schedule of forecast reductions for reforms
7. Reinstate the 2003 IIF/IBEC protocol on dealing with claims
8. Publish an up to date Key Information Report on Employer and Public Liability insurance claims
9. Make a Claim-by-Claim Register available.



In its July 2018 “Report on the Cost of Doing Business” the Joint Committee on Business, Enterprise and Innovation made the following recommendations on the current issues with Insurance experienced by all sectors:

- Earlier notification time of claims to the defendant
- The establishment of the Garda Fraud Unit
- That where an award exceeds the Book of Quantum, that the judge gives a written explanation as to why

We welcomed these recommendations by the committee, made over a year ago and would encourage that action be taken based upon them.

ACTION

- Funding for the Garda response to insurance fraud. We have repeatedly proposed that this come from the PIAB’s reserves.
- Funding to ensure the urgent and effective establishment of the Judicial Council as necessary

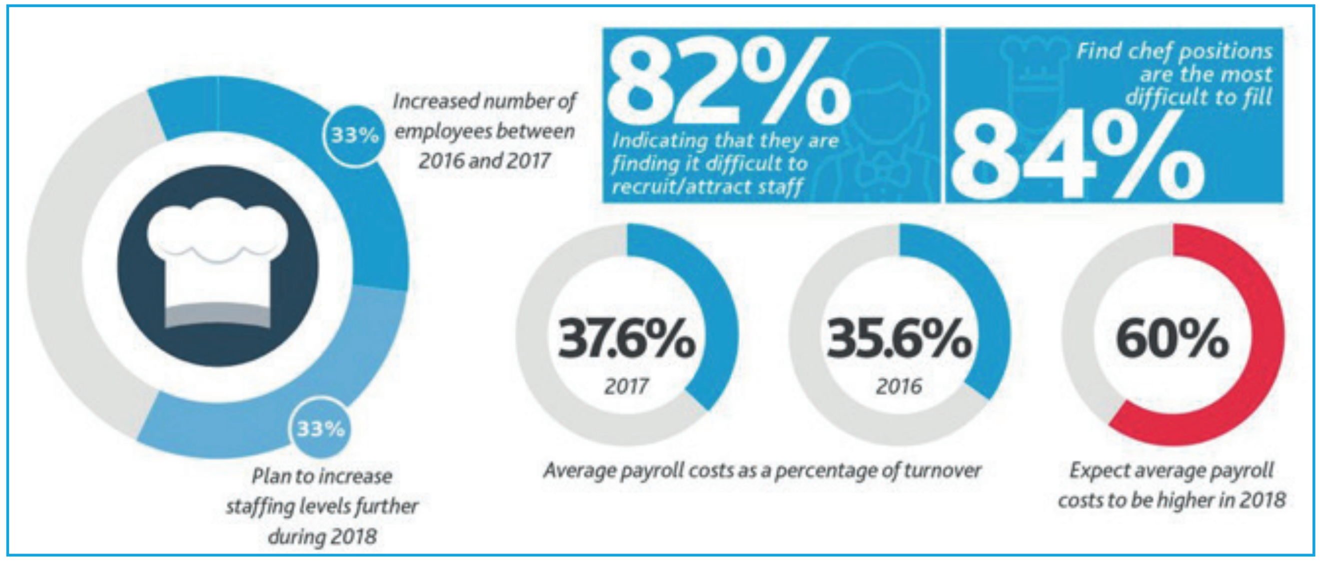
LABOUR COSTS

The Minimum Wage

The Restaurants Association of Ireland commissioned BDO to conduct an independent survey of members in quarter one of 2018 to gather both operational and financial data on the performance of the restaurant sector in Ireland.

The respondents comprised of:

- 48% City/ Town Centre
- 18% Suburban
- 34% Rural



- Respondents reported a 2% increase in payroll costs as a percentage of turnover
- Despite seeing an average increase in food margin percentage of only .2%

The Restaurant sector is very sensitive to wage costs and it is essential that increases in the minimum wage do not impact negatively on employment, hours worked, the price of the product and general wage levels in the sector. Consequently, further increases in the minimum wage would need to be considered very carefully, particularly given the competitiveness challenges now facing the Irish economy in general and the tourism sector in particular from Brexit, the increase in the VAT rate in Budget 2019, and intense pressure on a range of input costs, particularly insurance and commercial rates. The closer businesses are to the border, the worse the impact of an increase in the minimum wage due to sterling weakness. The Restaurant sector in Dublin should not be taken as a barometer of the sector countrywide. Trading conditions are very different around the country.

It is important that the minimum wage is not used as the main element of reducing inequality. Getting housing costs down, reducing the personal tax burden, and targeted social welfare would be more prudent from a policy perspective.

Foreign Direct Investment is very important to the Irish economy, but there is a significant concentration risk for Ireland. Multi-national companies account for one third of total income tax, Universal Social Charge (USC) and Employers PRSI paid in the State. In 2018, 10 firms accounted for almost 40% of Corporation Tax receipts, which equates to around €4.1 billion. The identities of the 10 companies are not known, but the strong likelihood is that they are all foreign-owned. This highlights just how vulnerable Ireland would be to an FDI shock. Consequently, it is imperative that policy towards indigenous business activities is as supportive as possible. Setting the appropriate level for the minimum wage is an important component of this agenda.

As a principle, the National Minimum wage is socially and economically positive and it should increase as economic circumstances improve. However, it is vital that the minimum wage is set at an appropriate level and that it does not undermine employment or damage the competitiveness of the Restaurant sector and the general tourism proposition.

Source: A Report on The National Minimum Wage by Economist Jim Power, February 2019

THE LIVING WAGE

In July 2019 the Living Wage Technical Group announced the new living wage as €12.30, a 40c or 3.4% increase.

Two concerns have been highlighted by the Restaurants Association of Ireland membership regarding this determination by the Living Wage Technical Group.

THE MAKEUP AND OVERSIGHT OF THE LIVING WAGE TECHNICAL GROUP

1. The Living Wage Technical Group appears to consist of; Vincentian Partnership, Nevin Economic Research Institute, TASC, Social Justice Ireland, UCD, Unite Trade Union, SIPTU, whilst employee bodies are well represented there is a distinct lack of input from employer representatives. This is in comparison to the Living Wage Foundation in the UK, that is a registered charity and rates are calculated annually by the Resolution Foundation. The Foundation is overseen by the Living Wage Commission which consists of both Trade Unions, University research centres and employers.

Source: https://www.livingwage.org.uk/living-wage-commission

DATA

2. The annual inflation rate in Ireland fell to 1.0 percent in May of 2019 from 1.7 percent in the previous month. It was the lowest inflation rate since February, as prices slowed mostly for housing & utilities, transport and restaurants & hotels. Inflation Rate in Ireland averaged 4.49 percent from 1976 until 2019, reaching an all-time high of 23.15 percent in October of 1981 and a record low of -6.56 percent in October of 2009.
   According to research conducted by the Economic and Social Research Institute (ESRI): “A minimum wage policy may not be an effective tool in reducing the level of household poverty, the report stated (in reference to the 2018 increase in minimum wage) “while the change had no measurable impact on household incomes, workers directly affected earned an additional €30 a week. Usually, these were casual employees and young people who were not primary family earners and their contributions to household incomes were found to be insignificant. Because of that finding, the use of a minimum wage policy was challenged as being an efficient way to tackle poverty.”

ACTION

- No further increase in minimum wage in the short term

COMMERCIAL RATES

We recognise that local authorities are striving to maintain the delivery of high-quality local services in the face of increasing strained financial resources. However, as a business representative body we cannot dismiss the fact that businesses are now paying more rates for less services. In recent years costs have increased with the transfer of water and waste services to Irish Water and private commercial waste services.

How are commercial rates calculated?

Local authorities charge commercial rates on the basis of valuations provided to them by the valuations office.

The valuations office visits a premise to establish the net value of the property, which in a restaurants case would usually be the rent for the year. The valuations office will compare the annual rental value with other similar properties in the area. Each local authority sets an annual rate of valuation (ARV) common to all commercial, industrial and non-domestic properties.

The valuation of a property is multiplied by ARV to calculate the number of commercial rates payable per annum.

For a restaurant the calculation of rates does not take in to account;

- the ability to pay
- the size of the premises
- Profitability
- Numbers employed
- Location

However, other licensed premises such as hotels and public houses are valued by reference to the trading data of their property.

By using the valuation system of rents, it does not take in to account where a neighbouring property has benefitted from the ban on upward only rent reviews. This is clearly unfair to those restaurateurs whose lease still include an upward only rent review provision and does not reflect the market rent thus ultimately leading to the higher the rent, the higher the commercial rates that are paid.

ACTION

- A review of the commercial rates system to reflect a more fair and propositional valuation for all business types

OTHER BUSINESS COSTS

BUSINESS IMPROVEMENT DISTRICTS LEVY (BIDS)

In some local authority (Urban areas) an additional rates charge has been charged to businesses, known as a Business Improvement District Levy. This BID's scheme is currently operating in;

- Dublin
- Dun Laoghaire
- Ennis
- Sligo
- Dundalk

A percentage is added to the commercial rates bill of the property that goes directly in to the BID fund. To establish a BID, business owners must vote for it to be established.

For example, in Sligo ratepayers contribute a levy calculated at 3.09% of their respective rateable value giving the BID an annual budget of approximately €375,000 per annum.

In Dublin city centre, the BID was established in January 2008 and the levy was calculated at 3.8% and in 2017 it was 5.9% with the potential for further increases of 1%-2% in 2018/2019 as they now link it to inflation. Dublin Town is the organisation tasked with running the BID and a vote takes place every 5 years. It is mandatory for businesses to pay the levy. In some areas of the centre members benefit and in other areas they do not.

The BID levy is seen by many as a double taxation. The policy document, "A Framework for Town Centre Renewal", recommends the establishment of BIDS areas throughout many towns in Ireland or else the Town Team Model. This document also illustrated the example of the Town Team Model, where Roscommon county council agreed to forego 1% of the rates to establish Town Team's in 6 major towns in Roscommon.

Members of the Restaurants Association, would prefer to see that the current rates they pay go towards the Town Team initiative rather than be levied with additional rates charges.

OUTDOOR SEATING CHARGES

In some local authority areas, restaurants must pay for outdoor seating and tables. The following local authority areas would on average charge €125 per table and two or four chairs;

- Dun-Laoghaire Rathdown County Council
- Dublin City Council
- Fingal County Council
- Wexford County Council
- Tipperary County Council
- Louth County Council
- Kerry County Council
- Kilkenny County Council
- Cork City Council
- Cavan County Council
- Waterford County Council
- Offaly County Council
- Sligo County Council
- Mayo County Council
- Limerick City and County Council

In some areas, restaurants/cafes are also charged for Sandwich Boards outside their premises. This could be a one-off yearly fee that previously cost in the region of €75-€125, it has been announced by Dublin City Council that this charge will now increase to €630 from 1st September 2019. This decision was taken without consultation with relevant stakeholder groups, including business representative organisations such as ourselves. It is prohibitive for small independent businesses who wish to promote their establishments within their local communities.

ACTION

- A review of local authority charges to provide greater consistency and accountability for rate payers

UTILITY COSTS

In our submission and subsequent statements to the Joint Committee on Business, Enterprise and Innovation, prior to the publishing of their "Report on the Cost of Doing Business" the RAI indicated that members are subject to almost 28 different licences, regulations and regulatory regimes. The fats, oils and grease charge costs restaurants on average €1000 alone. Also, multiple inspections could be conducted by a single entity such as the Environmental Health Officer to save time and resources for all parties involved.

In the publication of its final report the Joint Committee made the following recommendation: "A review of all regulatory systems that affect businesses be undertaken, with a view to streamlining and combining the inspection and enforcement of the rules to reduce the cost of compliance for business". The RAI welcomes such a recommendation.

4) EXCISE DUTY

The Drinks Industry Group of Ireland (DIGI) is the umbrella organisation for the drinks industry. It is composed of manufacturers, distributors and both on-trade retailers (pubs, hotels and restaurants) and off-trade retailers (independent off-licences).

Its members include:

- Alcohol Beverage Federation of Ireland
- Irish Hotels Federation
- Licensed Vintners Association
- National Off-Licence Association
- Restaurants Association of Ireland
- Vintners Federation of Ireland

Together, these and other drinks employer groups sustain directly and indirectly an estimated 90,000 people working directly and indirectly in drinks manufacturing, drinks distribution and visitor centres throughout the country and contribute to the much larger number of jobs in the hospitality sector.

Ireland's alcohol excise tax is the second highest in the European Union. We have the highest tax on wine, the second highest on beer, and the third highest on spirits.

The drinks industry experience of the recession is notable in that it received a significant excise (tax) reduction in 2009, but this was almost fully reversed for beer, cider and spirits by the increase in excise in December 2012 and was more than fully reversed for wine. The increases in Budget 2014 left all four beverages groups with higher excise rates than in 2007. The industry continues to suffer from the austerity-related excise tax levels.

Table 5.2 Excise rates 2007 to date

	2007	October 2008	December 2009	December 2012	October 2013	Current	% change 2007 to date
Beer, per hectolitre percent of alcohol	19.87	No change (nc)	15.71	19.13	22.55	22.55	13.5
Cider	83.25	nc	65.86	80.16	94.46	94.46	13.5
Spirits, per litre of alcohol in the spirits	39.25	nc	31.13	36.85	42.57	42.57	8.5
Wine, per hectolitre up to 15% abv	273.00	328.09	262.24	370.64	424.84	424.84	55.6

Source: Revenue Commissioners.

OUR HIGH EXCISE TAX:

- unfairly penalises over 13,500 Irish businesses (7,000+ pubs, 3,000+ off-licences, 950+ hotels, 2,400 + restaurants, 450+ wholesalers, 100+ producers) and Irish consumers
- puts jobs in rural Ireland at risk - over 200,000 people are employed in this industry
- negatively impacts Ireland's attractiveness as a tourist destination, at a time when tourism revenue is declining
- limits the potential of a fast-growing and internationally scaling drinks industry
- exposes Ireland to more Brexit risk.

A reduction would reverse austerity measures - as a consequence of Budget 2013 and Budget 2014, and in less than twelve months between December 2012 and October 2013, excise tax on beer increased by 44%, on spirits by 37%, and on wine by 62%.

ACTION

- The Restaurants Association of Ireland as a member of The Drinks Industry Group of Ireland (DIGI) is calling on the Irish Government to reduce alcohol excise tax by 7.5%.

5) NATIONAL TOURISM POLICY

Irish Tourism needs organisation and leadership – a single voice is needed for the organisation of tourism in Ireland, particularly training and skills. The national marketing and development functions are divided between two organisations and regionally between multiple bodies causing confusion and lack of direction and leadership. There are a number of groups established, including the aforementioned Tourism and Hospitality Careers Oversight Group which serve important functions in their own right, however a single voice is needed to steer all stakeholders in a common goal.

What would contribute greatly to this would be better communication between leading Government Departments, such as the Department of Transport, Tourism and Sport, the Department of Finance Public Expenditure and Reform and the Department of Business, Enterprise and Innovation.

To date there have been a number of inter departmental working groups established that cover specific areas, including work permits. Our recommendation is the establishment of an interdepartmental working group on Tourism, chaired by the Department of Transport, Tourism and Sport, informed by research, observations and recommendations by a tourism stakeholder group.

Recent announcements within the UK for example highlight what can be done to safeguard and grow the tourism industry. In an announcement of the UK Tourism Sector Deal in June 2019, (which will include a Hospitality and Tourism Skills Board) the forward included the following regarding UK Tourism: "Tourism is our calling card to the world, and it has never been more important to ensure that Britain continues to be a world-class destination competing for global business. This Sector Deal backs our small businesses, our entrepreneurs and our innovators. It sets out an ambitious agenda that will deliver the increases in productivity and investment that will benefit local economies right across the country". This comes from a nation that historically has been the main source of Irish Tourists, such steps should be considered in the efforts to equally safeguard and grow the Irish Tourism offering.

TOURISM LEADERSHIP GROUP

Whilst the Restaurants Association of Ireland welcomes the newly reconstituted Tourism Leadership Group which was originally established to draw from a cross-section of representative bodies in the tourism sector, including the tourism agencies, the Local Authority sector, retail, and tourism technology. The makeup of the group may not be as broad as it could be, to best achieve the targets it has set, including:

- Revenue from overseas tourists, excluding carrier receipts, will increase to €6.5 billion in real terms (i.e. excluding the effects of inflation) by 2025, up from €5.2 billion in 2018.
- Employment in the tourism sector will be 310,000 by 2025, compared to around 260,000 in 2018.
- There will be 11.6 million tourists visiting Ireland annually by 2025 (tourists are defined as overseas visitors staying at least one night – the figure in 2018 was 9.5 million).

TOURISM LEADERSHIP GROUP MEMBERS

Paul Kelly	Fáilte Ireland
Paul Kelly	Fáilte Ireland
Niall Gibbons	Tourism Ireland
Ann Doherty	CCMA
Stephen McNally	Dalata Hotel Group
Tom Randles	Randles Hotels
Paudie Healy	Universal Access
Helena Healy	B&B Ireland
Olivia Duff	Headfort Arms Hotel
Stephen Cotter	CIE Tours
Niall O'Callaghan	Heritage Ltd
Michelle Maguire	Blue Book
Michael McDonnell	Viking Tours
Jean Hoey	AirBnB Ireland
Gráinne Kelliher	Airfield Estate

The Restaurants Association of Ireland would have welcomed inclusion of Irish Tourism Industry Confederation (ITIC) in this leadership group and / or broader representation of transportation including air and rail. It is concerning that there is no specific representation of food and drink in the group. Every visitor to Ireland, regardless of the purpose of their trip will visit at least one; restaurant, gastro pub, café or drinking establishment. As such it seems only logical that this sector of tourism is represented.

TOURISM SATELLITE ACCOUNT (TSA)

Tourism Satellite Accounts are the international standard statistical framework used to compute the economic value of tourism by merging data coming from National Accounts with tourism expenditure data coming from tourism surveys.

According to a recent report by CAST – Centre for Advanced Studies in Tourism for the European Union: The economic impact of tourism in the European Union - Final report, February 2019: "There is a real data shortage for tourism in Europe that is not in national accounting but instead in the field of tourism accounting. One of the main problems identified is listed as follows:

Some countries are not working on building their own national TSA. This is mainly the result of TSA not being included in the legal framework of Eurostat, hence National State Organisations (NSOs) are investing only marginal and residual time and human resources in their development. The improvement in IT and in statistical tools certainly will be making the collection and organization of information more efficient in many other sectors of the economic system. Hence, NSOs might soon release human and financial resources to dedicate to TSA Development.

There are 9 such countries (Croatia, Cyprus, Greece, Hungary, Ireland, Latvia, Luxembourg, Netherlands, Slovakia) with Ireland included on the list." Ireland needs a Tourism Satellite Account. To enable access to real time data and also to enable more accurate bench marking against other EU member states.

ACTION

- Review Restaurant VAT rate in light of a "disorderly" Brexit - to ensure Ireland is competitively in line with its European counterparts
- Organisation and Leadership – a single voice is needed for the organisation of tourism in Ireland, particularly training and skills. The national marketing and development functions are divided between two organisations and regionally between multiple bodies causing confusion and lack of direction and leadership.
- Establish an Inter-Departmental Tourism Committee to ensure coordinated and joined-up decision making in all areas that impact upon tourism.
- Establish a Tourism Satellite Account to enable transparent and accurate recording of tourism data

6) NATIONAL FOOD EDUCATION POLICY

There is a lack of nutrition, culinary and general food education in our Primary Schools. Currently, Social, Personal and Health Education (SPHE) and Physical Education are the only areas in the Curriculum and Syllabus for Primary Schools that cover diet and physical well-being. The topics covered under these classes include:

- Healthy eating and the food pyramid
- Healthy lifestyle
- Body care
- Exercise
- Exercise
- Relaxation
- Diet

The Restaurants Association of Ireland (RAI) believe that is inadequate, and that the onus is currently on individual schools, Education and Training Boards and, in some cases, individual teachers to find the resources to teach about culinary education and nutrition or outsource to local chefs and food ambassadors or programmes like Food Dudes or Agri Adware's Incredible Edibles initiative.

Food education cannot be solely teacher and industry led. It is crucial that there is comprehensive and cohesive guidance from the Department of Education and Skills. The RAI would like to see the development and implementation of an extensive educational programme on nutrition and culinary skills, to be incorporated as a standalone section on the Curriculum and Syllabus for Primary Schools.

The RAI are disappointed to see that the report from the Joint Committee on Children and Youth Affair (JCCYA) on tackling childhood obesity failed to consider nutrition and culinary education in primary schools. There are valid concerns that beginning food education at second level is too late, and the RAI are keen to make nutrition and culinary education part of the curriculum at primary level.

The research in the JCCYA report states that home economics is the only subject where children are taught food nutrition and how to cook for themselves, and that this lessons dependence on processed and take-away foods. Despite stating this research, the JCCYA failed to recommend the expansion of home economics into primary schools and also failed to make any other recommendations on teaching children about nutrition.

The JCCYA also recommend that a “whole system” approach should be taken to the prevention of obesity in children. Given this, the RAI are at a loss to understand how teaching children about nutrition and culinary skills from a young age doesn’t fit in the “whole system” approach. Many of the recommendations in the JCCYA about school environment only make recommendations about school environment and contain nothing regarding teaching children about nutrition and food skills.

The RAI have long lobbied for better food education for children. We welcome the recommendation that Home Economics should be a compulsory subject for the Junior Cycle. However, we are concerned that this is not enough, and that nutrition and culinary education needs to be developed in primary schools.

ACTION

- Comprehensive Culinary and Nutritional Education to be a mandatory element of primary and secondary syllabus.

Restaurants Association of Ireland,
11 Bridge Court,
Citygate, St. Augustine Street,
Dublin 8, Ireland.
Registered in Ireland No: 56224IE, VAT No: IE4803163P

t: +353 1 6779901
f: +353 1 6718414
w: www.rai.ie
e: info@rai.ie

http://www.facebook.com/RestaurantAssociationofIreland
@RAI_ie