

RAI Pre-Budget Submission 2023

DRIVING SUSTAINABLE RECOVERY FOR THE
RESTAURANT & HOSPITALITY SECTOR



RESTAURANTS
ASSOCIATION

OF IRELAND



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INTRODUCTION

The Restaurants Association of Ireland is the representative body for restaurants, cafés and gastropubs in Ireland. With over 2,700 business owners nationwide, we represent fine dining, casual dining, ethnic, family, gastropubs, and hotel restaurants. Established by restaurateurs 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.

1) TOURISM & HOSPITALITY VAT RATE

The extension of the 9% Tourism and Hospitality VAT rate until the end of February 2023 is welcome but provides no certainty of recovery for a sector that requires supports to return to pre-pandemic levels and must compete with other tourism destinations with a lower VAT rate. The following is analysis from Economist Jim Power on the current economic outlook for the Tourism and Hospitality Sector and the importance of a reduced VAT rate.

“The restaurant sector has come through extremely challenging times during the Covid-19 pandemic and the associated restrictions, which had a significant imposition on the restaurant sector. While the restaurant sector is concerned about the cost challenges and labour issues that it faces, and the possibility that discretionary consumer spending could weaken over the coming year, its main ask in Budget 2023 is that the 9 per cent VAT rate for the sector be extended beyond the proposed end-date of 28th February 2023. It would like to see financial assistance given to those under most pressure from the cost-of-living increases, and efforts made to increase the supply of overseas labour for the restaurant sector, but the VAT rate is its key priority.

In Budget 2021, a reduced 9 per cent VAT rate was re-introduced for restaurant supplies, tourist accommodation, cinemas, theatres, museums, historic houses, open farms, amusement parks, and hairdressing, as well as certain printed matter such as brochures, leaflets, programmes and catalogues. This measure was intended to help sectors that had been very badly affected by the Pandemic get back to a normal trading environment.

The reduced VAT rate was applicable from 1st November 2020 to 31st December 2021 at an estimated cost of €401 million. In Budget 2022, the measure was extended to 31st August 2022 at a further estimated cost of €251 million. In May 2022, the measure was further extended to 28th February 2023, at an estimated further cost of €250 million. It is envisaged that the 13.5 per cent rate will apply to all affected sectors on 1st March 2023.

Given the challenges and pressures currently being experienced by the restaurant sector, the Restaurants Association of Ireland is looking for the 9 per cent VAT rate to be extended for at least a further 2 years for the restaurant sector.

While it is accepted that it may be politically difficult to maintain a reduced VAT rate for sectors where significant consumer price increases are being experienced, the restaurant sector is in a very different situation. It is facing severe business challenges on the cost and labour market front, and has limited consumer pricing power, given the very competitive nature of the sector.

A number of countries across the EU have split VAT rates for hotels and restaurants. These include Estonia, Finland, Latvia, Malta, Portugal, and Slovakia. Outside of the EU, Norway Switzerland and Serbia have split VAT rates.



In the context of rebuilding the Irish tourism industry, restaurants are an essential element of the offering. They also provide considerable employment all over the countryside and are a key element of the streetscape in villages, towns, and cities around the country. The sector is now under significant competitive pressure and in the economic conditions likely to prevail over the coming year at least, a reversion to the 13.5 per cent rate in March 2023 would pose a considerable challenge for the sector.

Operating Environment for the Restaurant Sector

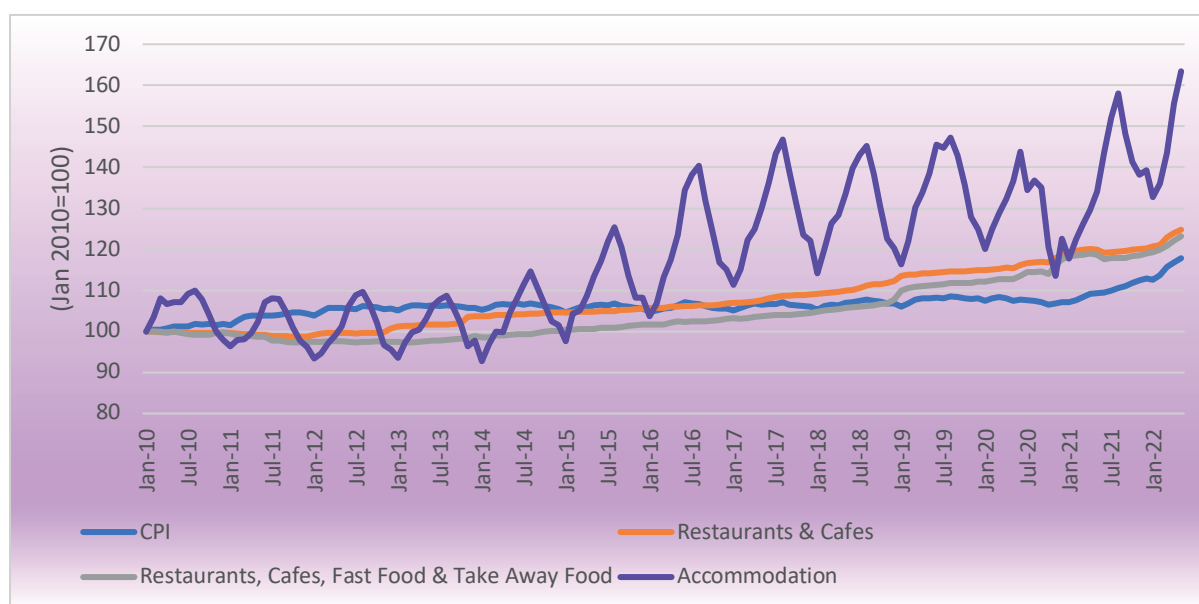
The restaurant sector experienced a strong rebound in activity as the Covid-19 restrictions were eased. However, the trading environment is now very challenging on a number of fronts. Staffing issues are very problematical and costs across the board are rising strongly. Unfortunately, it is difficult to see any of these business pressures abating any time soon. The sector is trading in a very challenging environment, and this looks set to continue.

In an economy approaching full-employment and in a sector that saw a significant exit of skilled personnel during the Covid-19 restrictions, the recruitment and retention of labour is proving a major challenge. Wage costs are rising strongly. However, of greater concern is the fact that many restaurants are under significant pressure to provide a full service due to staff shortages across all occupations within the sector. The capacity to deliver 'business as normal' is proving very challenging for many restaurant businesses.

In addition to the significant staffing issues, other costs such as energy and raw material prices such as food are rising strongly.

In the face of these price pressures, **there is pressure on restaurants to increase prices, but the rate of price increase in the restaurant sector is significantly behind the pace of price increases in the economy in general, and particularly in other areas of hospitality, such as accommodation.**

Figure: Consumer Price trends in Accommodation & Food Services Sector



Source: CSO PxStat

¹ HOTREC, VAT table – Rates as of 1st January 2022.

The latest inflation data from the CSO show that in the year to May 2022:

- Average consumer prices increased by 7.8 per cent.
- Consumer prices in 'Restaurants, Cafes and the like' increased by 4.1 per cent.
- Consumer prices in 'Restaurants, Cafes, Fast Food & Takeaway Food' increased by 3.7 per cent.
- The consumer price of 'Accommodation' increased by 21.9 per cent.

There is considerable comment and controversy about the escalation of prices in the Accommodation and Food Services sector, but **official CSO data show that the rate of price increase in the restaurant sector is well behind that in Accommodation and overall consumer prices.** In an environment of rapidly rising input costs, this poses a significant challenge for many restaurant businesses.” *Economist Jim Power.*

ACTION:

- Extend 9% VAT Rate for two further years to 2025

2) HOSPITALITY SKILLS AND RECRUITMENT

a) Tourism & Hospitality Skills Statistics:

National Data

ESRI - Quarterly Economic Commentary, Spring 2022: “With the lifting of public health measures and an end to pandemic related supports, we anticipate further improvements in the unemployment rate. Unemployment is set to average 6.3 per cent in 2022 and fall further throughout 2023. We expect unemployment to reach 4.5 per cent by Q4 2023 and average 4.8 per cent for the year”.²

Kroll Business Sentiment Survey conducted in February 2022 surveying members of Restaurants Association of Ireland and broader hospitality businesses found the following:

- 54% of member respondents identify as micro (less than 10 employees)
- 48% say trading performance will be below pre-pandemic levels for 2022
- Biggest issues for 2022: 54% said staff and 41% said rising costs
- 81% believe they will have to increase staff wages
- 72% said no or not sure to being adequately resourced from a working capital standpoint following withdrawal of Government supports
- 93% said it would be difficult to recruit / retain staff over next 12 months

Expert Group on Future Skills Needs (EGFSN): The 2015 Report by the Expert Group on Future Skills Needs (EGFSN): Assessment of Future Skills Requirements in the Hospitality Sector in Ireland ³ highlighted a skills shortage within the wider hospitality sector that had been in existence and persists now during the pandemic recovery.

Under “Findings and Conclusions” the EGFSN stated:

“There is a need for a more structured approach nationally of responsibility to drive the Hospitality sector to meet skills demand to 2020. There is presently an absence of an overall leadership and coordination function for the skills development of the sector.”

² <https://www.esri.ie/news/economic-consequences-of-invasion-of-ukraine-sees-consumer-prices-increase-continuing-supply>

³ <http://www.skillsireland.ie/all-publications/2015/Hospitality-Skills-Full-Report-for-Web.pdf>

The report noted the following in its “Overall Conclusion”:

“The Hospitality sector has significant potential for future growth. However, assuming a continued recovery in the economy, significant skills shortfalls are likely to emerge in key areas if actions are not taken in the short to medium term. The implementation of the recommendations set out in this report will facilitate the sector to make additional contributions to employment expansion in the Irish economy and to meet the targets set out in the Government’s Tourism Policy Review.”

Finally the EGFSN report gave two scenarios for projected skills demands 2015 – 2020, the first was “110,723 - *Adjusted to reflect estimated annual inflow of students in the Kitchen/Catering Assistants, Waiters/Waitresses and Bar Staff occupations.” The second scenario “96,006 - Adjusted to reflect estimated annual inflow of students in the Kitchen/Catering Assistants, Waiters/Waitresses and Bar Staff occupations.”

That 2015 report is now out of date and despite request from the Restaurants Association on three occasions between 2019 and 2022 there has been no review. Indeed two members of the EGFSN informed the Enterprise, Trade and Employment Committee in December 2021 that given the recommendation to setup a Tourism and Hospitality Careers Oversight Group (COG) following the 2015 Report, that group, chaired by Failte Ireland is responsible for such ongoing reports going forward.

Failte Ireland released the Hospitality & Tourism Survey - A short survey was executed in July 2021 with, 599 responses

- 88% of businesses trying to recruit new staff are experiencing difficulties in doing so
- 68% of businesses trying to rehire pre-existing staff are experiencing difficulties
- For those businesses experiencing difficulties, 57% describe the loss of international workers as significant.

RAI Member Survey:

Conducted in August and September 2021 – 154 participants

- 78% reduced the number of hours they trade per week compared to 2019
- 65% said this was due to the skills shortage
- 94% has issues recruiting staff
- 64% said the main reason they were experiencing recruitment issues was due to lack of applicants

b) Training & Retention

As an Association and a Sector we are involved with and have co-developed a number of initiatives for recruitment, retention, and education within the sector. As detailed below:

- **Apprenticeships:** We co-developed several chef apprenticeships; Commis Chef, Chef de Partie, Sous Chef and Head Chef, all of which offer degree qualifications as well as on the job training, through an earn and learn model. Our CEO Adrian Cummins has as of March 2022 been appointed by Minister for Further and Higher Education, Research, Innovation and Science Simon Harris TD, as one of two industry representatives to join the newly established National Apprenticeship Alliance.



- **Upskilling:** We operate the Restaurant & Hospitality Skillnet which aims to upskill existing employees and all staff, including hospitality business owners, managers and supervisors. Established in 2017 it has trained 1192 employees to date and is part funded and validated by the Department of Education through Skillnet Ireland. In 2021 YTD through the Restaurant & Hospitality Skillnet:
 - 420 Companies engaged with training of their employees
 - 2761 employees were trained
 - 90 unemployed people were trained
- **Oversight and Engagement:**
 - We are also part of the Tourism & Hospitality Careers Oversight Group, Chaired by Failte Ireland, the objective of which is to support sustainable employment in the tourism and hospitality sector.
 - 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.
 - We are members of the Tourism & Hospitality Forum
 - We have called for the establishment of a Recovery Oversight Group for Hospitality to focus on the hospitality sectors issues, including addressing the skills shortage that existed before COVID 19 and has seen in an increase following.

c) Recruitment

Members of the Restaurants Association of Ireland reported having positions on Jobs Ireland and paid recruitment websites for front of house and back of house hospitality roles listed for over 6 months with limited applications and applications received having no hospitality experience at all.

A Dublin based Recruitment Company with a specialist Hospitality Recruitment Division stated in August 2021: “75% of all vacancies are going unfilled due to the lack of applicants”

Failte Ireland are continuing in Summer 2022 with a research case regarding targeted European recruitment campaigns for hospitality staff. This work is due to be completed by mid / end of Q3 2022. What is needed is immediate action for an in-person recruitment mission to promote Irish tourism and hospitality careers in Ireland in other European Countries. Similar campaigns have happened in 2022 for other sectors of the economy experiencing a skills shortage and were led by applicable Departments, including Social Welfare through EURES. The ask is for Tourism and Hospitality be given the same commitment as soon as the appropriate target countries are identified. Q4 and the Christmas season are vital for hospitality with the majority of income made at this time of year so seasonal staffing by specialist European workers would save the season.

d) Work Permits

As an Association we acknowledge that the long-term solution to the current recruitment challenges and skills deficit in Hospitality can only be rectified by development of skills and promotion of the sector. The immediate skills shortage however does need to be addressed. There is a need for work permits to be processed in a timely manner (currently at 13 weeks as of July 2022 and hit a high of 21 weeks in March 2022) to reflect their intention of being an immediate and vital short time solution. We acknowledge both Ministers’ Varadkar and English commitment to staffing within the Work Permit section to alleviate the wait time but taking account the visa

processing times (applicable for applicants from certain countries) it was taking half a year to get a candidate into their role. Any efforts to further expedite staffing and processing are welcome.

Need for Critical Skills

Currently (as of 4th July) the processing time for General Work Permits, which the 4 applicable chef work permit occupations fall under is 13 weeks. As general work permits, they also require the mandatory 4 weeks of a labour market needs test, which due to the slow rate of updating primary legislation and the Departments' review of consolidating all work permits legislation, still includes a mandatory newspaper advertisement of the role.

The ask of the Restaurants Association of Ireland is that 4 of the more senior chef grades currently applicable for general work permits (Head Chef, Executive Chef, Sous Chef and Chef de Partie) be moved via statutory instrument by Minister English to Critical Skills Permits. The Minister just last month (June 2022) used his ability to move a number of other occupations from general work permits to critical skills, and we ask the same for these chef grades. Minister Varadkar whose Department of Enterprise, Trade and Employment processes work permits, has himself said in the last number of weeks that the country is at full employment. This acknowledgment of the current work force in Ireland, alongside the Failte Ireland evidence of the skills deficit of chefs in Ireland and Europe present the Department with a compelling reason to move these chef grade occupations to Critical skills.

It should be noted that a Critical Skills work permit requires a greater salary with a minimum €32,000. Critical Skills work permits also have a processing time of 6 weeks (currently July 2022) and no labour market needs test of 4 weeks prior required. Consideration of this ask should also view the craft and arts nature of the occupation and the check list for these occupations should take into consideration that a traditional education / qualification is not always available for chefs, indeed many Michelin starred chefs, including Irish ones, have no traditional academic qualification but rather a lifetime of on-the-job industry led inhouse apprenticeship style education.



e) EEA Workers

Whilst we appreciate that there was a backlog it was confirmed at the end of January 2022 that processing times in Cork and Dublin were then at 4 to 5 weeks, despite committing to processing the backlog of 5,000 application two months ago the processing times in Dublin and Cork at least, have gotten worse and now have applicants waiting 9+ weeks with no update. This has resulted in a number of employees from within the EEA choosing to leave Ireland in favour of another member state as processing times for PPS numbers and access to the work market is taking too long.

Resourcing of Government Departments

Since the reopening of the economy and the return to work it has been notable that there has been a backlog in processing various documentation issued by central Government, including but not limited to PPS numbers, Visas and Work Permits. An ask for Budget 2023 is consideration of the resources in each of the applicable Departments to ensure that individuals and businesses are not impacted.

The twice annual review of the Occupation Lists has been delayed in 2022 despite a commitment that it should take place twice yearly in response to the dynamic nature of the work force and skills requirements. In the absence of a review the Restaurants Association has outlined already above the 4 chef categories it is requesting to be moved to Critical Skills urgently by Statutory Instrument (outside of the review process). As part of the review there are a number of occupations aside from chefs which must be moved from ineligible occupations to applicable for general work permits, which are detailed below.

ACTION:

- Statutory Instrument by Minister for Enterprise, Trade & Employment to move occupations of Executive Chef, Head Chef, Sous Chef, and Chef de Partie to Critical Skills Work Permits
- Removal of the following occupations from the Ineligible Occupations List making them applicable for general work permits:
 - 1221 Hotel and accommodation managers
 - 1223 Restaurant and catering establishment managers (Food & Beverage Manager & Restaurant Supervisor Applicable)
 - 1224 Publicans and managers of licensed premises
 - 5436 Catering and Bar Managers (Food & Beverage Manager & Restaurant Supervisor Applicable)
- Resourcing of Government Departments and Sections to ensure timely processing of applications critical for workers and businesses; visas, work permits and PPS numbers. Adequate resourcing of the Workplace Relations Commission to ensure continued inspections and relevant investigations and oversight of employment law.

f) 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



3) THE COST OF DOING BUSINESS

a) 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.

Insurance Reform

The cost of insurance continues to have a negative impact on many sectors including our own of Hospitality and Tourism. It continues to act as a significant barrier to recovery post-Covid and will continue to hamper our sector unless it is materially resolved as a matter of urgency. We need insurance reforms that will quickly reduce liability premiums to affordable levels and keep them that way. These reforms have been identified but they are not happening fast enough. We urge the Department/Minister to ensure that sufficient funding is in place to allow for the following to happen:

ACTION:

- Enactment and commencement this year of duty of care amendments to the Occupiers Liability Act 1995
- Enactment and commencement this year of the Personal Injuries Resolution Board Bill 2022
- Rapid consolidation of the Judicial Guidelines in the courts and transparency as to awards in cases where the Guidelines apply
- An acceleration of the work of the Insurance Competition Office at the Department of Finance to ensure the urgent entry of more underwriters into the Irish liability insurance market

b) Labour Costs

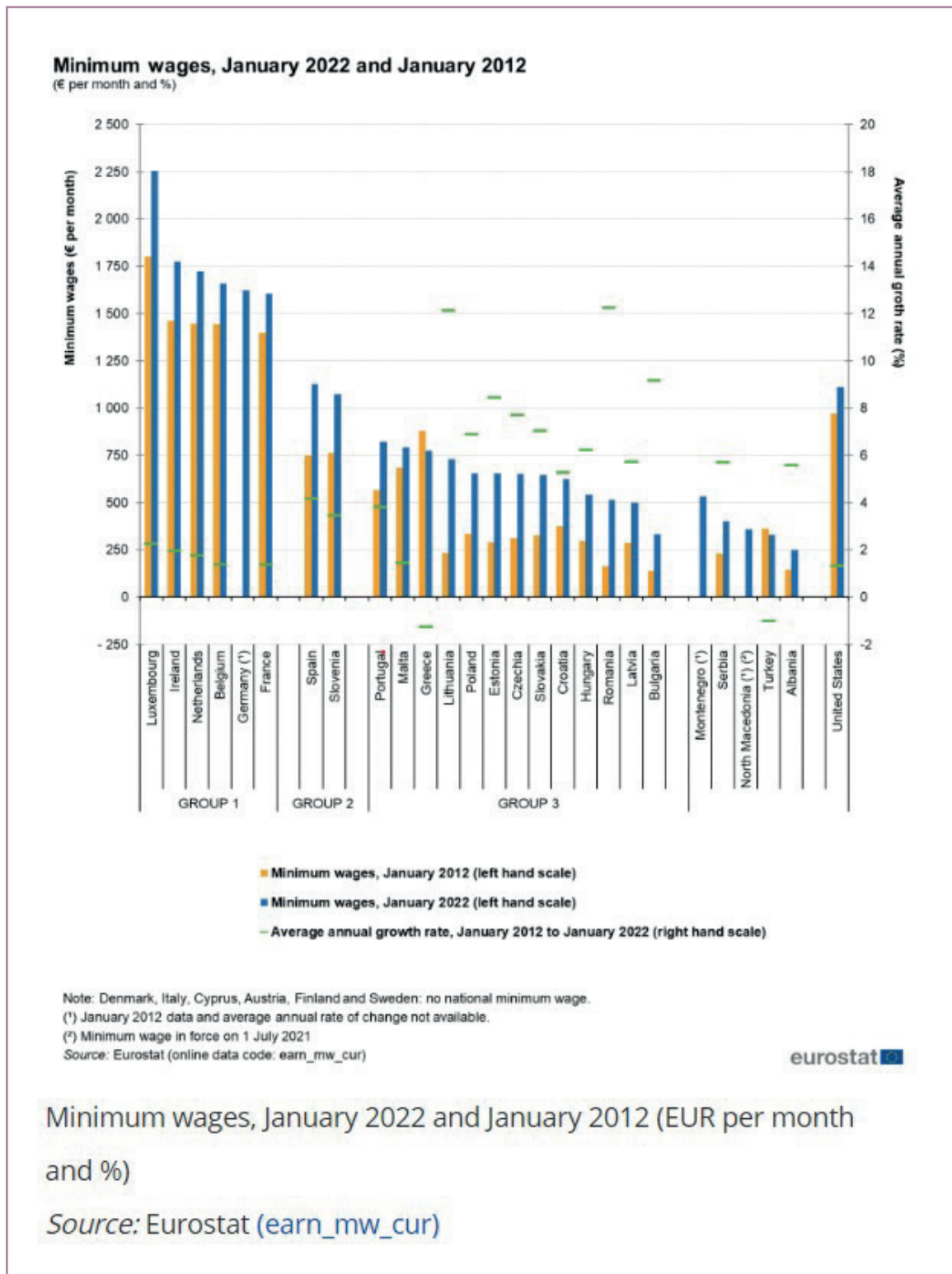
Ireland remains one of the highest minimum wage rate states in the European Union. The COVID pandemic which has resulted in some industries and sectors experiencing a long-term period of recovery, namely Tourism and Hospitality, the current level of inflation and the ongoing conflict in Ukraine have put extensive operational cost pressures on businesses in the last two years and will continue to do so.

Many businesses within Tourism & Hospitality face an upcoming Revenue Bill from warehoused debt, an increased VAT rate, rising costs of utilities and produce and the uncertainty of the recovery of pre-COVID trading levels due to reluctance of many international tourists to travel due to conflict in Europe. For the many reasons listed above which are ongoing and in flux it is recommended by the Restaurants Association of Ireland to retain the current national minimum wage at its current rate.



Upcoming Legislation / Schemes – Greater Social Security Contributions by Employers

The National Minimum Wage of Ireland is the second highest of EU member states as of January 2022 (table below) with 6 member states having no national set minimum wage. This position has been acknowledged by many Government Departments but has been accepted due to Ireland's current lack of employer social security contributions. As will be outlined in detail below, several imminent pieces of legislation will shortly rectify this and will see Ireland come in line with other member states regarding social security contributions.



The Payment of Wages (Amendment) (Tips and Gratuities) Bill

One of the main areas of this Bill seeks to make it illegal for employers to use tips and gratuities to make up contractual wages or the salary of employees, whilst it is our understanding that this unfortunate practice was utilized by a minority of employers, we welcome this element of the Bill which will provide greater confidence and security for employees regarding wages.

Statutory Sick Pay Scheme

The General Scheme of the Sick Leave Bill 2021 is due to make its passage through Dáil Eireann this year. The Joint Committee on Enterprise, Trade and Employment published a Report on Bill in February 2022. This Bill which was drafted with consideration of the consultation in 2020 which the Restaurants Association of Ireland alongside other representative bodies contributed to. It further establishes Ireland as an EU member state in line with the social security contributions of other member states.

Pension Auto- Enrolment Scheme

Consultation and Strawman compiled in 2019 and the Restaurants Association of Ireland contributed to this consultation process. Minister Heather Humphreys announced on 21st February 2022 that rollout of the Scheme is now scheduled to commence in 2023. Another Social Security contribution that employers will, as of 2023 have compulsory engagement with.

The above three pieces of legislation which will all likely be in operation by 2023 see Ireland's position as being significantly improved from a European comparison to social security contributions. Our previous lack of employer contributions, which is now imminently to be addressed has been mentioned in the most recent Dáil term by the Tánaiste and Minister Varadkar and Minister for Finance Paschal Donohoe as going hand in hand with Ireland having one of the highest minimum wage rates in Europe. Effectively it has been accepted that the lack of one has balanced out the higher level of the other. Now is the time to consider balance between the two, with social security contributions in place the minimum wage rate should stay as its current rate for the next Budget year.

Hospitality Business Outlook

It must be acknowledged that inflation at its current rate and the pressure on the cost and sourcing of produce as a result of the conflict in Ukraine have contributed to the cost of living undoubtedly increasing. What must also be acknowledged is that the cost of doing business has also increased, and arguably at a greater rate.

A Hospitality Business Sentiment Survey conducted by Kroll in February 2022 found the following:

- 54% of respondents identify as micro (less than 10 employees)
- 48% say trading performance will be below pre-pandemic levels for 2022
- Biggest issues for 2022: 54% said staff and 41% said rising costs
- 81% believe they will have to increase staff wages
- 72% said no or not sure to being adequately resourced from a working capital standpoint following withdrawal of Government supports

The above responses provide a stark picture of the business cost pressures that the mostly micro hospitality enterprises in Ireland are facing into in 2022. This should be considered when determining not only if an increase in the national minimum wage is warranted but if an entire mostly indigenous economic sector would survive such an increase when cost pressures are at such a level.

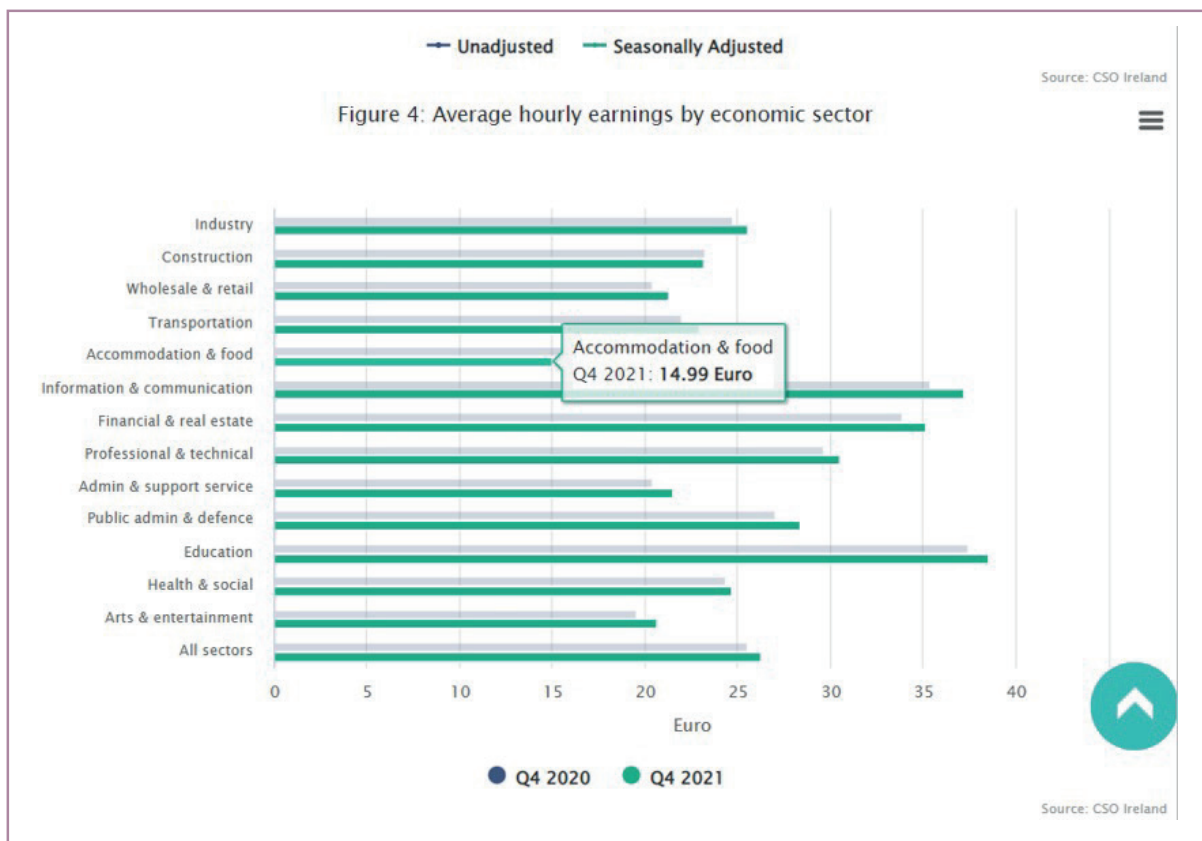


COVID Supports

The Employment Wage Subsidy Scheme (EWSS) and the Temporary Wage Subsidy Scheme (TWSS) before it, were and are a lifeline for the entire tourism and hospitality sector during the trading restrictions over the last 2 years and for the recovery period following the lifting of restrictions. It should be noted that whilst this support was vital it has in some instances contributed to the inflation of wages without some employers having consideration of its temporary nature. This is evidenced in an increase in the average hourly earnings in Accommodation & food sectors to €15.66 in Q4 2020 and a fall off by €0.67 in Q4 2021 which can be linked to a reduction in the EWSS rates available to businesses in this 12-month period. EWSS will cease completely for all employers at the end of May 2022, which furthermore demonstrates the need to maintain the minimum wage at its current rate so that a true picture can be established of what the various sectors including Accommodation and Food's true wage rates are following the cessation of government wage subsidies. The subsidies to date have provided a skewed picture of the wage rates in sectors and the overall economy due to subsidization over the last two years.

As evidenced in the table below, the recent CSO release: Earnings and Labour Costs Q3 2021 (Final) Q4 2021 (Preliminary Estimates) demonstrate the average hourly earnings within Accommodation and Food (which as per NACE utilized by CSO, it should be noted includes all food enterprises within the sector, including takeaway and highly automated food to go which provide for a different skillset and level of remuneration to a full-service restaurant for example). The hospitality sector is disproportionately the largest employer of the youth workforce which engage mostly on a seasonal and part time basis which contributes to the overall hourly earnings but can skew the figure for full time skill workers with careers in the sector.

It should be noted that the average weekly earnings for the sector as per the CSO figure below are €14.99 in Q4 2021 which is €2.09 above the calculated living wage.



The current national minimum wage rate of €10.50 should be maintained in the upcoming budget for 2023 due to the ongoing rise in inflation, impact on fuel and produce due to the conflict in Ukraine and until, following the cessation of COVID related wage supports, a true picture of the labour market and wage rates can be established. Similarly, Ireland's position on wage rates and social security contributions by employers must be established following the implementation of legislation in 2023 so an appropriate benchmark can be established of Ireland compared to other EU member states

ACTION:

- No further increase in minimum wage in the short term

c) 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 into 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 into account where a neighbouring property has benefited 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



d) Planning Permissions

The Instance of COVID 19 highlighted to the public and legislators what the hospitality industry has been highlighting for some time, that there is a need to overhaul planning and licensing for businesses.

Section 5.2 of the Town Centre Plus Policy Document “Building Better Data” – We could not agree more, an analysis of all facilities and amenities should be available for future planning, be it urban or rural regeneration, new housing or indeed Tourism promotion and renewal. To facilitate this a register should be kept of all food businesses in the country which are an integral part of social structure in communities and the Tourism offering.

Minister O’Brien’s announcement in February 2022 “No planning permission needed for conversion of vacant pubs into homes under new regulations” is a welcome step in the updating of planning regulations but we would welcome under the Town Centre First Policy, a broad overhaul of the exemptions for planning permissions.

As part of the Town Centre First Policy there should be consideration of an updated Over the Shop Policy. Businesses should be given grants and / or tax credits to sustainably convert vacant over the shop/ pub/ restaurant premises for housing. There must simultaneously be a review of how this safely and feasibly can be done in the current regulatory environment and if needed the current planning permissions / change of use and fire safety criteria must be reviewed to ensure that they still keep health and safety at the forefront but that they are not prohibitive to utilising vacant premises.

It is acknowledged that there are now full-time Vacant Homes Officers in every Local Authority but our ask is for consideration of a vacant premises review under the remit of this office in each Local Authority. To regenerate towns in all areas of the country there needs to be a review of any vacant premises regardless of currently listed use.

ACTION:

- Review of regulations & potential barriers regarding conversion of Over the Shop to Residential

Takeaway & Delivery

S.I. No. 92 of 2020 - Planning and Development Act 2000 (Exempted Development) (No 2) Regulations 2020 sought to exempt hospitality businesses from requirements under Section 28 Guidelines for Planning Authorities from March 2020 until 31st December 2021. This exemption providing for restaurants and other food operators to operate as a takeaway and delivery without needing to apply for planning permission or a change of use to do so. It must now be acknowledged that the recovery of hospitality will be long term and for the survival of hospitality businesses a blended approach or indoor and outdoor dining and takeaway and delivery must be permitted. The legislation must be reviewed to permit the continuation of takeaway and delivery for indoor dining food businesses who operate such services as a percentage of their operation.

Classification & Register of Hospitality Businesses in Ireland

The recent COVID-19 restrictions highlighted once again a glaring need for a register with a state or semi state body of food businesses in Ireland. There is currently no definitive and real time register of food businesses by category in Ireland.



When the €9 meal legislation as part of trading restrictions was enacted it provided that businesses were required to provide a substantial meal to all patrons seeking to purchase and consume alcohol. Prior and following the enactment of this legislation the Restaurants Association of Ireland was contacted by Journalists, our own members owning cafés and restaurants and indeed even TDs and Senators. The query we received was, who was registered as a restaurant in Ireland, and the Association had to confirm to all parties that the Restaurant Certificate and Special Restaurant Licence both widely spoken off at the time are the names of alcohol licences and are not certification or a register for restaurants or other food businesses in Ireland. These alcohol licences are not a legal requirement for a restaurant to operate and can be applied for at the discretion of the business should it wish to serve alcohol, for which they are a legal requirement.

Current Registers

Currently the Food Safety Authority of Ireland (FSAI) through the HSE has a register of businesses who serve and sell food for consumption. There is a legal requirement for any business selling food and or drink for consumption to register with their local Environmental Health Office (EHO). This register is maintained and utilised for the purposes of inspection and compliance with food safety legislation. Whilst this is and should be a comprehensive register of the various categories of food businesses in the country, two issues exist at present. Businesses are categorized by risk rather than specific food service activity and these listings are only available to the EHO and subsequently to the HSE and FSAI under which they have been given their remit.

Accommodation Register

In contrast to other hospitality businesses, all Hotels are registered through Failte Ireland annually and all Pubs / Nightclubs are registered with Revenue through alcohol licensing. Section 8 (1)(c) of the National Tourism Development Authority Act 2003 which outlines the role and function of Failte Ireland requires it to “establish and maintain registers of hotels, guesthouses, holiday camps, holiday hostels, caravan sites, camping sites, approved holiday cottages, holiday apartments, motor hotels and youth hostels.”

Despite the Authority (Failte Ireland) having remit for Tourism and all of Hospitality during the COVID pandemic – specifically the administration of grants, the publication of Guidelines for Opening etc and through the Tourism & Hospitality Advisory Group, they do not keep or maintain a register of food business or indeed food tourism businesses. This in particular is of note as during the pandemic, a cohort of support grants were made available to hospitality businesses, with Failte Ireland given the remit to administer the grant process. A decision was taken that certain grant aid funding would be made available to “food tourism” businesses rather than food businesses broadly, this is despite there currently being no register or listing of such a subcategory of food service businesses in Ireland.

Tourism Promotion & Planning

Failte Ireland, in consultation with the Department of Tourism and Housing is commencing a register of short-term lettings. At a recent briefing of the Tourism Advisory Group, which commenced in 2020 and is chaired by Failte Ireland, food and drink businesses were described as a vital supporting actor to traditional tourism visitor sites. Planning is underway by Failte Ireland to recommence and refresh promotion of tourism destinations, including the Wild Atlantic Way and Hidden Heartlands, a register of local food and drink establishments can only further strengthen offerings and provide greater clarity of what is available and/or gaps in the market when planning the promotion of destinations.



NACE

Currently the CSO, Workplace Relations Commission (WRC) and various state and semi-state bodies utilise for reporting purposes the NACE - Statistical Classification of Economic Activities in the European Community, under which Accommodation and Food Service Activities come under “I” and subcategories of “55 Accommodation” and “56 Food and beverage service activities”.

Eurostat defines this sector as, “This item includes: This section includes the provision of short-stay accommodation for visitors and other travellers and the provision of complete meals and drinks fit for immediate consumption. The amount and type of supplementary services provided within this section can vary widely.” With the latter description of note, detailing that the section can vary widely. Whilst it is best practice for international benchmarking that we as a nation and member of the European Union continue to classify the sector broadly under NACE, it would make an abundance of sense, for reasons of clarity and ease of administering various visas, regulations, supports and the various reasons outlined above, to subcategories at a National Level. With accommodation already having a register, it makes sense for a food register defining and locating the various subcategories.

Summary

Once again during COVID restrictions this lack of classification came to the fore when food businesses were restricted from operating indoor and outdoor dining for public safety but could offer takeaway and delivery. This required a waiver on the planning permission that would ordinarily apply for a business to seek a change of use from a restaurant to a takeaway⁴. Planning permissions in a broad and unmaintained way have sought to define and list food businesses in the subcategories of restaurants or takeaways but once again this is not a register or definitive in detail when it comes to the various subcategories, once again highlighting the need for such.

A register of food businesses broken down by categories is required which should include categories such as full-service restaurant, café, gastropub, food serving pub, food to go, deli, quick food service and takeaway. This would better facilitate a myriad of Government services and supports, including but not limited to, work permits, economic reports, licensing for Fats, Oils and Greases and water, reports regarding skills and economic input etc. For example: currently non-EEA work permits are available for employment for chefs, but a takeaway business cannot apply. However there is no single national register that currently differentiates between a takeaway and a restaurant who offers takeaway.

ACTION:

- A single National register of food businesses

⁴ Planning and Development Act 2000 (Exempted Development) (No. 3) Regulations 2021



e) Other Business Costs

Outdoor Seating Charges

Whilst Central Government has taken action to instruct Local Authorities to waive fees in the last number of months to encourage outdoor dining, this step should be considered as part of urban regeneration following the pandemic. 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
- 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 was announced by Dublin City Council that this charge would 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. The recent writing off of such charges in light of the initial reopening period of outdoor dining highlights the need for a review and consistency from local authorities regarding these charges across the country.

There should be a National Policy of outdoor dining infrastructure and an abolishment of fees associated with such outdoor dining infrastructure. Applications should still be required to Local Authorities to ensure the areas and furniture are appropriate at a local level for the space and to ensure accessibility for all users however fees associated with outdoor dining should be scrapped.

ACTION:

- A review of local authority charges to provide greater consistency and accountability for rate payers and also to ensure that Local Authorities are supporting businesses to operate within public health guidance and facilitating outdoor seating areas

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” in 2019, 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. Currently a hospitality business can be subjected to multiple inspections from a myriad of inspection bodies at different times, such 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 and three years on from that report calls for action on that recommendation.

ACTION:

- Undertake a review of the regulatory systems that affect businesses

4) TOURISM BUDGET

The Restaurants Association of Ireland is a member of The Irish Tourism Industry Confederation (ITIC) and concurs with the below policy asks regarding the wider Tourism and Hospitality Sector in Ireland, funding and sustainability.

Pro-business policies from Government to enable tourism sector to thrive

The vast majority of tourism and hospitality businesses are SMEs and profit margins are modest due to the often seasonal aspect of tourism and the labour-intensive nature of the sector. Government must do all within its power to pursue pro-enterprise and pro-competitive policies.

Maintain tourism investment at current levels

It is welcome that tourism investment increased in the last budget as business continuity grants and much needed increased overseas marketing funding was put in place. It is vital that such funding remains to allow agencies to invest in key sustainable tourism initiatives for industry. Investment in overseas marketing will also need to be retained at current levels so that Ireland maintains global awareness as a holiday destination.

Staff retention and recruitment incentive

Staffing issues and a labour-supply shortage are a significant barrier to recovery for Irish tourism and measures must be put in place to assist the commercial viability of industry. Fáilte Ireland, the National Tourism Development Authority, in February 2022 estimated that there were 40,000 vacancies within tourism and hospitality. With Ireland at near full employment these vacancies are likely to only be filled by EU residents or non-EU nationals. In that context agencies should assist industry in recruitment roadshows overseas and work permits must be fast-tracked. It is incumbent on industry to make the tourism and hospitality sector as attractive as possible for new entrants and ensure that current employees see a rewarding career path.

Support the competitiveness of Irish tourism

Commercial viability is critical for enterprises and the soaring costs of business risk impeding recovery. Energy costs, insurance hikes and labour increases are all hurting business and government must work to suppress inflation.

Tourism as a long-term career choice

Pre-pandemic the tourism sector employed 1 in 10 people and in tourism 'hotspots' such as Killarney this grew to 1 in 7 jobs. It is critical that these jobs become long-standing careers if possible and staff attrition (a worldwide phenomenon) is reduced. Initiatives should be supported to improve the quality of jobs across the tourism and hospitality sector, ensure career progression, and make the sector as attractive as possible to new recruits. Along with the work of Fáilte Ireland, the Department of Further and Higher Education must take a more proactive role in positioning tourism as a career of choice supporting the development and redesign of tourism education programmes and ensuring the co-ordination of course content at national level.



Enhance and improve research data relating to visitors and residents

Alongside the reinstatement of Tourism reporting by the CSO new forms of research and data collection need to be made available to Ireland's tourism industry including from the banking and telecoms providers. Such data can be anonymised and reported on in real time and can give strong feedback to industry and policymakers as to visitor behaviour, spend, regional location and other valuable insights. Fáilte Ireland should be supported in their efforts in this area and should be resourced appropriately.

Improve regional and seasonal penetration of tourism to benefit communities and provide employment

The regional spread of tourism across all regions is very important for sustainability purposes and all efforts should be supported to ensure that visitor volume and value is spread as equitably as possible.

Sustainability:

- Set baseline and emission targets now to achieve individual and 2030 & 2050 sector goals
- Provide finance and investment to industry for the transition
- Roll out carbon calculator for businesses
- Roll out Climate Action toolkit for industry
- Simplify planning to allow for expedited energy efficiency developments
- Incentivise businesses to apply for environmental accreditation
- An industry representative on Reducing Food Waste Prevention taskforce



5) 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:

- Drinks 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 sustained on a pre-Covid basis thousands of enterprises and approximately 90,000 jobs supported directly and indirectly in drinks manufacturing, drinks retail and wholesale distribution and visitor centres throughout the country and contribute to the much larger number of jobs in the wider hospitality and tourism sector.

DIGI repeats its recommendation from last year and recommends that Budget 2023 should reduce alcohol excise rates by 7.5%. This should be the first stage in a longer-term programme of bringing Ireland's alcohol excise into line with our partner countries in the EU and our closest neighbour, the UK. There should be a 15% reduction in excise rates over the next two budgets with a 7.5% reduction in each year followed by additional reductions thereafter. These are proportionate, reasonable and affordable reductions given current economic and public financial circumstances on the long-term path to average EU excise levels.

Very high excise levels by EU standards impact negatively on the national, regional and local economies currently and in the medium to long terms.

The annual 7.5% reduction in alcohol excise over two budgets would have the broad effect of improving Irish economic competitiveness and strengthening the business model of drinks enterprises to deal with the ongoing new environment of high inflation, Covid legacy issues, higher business costs and labour shortages in the post-Covid world. Excise reduction will support the business strength and capability of Irish drinks manufacturers that will, in turn, assist in the drinks export drive which should be supported by a solid domestic market. This will ensure a boost for the rural economy, agriculture sector and exports. Alcohol tax is a regressive and inequitable tax and is

very high by EU standards. It reduces tourism competitiveness and weakens enterprises. Excise is unfair in that it is imposed on relatively few sectors and alcohol excise is excessive by EU standards.

DIGI recommends that: There should be a reduction of 7.5% in alcohol excise in Budget 2023. This should be followed by a further 7.5% reduction in Budget 2024 and ongoing reductions thereafter to bring Ireland into line with average EU levels.



Reasons for excise reduction

The primary reasons for the proposed alcohol excise reduction are.

- Lower excise rates would improve the commercial model and viability of drinks enterprises, enabling them to retain a larger share of customer receipts which will support investment and sustainability in the higher cost and high inflation environment of 2022 and beyond. Excise is a substantial cost on drinks enterprises.
- Irish alcohol excise tax rates are very high relative to the great majority of EU economies. This is a self-imposed competitive disadvantage on Irish operators.
- High Irish alcohol excise rates reduce competitiveness and have a strong negative impact on the commercial viability of Irish drinks enterprises. High excise levels make a large gap between consumers' expenditure and enterprises' receipts.
- Excise reduction will enable the sector to generate and sustain high levels of national and regional job creation especially for young workers into the future.
- It would contribute to the fight against inflation.

The large negative economic impact on sectors of the drinks industry of Covid-related closures and restrictions are well known and appreciated by Government. In addition to the above issues the sector along with the rest of the economy faces the difficulties of high inflation rates and substantial input cost increases.

ACTION:

- Alcohol excise should be reduced by 7.5% in Budget 2023. This should be part of the effort to move towards the lower EU norms for alcohol excise. The 2023 reduction should be followed in Budget 2024 with another 7.5% reduction.



6) NATIONAL TOURISM POLICY

a) Review of Tourism State Agencies

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. For this reason we are calling for a review of State Agencies responsible for the development and promotion of tourism to ensure that current state agencies are fit for purpose and tasked with work that prioritises the industry's needs. Also important in this time of economic uncertainty is to ensure no duplication of work or campaigns across agencies.

ACTION:

- Review of State Agencies tasked with development and promotion of Tourism

b) Restaurant & Hospitality Forum

Under the Department of Business, Enterprise and Innovation now led by Minister for Enterprise, Trade and Employment and Tanaiste Leo Varadkar there is a Retail Consultation Forum. This forum was established under the Action Plan for Jobs 2014 to provide a platform for structured engagement between the retail sector and relevant Government Departments with the intended purpose to allow key issues of relevance to the retail sector to be discussed, with a view to identifying practical actions which could be taken by Government, or by industry itself.

A Restaurant and Hospitality Forum needs to be established in order to identify practical actions for the sector, particularly with restaurants and hospitality being one of the most significantly and negatively impacted upon by COVID 19 with continued trading restrictions remaining in place. The temporary establishment of the Indoor Hospitality Working Group was welcome but recovery is ongoing and in order to ensure a successful and sustained restaurant and hospitality sector a permanent forum under the Department of Enterprise, Trade and Employment must be established.

ACTION:

- Establishment of a Restaurant & Hospitality Forum

c) Industry Developed Tourism Policy

COVID 19 has and continues to have a significant impact on the Tourism and Hospitality Sector. The sector will take significant time to recover and the progression of any recovery and to ensure it is sustainable requires a roundtable of the various and broad tourism sub sectors to develop a policy for the sector developed by the sector. Utilising the coal face knowledge and years of experience that businesses and tourism professionals have will be invaluable for the recovery. The Government's Tourism Policy Statement: People, Place and Policy – Growing Tourism to 2025 and indeed the Tourism Leadership Group as formed in 2019, are, in light of COVID in need of broader contributions, skillsets and subsectors of the Tourism industry, to best inform a plan for the sectors long recovery period ahead.

ACTION:

- Industry Developed Tourism Policy



d) 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.

ACTION:

- Establish a Tourism Satellite Account to enable transparent and accurate recording of tourism data



7) 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
- Relaxation
- Diet

The Restaurants Association of Ireland (RAI) believe that this 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 Aware's Incredible Edibles and Pasture to Plate initiatives.

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 were disappointed to see that the report from the Joint Committee on Children and Youth Affairs (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. It is important to note that this Report is now over 2 and a half years old.

The Healthy Ireland Strategic Action Plan 2021-2025 launched in May 2021 stated a 2021 Priority to "Establish a new Primary School Healthy Eating education programme" which is welcome but simply does not go far enough. The RAI have long lobbied for better food education for children. We welcome the recommendation from the JCCYA 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



8) SUMMARY OF ACTIONS

Tourism % Hospitality VAT Rate

ACTION:

- Extend 9% VAT Rate for two further years to 2025

Recruitment

ACTION:

- Statutory Instrument by Minister for Enterprise, Trade & Employment to move occupations of Executive Chef, Head Chef, Sous Chef, and Chef de Partie to Critical Skills Work Permits
- Removal of the following occupations from the Ineligible Occupations List making them applicable for general work permits:
 - 1221 Hotel and accommodation managers
 - 1223 Restaurant and catering establishment managers (Food & Beverage Manager & Restaurant Supervisor Applicable)
 - 1224 Publicans and managers of licensed premises
 - 5436 Catering and Bar Managers (Food & Beverage Manager & Restaurant Supervisor Applicable)
- Resourcing of Government Departments and Sections to ensure timely processing of applications critical for workers and businesses; visas, work permits and PPS numbers. Adequate resourcing of the Workplace Relations Commission to ensure continued inspections and relevant investigations and oversight of employment law.

National Tourism and Hospitality Training Authority

ACTION:

- Establish a National Tourism and Hospitality Training Authority

Insurance

ACTION:

- Enactment and commencement this year of duty of care amendments to the Occupiers Liability Act 1995
- Enactment and commencement this year of the Personal Injuries Resolution Board Bill 2022
- Rapid consolidation of the Judicial Guidelines in the courts and transparency as to awards in cases where the Guidelines apply
- An acceleration of the work of the Insurance Competition Office at the Department of Finance to ensure the entry of more underwriters into the Irish liability insurance market

Labour Costs

ACTION:

- No further increase in minimum wage in the short term



Commercial Rates

ACTION:

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

Planning Permission

ACTION:

- Review of regulations & potential barriers regarding conversion of Over the Shop to Residential

Registry of Food Businesses in Ireland

ACTION:

- A single National register of food businesses

Outdoor Seating Charges

ACTION:

- A review of local authority charges to provide greater consistency and accountability for rate payers and also to ensure that Local Authorities are supporting businesses to operate within public health guidance and facilitating outdoor seating areas

Utility Costs

ACTION:

- Undertake a review of the regulatory systems that affect businesses

Tourism Budget

ACTION:

- Pro-business policies from Government to enable tourism sector to thrive
- Maintain tourism investment at current levels
- Staff retention and recruitment incentive
- Support the competitiveness of Irish tourism
- Tourism as a long-term career choice
- Enhance and improve research data relating to visitors and residents
- Improve regional and seasonal penetration of tourism to benefit communities and provide employment
- Sustainability:
 - Set baseline and emission targets now to achieve individual and 2030 & 2050 sector goals
 - Provide finance and investment to industry for the transition
 - Roll out carbon calculator for businesses
 - Roll out Climate Action toolkit for industry
 - Simplify planning to allow for expedited energy efficiency developments
 - Incentivise businesses to apply for environmental accreditation
 - An industry representative on Reducing Food Waste Prevention taskforce



Excise Duty**ACTION:**

- Alcohol excise should be reduced by 7.5% in Budget 2023. This should be part of the effort to move towards the lower EU norms for alcohol excise. The 2023 reduction should be followed in Budget 2024 with another 7.5% reduction

Review of Tourism State Agencies**ACTION:**

- Review of State Agencies tasked with development and promotion of Tourism

Restaurant & Hospitality Forum**ACTION:**

- Establishment of a Restaurant & Hospitality Forum

Industry Developed Tourism Policy**ACTION:**

- Industry Developed Tourism Policy for the Future

Tourism Satellite Account**ACTION:**

- Establish a Tourism Satellite Account to enable transparent and accurate recording of tourism data

National Food Education Policy**ACTION:**

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





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