





# **HERIT ADAPT**



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**HERIT ADAPT Pilot Projects** 

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areas

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# Abstract

The present document represents an internal report of the HERIT ADAPT project detailing the provision of a template for the collection of information related to Activities 1.1, 1.2 and 1.4 of the project.

Each SWOT analysis evaluates the strengths, weaknesses, opportunities, and threats associated with the tourism landscape in these regions, with a focus on resilience, cultural heritage, and environmental sustainability. By examining the evolution of legal and policy frameworks, including international influences and local adaptation strategies, these analyses provide a comprehensive understanding of the current landscape and anticipated regulatory shifts impacting tourism. The analysis covers three primary areas: (1) Legal and Policy Frameworks, which focus on the effectiveness of existing laws and policies for promoting sustainable tourism and climate adaptation; (2) Strategies and Action Plans, which evaluate the practical implementation of measures aimed at climate resilience, urban planning, and heritage protection; and (3) Interconnections between tourism, environmental conservation, and urban development, highlighting synergies that could bolster sustainable growth.

Data was collected through document reviews, interviews with key policymakers, and observational studies, enabling an in-depth evaluation of on-ground practices. The SWOT framework identifies critical strengths, including established legal protections and strong stakeholder collaboration, while addressing weaknesses such as funding constraints and infrastructural gaps. Opportunities include aligning regional policies with EU standards, leveraging smart technologies, and diversifying tourism to alleviate seasonal strain. However, external threats like climate change, regulatory fragmentation, and global tourism pressures pose significant challenges.

This SWOT analysis aims to provide actionable insights for each region, equipping stakeholders with strategies to enhance resilience, protect heritage, and support sustainable tourism. By fostering an environment conducive to long-term sustainability, the project helps these regions balance tourism growth with the preservation of cultural and environmental legacies.

# **Project Partners**

Organization	Abbreviation	Country
Region of Western Greece	RWG	GR
ATHENA, Research and Innovation Centre in Information,	ATHENA	GR
Communication and Knowledge Technologies, Industrial		
Systems Institute		
European Public Law Organization	EPLO	GR
Sapienza University of Rome	SDR	IT
Municipality of Genoa	COMGE	IT
Dubrovnik Development Agency DURA	DURA	HR
Limassol Tourism Development and Promotion Co Ltd	LTC	CY
Old Royal Capital Cetinje	PCT/ORCC	ME
University of Granada	UGR	ES
Regional Tourism Agency Occitanie	CRTL	FR

Ministry of Tourism of the Republic of Bulgaria	MTRB	BR	
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# **Document History**

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# Introduction

Through the use of SWOT dedicated to the analysis of both internal and external surroundings, a systematic approach is obtained to assess internal and external factors and then support the decision position in the good alignment between internal and external issues (Silverman et al., 2014), as well as potentials and pitfalls, which guarantees a fact-based, data-driven insight on planning decisions and course of actions, thus providing a good basis for strategy definition (Kajanus, 2004). The strengths and weaknesses are spotted through internal environmental assessment, while the opportunities and threats are spotted through the external environment assessment (Mojaveri & Fazlollahtabar, 2012). This provides a fact-based and data-driven perspective into planning decisions and actions, as well as a solid foundation for identifying strategy (Kajanus et al, 2004). By defining strengths, weaknesses, opportunities, and threats, strategies can be based on their strengths, elimination of weaknesses, using opportunities to counter threats.

The SWOT analysis was firstly developed for business and market analysis and it is currently extensively implemented in planning and management and adopted in many fields for research assistance in order to evaluate potential bottlenecks or opportunities to prioritize development and/or management strategies (Falcone et al., 2020). The knowledge obtained can be systematically presented in a matrix as many categories of the matrix's four variables, which, if applied in a true way, supply a strong essential for strategy development Strengths may enhance overall performances and provide an advantage, whereas Weaknesses may affect efficiency, profitability and competitive advantage. Opportunities are possibilities, which may contribute to exploit advantage or add additional advantage, whereas threats may generate problems and retrieve successful development and implementation of any strategy.

# Objective

The primary objective of each individual SWOT analysis within the HERIT ADAPT pilot projects is to conduct a comprehensive investigation and evaluation of all pertinent legal, regulatory, and policy frameworks that influence the sustainability and resilience of tourism in the territories of the project partners. This analysis aims to provide a thorough understanding of how these frameworks shape and impact tourism activities, with a special emphasis on their interconnection with cultural heritage, environmental legacy, and overall sustainability. Key elements of the objective include:

### **Legal and Regulatory Frameworks:**

- Examine the evolution and current state of legal frameworks related to tourism, the environment, and cultural heritage.
- Assess the impact of international legal influences, such as conventions and treaties, on national legislation in these domains.
- Identify and evaluate current and anticipated changes in legislation that could affect tourism, environmental conservation, and cultural heritage protection.

## **Policy Frameworks:**

- Analyse existing policy frameworks aimed at promoting sustainable tourism development, including climate change mitigation and adaptation policies.
- Investigate policies that encourage community engagement in tourism and heritage conservation.
- Review urban agendas and other strategic policies that integrate sustainability and resilience into tourism planning.

### **Strategies and Action Plans:**

- Identify and assess the effectiveness of existing strategies and action plans for sustainable tourism, including those addressing climate change (e.g., SEACAP), urban development, and cultural heritage protection.
- Evaluate the implementation status and success of these strategies in achieving their intended goals.

## **Interconnections:**

- Explore the relationships between tourism, cultural heritage, environmental legacy, and urban development.
- Assess how these interconnections contribute to or hinder sustainable and resilient tourism development.

## Sustainability and Resilience:

- Emphasize strategies and action plans designed to enhance the sustainability and resilience of tourism in the project territories.
- Investigate the role of climate change adaptation and mitigation measures in supporting sustainable tourism practices.

## **Impact on Development:**

- Assess the overall impact of legal, regulatory, and policy frameworks on the sustainable development of tourism in the project territories.
- Identify best practices and potential areas for improvement to ensure that tourism development aligns with the principles of sustainability and resilience.

The ultimate goal of this comprehensive SWOT analysis is to provide actionable insights and recommendations that will support the project partners in achieving sustainable and resilient tourism development. By thoroughly understanding the legal, regulatory, and policy landscape, the project aims to foster an environment where tourism can thrive while preserving and enhancing cultural and environmental heritage for future generations.

# Methodology

# **Data Collection**

Data for the SWOT analysis was collected through a combination of document review, interviews with key stakeholders, and observational studies.

#### Document review

 This involves examining existing legal frameworks, policy documents, strategies, and action plans relevant to tourism, environmental conservation, and cultural heritage protection. (partially done trough Activity 1.2.)

#### Interviews

o In-depth interviews conducted with policy makers, including heads of tourism departments and heads of administrative departments for communal activities and environmental protection in the cities and/or regions. These interviews provide qualitative insights into the effectiveness and challenges of current frameworks and practices.

#### Observational studies

 Field observations conducted to assess the on-ground implementation of policies and the state of infrastructure related to tourism and heritage conservation.

# **SWOT Framework Implementation**

The SWOT framework was implemented by categorizing the findings from data collection into four main areas:

- Strengths: Identifying existing strengths in legal frameworks, policy strategies, stakeholder engagement, and infrastructure that support sustainable tourism and heritage conservation.
- **Weaknesses**: Highlighting areas of regulatory inconsistencies, funding limitations, infrastructural deficiencies, and gaps in data and monitoring processes that hinder effective implementation of sustainability strategies.
- **Opportunities**: Exploring potential areas for improving and harmonizing regulations, securing additional funding, integrating technology, and enhancing climate resilience.
- Threats: Recognizing external threats such as climate change, seasonal tourism fluctuations, global trends, and stakeholder engagement issues that could impede sustainable tourism development.

# Analysis and Interpretation

The collected data was analysed to identify key patterns and insights within each category of the SWOT framework. The preliminary results of the SWOT analysis should be reviewed by project

partners and experts in sustainable tourism and cultural heritage. Feedback from these reviews must be incorporated to refine the analysis and ensure its accuracy and relevance to the project's objectives.

# **SWOT** framework

Strengths	
Existing Legal	Strong and comprehensive legal frameworks for tourism, environme
Frameworks	and cultural heritage.
	Robust policies promoting sustainable tourism development.
Established	Well-defined policies addressing climate change mitigation a
Policy	adaptation.
Frameworks	
	Effective community engagement policies.
Strategic Action Plans	Existing tourism sustainability strategies with proven success.
	Detailed cultural heritage protection and disaster risk reduct
	strategies.
Stakeholder	Strong collaboration between government, private sector, and lo
Engagement	communities.
	Effective mechanisms for stakeholder engagement and conf
	resolution.
Weaknesses	
Regulatory	Inconsistencies in regulations across different territories hinder
	progress.
Inconsistencies:	progress.
Inconsistencies:	
	Legal and bureaucratic hurdles complicating implementation.
Funding	Legal and bureaucratic hurdles complicating implementation.
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Funding Limitations Infrastructure Deficiencies:	Legal and bureaucratic hurdles complicating implementation.  Common financial constraints affecting sustainable tourism practice.  Insufficient funding for infrastructure improvements and projectimplementation.  Deficient infrastructure supporting tourism and heritage preservation.
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Harmonizing Regulations	Potential to align regulatory frameworks across territories to reduce inconsistencies.
	Opportunity to develop integrated strategies balancing tourism growth with heritage conservation.
Securing	Identification of potential sources of funding and financial strategies to
Funding	address funding limitations.
	Increased investment in sustainable tourism and heritage conservation.
Technological Integration	Effective integration of technology for monitoring, managing, and promoting sustainable tourism.
	Utilization of global technological trends impacting tourism and heritage conservation.
Climate	Implementation of nature-based solutions and other measures to
Resilience:	enhance climate resilience.
	Adoption of strategies for climate change mitigation and adaptation.
Threats	
Climate Change	Significant challenges related to adapting tourism and heritage sites to
	the impacts of climate change.
	Increased risk from extreme weather events and other climate-related
	hazards.
Seasonal Tourism	Challenges related to managing seasonal fluctuations in tourism.
	Overdependence on peak seasons causing strain on resources and
	infrastructure.
Global Trends	External global trends and policies impacting local tourism and heritage
and Policies	conservation efforts.
	Social trends, such as changes in tourist behavior and preferences, affecting sustainability.
Stakeholder	Difficulties in effectively engaging key stakeholders across territories.
Engagement	
Issues	Potential conflicts among stakeholders, including government, private
	sector, and local communities.

# **SWOT Results**

# **Dubrovnik**

# Strengths

# Existing Legal Frameworks

# Strong and Comprehensive Legal Frameworks for Tourism, Environment, and Cultural Heritage

As a member state of the European Union, Croatia benefits from a robust and comprehensive legal framework that governs tourism, environmental protection, and cultural heritage. This framework ensures that Croatian cities, including Dubrovnik, adhere to both national and international regulations, decisions, directives, and conventions. The City of Dubrovnik, an administrative unit within the Republic of Croatia, operates under this legal umbrella, enabling the city's leadership—comprising the mayor, city council, and related institutions—to effectively govern tourism, environment, and cultural heritage management.

### Robust Policies Promoting Sustainable Tourism Development

Croatia also places a strong emphasis on sustainable tourism through national and local policies designed to align tourism growth with environmental sustainability and cultural heritage preservation. Some key strategies and policies include:

- Strategy for Sustainable Development of the Republic of Croatia (Official Gazette 30/2009)
- Spatial Development Strategy of the Republic of Croatia (Official Gazette 106/2017)
- Law on the System of Strategic Planning and Development Management of the Republic of Croatia (Official Gazette 123/2017)
- Sustainable Tourism Development Strategy until 2030 (Official Gazette 2/2023)

Furthermore, Croatia is actively refining its legal framework for tourism. New regulations, currently under public discussion, aim to enhance the **Law on Tourism** by defining key indicators for monitoring tourism development and sustainability, such as tourism carrying capacity and methodologies for drafting destination management plans. These improvements will provide clearer guidelines for sustainable tourism management at national and local levels.

# Established Institutions for Effective Oversight and Implementation

At the local level, public institutions such as the **Lokrum Reserve** and the **Public Institution for Managing Protected Areas of Dubrovnik-Neretva County** play a crucial role in implementing these legal frameworks. These institutions ensure

that Dubrovnik's natural and cultural sites are effectively managed and protected in line with national and EU legislation.

# **Progressive Sustainable Tourism Initiatives**

Dubrovnik has demonstrated significant progress in sustainable tourism initiatives, particularly through projects such as the "Respect the City" initiative, which focuses on managing tourism flow and preserving the city's cultural heritage. Additionally, the UNESCO World Heritage Site Management Plan for Dubrovnik's Old Town serves as a strong foundation for sustainable tourism management in the city, ensuring that both the local community and tourists benefit from a well-balanced approach to tourism development.

# Established Policy Frameworks

# Well-Defined Policies Addressing Climate Change Mitigation and Adaptation

Over the last decade, following Croatia's accession to the EU, the City of Dubrovnik and its institutions have made significant progress in developing policies and strategic documents aimed at addressing climate change mitigation and adaptation. A series of forward-looking plans and studies have been commissioned to ensure the city adapts to evolving environmental challenges while also mitigating its impact. Some of the key initiatives include:

- Program for Air Protection, Ozone Layer Protection, and Climate Change Mitigation for the City of Dubrovnik (2016-2020): A foundational document outlining policies for addressing air quality and climate-related challenges.
- Climate Change Adaptation Plan for the City of Dubrovnik (2019): A dedicated plan for adapting the city's infrastructure, economy, and tourism industry to the impacts of climate change.
- Integrated Action Plan for Dubrovnik as a Sustainable Tourism Destination (2022): This plan addresses sustainable tourism development by integrating environmental, economic, and social strategies.

Recent documents further strengthen Dubrovnik's commitment to climate action, specifically focusing on both mitigation and adaptation:

- 1. Action Plan "Respect the City!" until 2025 (2021): A policy roadmap that seeks to balance tourism flows and improve the quality of life for residents while addressing sustainability challenges.
- 2. **Dubrovnik Urban Area Development Strategy (2023)**: This strategy includes comprehensive planning for sustainable urban growth, with climate resilience at its core.
- 3. Environmental Protection Program of the City of Dubrovnik (2023): A program focused on protecting local ecosystems and reducing environmental degradation.
- 4. Sustainable Energy and Climate Action Plan (SECAP) for the City of Dubrovnik (2024): This key document aligns with EU climate goals and sets out strategies for reducing carbon emissions, promoting energy efficiency, and adapting to climate change.

These policies demonstrate Dubrovnik's strong legal and institutional framework for addressing the impacts of climate change, making it a leader in sustainable urban and tourism development within the region.

# **Effective Community Engagement Policies**

In addition to robust climate action strategies, Dubrovnik has developed effective community engagement mechanisms that allow local citizens to play an active role in shaping the city's future. According to the **Statute of the City of Dubrovnik (2021)**, residents are encouraged to participate in decision-making processes related to administration at the local committee or city district levels, fostering inclusive governance at the grassroots level.

The recent implementation of the **VOXPOPULI IT platform** has further enhanced community involvement. This online platform enables residents to engage in public discussions, vote on proposals, and participate in the city's budgeting process through participatory budgeting initiatives. This ensures that climate action and sustainable development policies are not only top-down but also involve the broader community, fostering a sense of ownership and accountability.

## Strategic Focus on Sustainability and Cultural Heritage

Dubrovnik's strategic documents, particularly those developed in accordance with **UNESCO guidelines**, underscore the city's commitment to sustainability. Cultural heritage is positioned as a vital component of the city's sustainable tourism development goals. This focus ensures that while tourism flourishes, Dubrovnik's unique cultural and historical assets are preserved and protected for future generations.

Sustainability is one of the five pillars of the city's framework for action
in cultural heritage, emphasizing its potential to strengthen social
capital, promote economic growth, and ensure environmental
sustainability. This approach integrates cultural heritage into broader
sustainability efforts, ensuring that Dubrovnik's development remains
both culturally enriching and environmentally responsible.

# Strategic Action Plans

### Existing Tourism Sustainability Strategies with Proven Success

The City of Dubrovnik has successfully implemented several tourism sustainability strategies that have had a positive impact on both the local tourism sector and the community. These strategies are built upon the strong national policies promoting sustainable tourism development and have been tailored to address the unique challenges of Dubrovnik's tourism-dependent economy. Some of the key strategic/action plans include:

 Development Strategy for Tourism and Provisions in Cruising Tourism in the Dubrovnik Area (2017): This strategy set the foundation for managing the growth of cruise tourism while balancing the needs of the local community and protecting the environment.

- Study of Sustainable Tourism Development and Carrying Capacity of the City of Dubrovnik with Action Plan (2020): This comprehensive study analysed the carrying capacity of Dubrovnik and provided actionable recommendations for managing tourism flows, reducing overcrowding, and maintaining sustainable growth.
- Action Plan "Respect the City!" (2021): Focused on reducing the negative impacts of mass tourism and fostering sustainable tourism practices, this action plan has been instrumental in managing visitor numbers, particularly from cruise tourism, and preserving the city's cultural heritage.
- Management Plan for the UNESCO World Heritage Site of the Old City
  of Dubrovnik (2021): This plan outlines strategies for sustainable
  tourism management in Dubrovnik's historic center, ensuring that the
  city's unique heritage is preserved while supporting tourism.
- Assessment of Tourism Carrying Capacity for UNESCO World Heritage Site of the Old City of Dubrovnik (2024): A newly developed document that sets daily visitor limits and guidelines to prevent overcrowding, ensuring the sustainability of tourism in the city's most fragile areas.

These strategic documents highlight Dubrovnik's success in balancing tourism development with environmental sustainability and heritage preservation, making the city a leader in sustainable tourism management.

## Detailed Cultural Heritage Protection and Disaster Risk Reduction Strategies

The protection of cultural heritage and the implementation of disaster risk reduction strategies are central to Dubrovnik's approach to sustainable tourism. The **Institute for the Restoration of Dubrovnik**, established in 1979, plays a pivotal role in leading these efforts. The institute has been involved in various projects aimed at safeguarding the city's heritage, while also addressing the risks posed by climate change and other natural disasters.

Key strategic documents in this area include:

- Management Plan for the UNESCO World Heritage Site of the Old City
  of Dubrovnik (2021): This comprehensive document not only
  addresses tourism management but also includes provisions for risk
  preparedness in case of emergencies.
- Risk Assessment in Case of Major Accidents for the City of Dubrovnik (2018): This document provides an overview of potential risks and outlines the city's preparedness measures in case of accidents or disasters, ensuring the protection of both residents and cultural assets.
- Risk Assessment (2024): A newly published risk assessment document that builds on earlier efforts, providing updated strategies for disaster preparedness and response, particularly concerning the city's cultural and historic sites.

These initiatives demonstrate Dubrovnik's commitment to preserving its cultural heritage while addressing the challenges posed by climate change and natural disasters.

# Integrated Spatial and Urban Planning

The city's spatial planning efforts are built on robust foundations, with strategic urban development plans that include mandatory studies and standards. Key elements include:

- City Spatial Plans and General Urban Plan: These documents ensure
  that urban development aligns with the city's sustainability goals,
  incorporating standards such as landscape plans and environmental
  protection measures.
- Carrying Capacity Plan for the Historic Core: This plan, which includes
  daily limits on the number of cruise ship passengers, effectively
  balances economic growth with the need to protect Dubrovnik's
  cultural and environmental assets.
- UNESCO Management Plan for the Old Town: A well-structured document that integrates environmental protection with cultural preservation, outlining ten key elements for sustainable tourism in the city.

### Risk Management Plan for Cultural Heritage

The city is in the process of developing a **Risk Management Plan for Cultural Heritage**, which will be the first document of its kind to establish formal procedures for managing cultural heritage in disaster risk reduction. This plan aims to ensure that Dubrovnik's invaluable heritage is safeguarded against future risks, such as natural disasters or the impacts of climate change.

# Stakeholder Engagement

# Strong Collaboration Between Government, Private Sector, and Local Communities

In Dubrovnik, there is a robust framework for collaboration between the government, private sector, and local communities. The **mayor and city council** actively engage with public and local interests, utilizing legal mechanisms that enable strong partnerships with the private sector. This collaboration is facilitated by several key institutions and programs:

- City's Administrative Department for EU Funds and Economy: This
  department plays a crucial role in enhancing business conditions and
  fostering economic development. It is responsible for implementing
  Integrated Territorial Investments (ITI), which focus on developing the
  Dubrovnik urban area. The department also coordinates its activities
  with DURA, the Dubrovnik Development Agency, which plays a central
  role in economic and social development initiatives.
- Entrepreneurship Centre of Dubrovnik-Neretva County Ltd.: Operating since the late 20th century, this business incubator provides critical

support for current and potential entrepreneurs, contributing to the region's economic vibrancy.

These collaborations between public institutions and private enterprises, alongside community input, ensure that economic growth aligns with local interests, fostering a sustainable and inclusive approach to tourism and urban development.

## Effective Mechanisms for Stakeholder Engagement and Conflict Resolution

Dubrovnik's legal and administrative frameworks provide effective mechanisms for stakeholder engagement and conflict resolution. The democratic nature of local governance allows for comprehensive involvement across various levels of society, facilitated by:

- Public Institutions and Local Self-Government Bodies: These entities
  ensure that citizens have a platform to express their views, participate
  in decision-making processes, and engage in discussions about issues
  affecting their community. This inclusive approach helps resolve
  conflicts and ensures that development plans reflect the needs and
  concerns of all stakeholders.
- Sociological Studies, Focus Groups, and Citizen Surveys: The city has
  undertaken numerous sociological studies and regularly uses focus
  groups and surveys to gather public opinions on various tourism and
  environmental issues. These methods ensure that residents' voices are
  heard and that the policies developed reflect the wider community's
  interests.
- UNESCO Site Management Plan: A key aspect of this plan is the Greenery Register, which aims to raise public awareness about the importance of preserving urban green spaces. The plan emphasizes the need for strong community involvement in heritage conservation and sustainable tourism efforts.
- Continuous Communication Among Tourism Stakeholders: Dubrovnik maintains an ongoing dialogue among all key tourism stakeholders, including government bodies, the private sector, and civil society organizations. The shared goal is to ensure that tourism benefits the local community while preserving the quality of life for residents. This requires a willingness to compromise and find solutions that balance economic interests with social and environmental considerations.

## Framework for Collaboration on Cultural Heritage and Tourism Management

The Institute for the Restoration of Dubrovnik plays a pivotal role in facilitating cooperation among various stakeholders. It works closely with the **executive board** responsible for implementing the UNESCO World Heritage Site management plan, fostering collaboration among public administration, citizen representatives, civil society organizations, and private sector partners. The Institute has established a strong framework for engaging stakeholders in executing the city's action plans, ensuring that cultural heritage preservation and sustainable tourism management are a shared responsibility across all sectors.

## Weaknesses

# Regulatory Inconsistencies

While Dubrovnik benefits from a strong legal framework for tourism, environmental protection, and cultural heritage, certain weaknesses, particularly in regulatory inconsistencies, hinder progress in key areas. These inconsistencies arise from discrepancies between local visions of development and broader regulations such as the EU Green Deal and the Nature Restoration Law. For instance, the law's specific targets, like achieving "no net loss of green urban space" and increasing tree cover by 2030, may conflict with short-term economic interests at the local level. In Dubrovnik, local development plans often prioritize construction and land use changes that could potentially reduce green space, creating tension between long-term sustainability goals and immediate economic ambitions.

Moreover, legal and bureaucratic hurdles complicate the implementation of these regulations. The same democratic mechanisms that encourage community participation in decision-making can also slow down the process of implementing necessary changes. Public discussions and the requirement for consensus, while essential for inclusive governance, often lead to delays, especially when conflicting interests emerge. This can make it challenging to align local projects with the most recent national and international regulations.

Frequent changes in laws and regulations at the national level add another layer of complexity, as adjustments in policies—such as those related to transportation, tourist facility categorization, minimum technical requirements in hospitality, and spatial planning—create new bureaucratic challenges. The enforcement of inspection oversight and adherence to these evolving regulations can also be inconsistent, further complicating the progress of sustainable development initiatives in Dubrovnik.

# Funding Limitations

Despite Dubrovnik's strong reputation as a profitable tourist destination, funding limitations remain a key weakness affecting sustainable tourism practices. The local budget is regulated by national legislation, such as the Budget Act and the Law on Local and Regional Self-Government, which often limits the flexibility of funding allocations, especially for long-term sustainability projects. Although the city generates substantial revenue from tourism, these financial constraints hinder the broader implementation of sustainable initiatives and infrastructure improvements.

One of the primary challenges is the insufficient funding for infrastructure improvements and the effective implementation of projects. While the City of Dubrovnik is capable of securing funds for infrastructure development, several strategic documents highlight the critical issue of insufficient human resources to carry out these projects. The city has been grappling with a long-standing shortage of highly skilled and motivated local professionals who can address sustainable development needs. This gap creates bottlenecks in project execution, delaying progress on key initiatives. As a result, additional funding is required, not just for infrastructure but also for the education and training of local talent or for attracting skilled experts from other parts of Croatia, Europe, or beyond.

**Historical financial constraints** further exacerbate the issue. Decades of financial strain, stemming from the **war damage** inflicted during the 1990s, continue to affect Dubrovnik's ability to fully recover and invest in new initiatives. This includes damage to **cultural heritage sites** and weakened infrastructure, such as tree structures on **Lokrum Island**, still suffering from shrapnel impact. These ongoing recovery costs divert resources from current sustainability projects.

Furthermore, the high costs of living and working in Dubrovnik, coupled with the burden on infrastructure from both tourism and local development, hinder efficiency in project implementation. The rising costs of goods and services, alongside the pressure on local infrastructure, make it difficult to allocate adequate funding for sustainable tourism efforts, compounding the financial challenges the city faces.

# Infrastructure Deficiencies

Infrastructure deficiencies in Dubrovnik significantly hinder its ability to support tourism and preserve cultural heritage effectively. Despite being a globally recognized tourist destination, many of the city's strategic plans and reports identify the transport network as inadequate, creating challenges for both daily operations and long-term development. The city's unique topography, combined with the high seasonality of tourism, exacerbates these challenges, making infrastructure design and day-to-day traffic management complex and problematic.

One of the most notable issues is the **significant traffic limitations** on both land and sea. On land, the city faces safety risks, limited accessibility for people with disabilities, and traffic congestion, particularly during peak tourist season. The situation is similarly problematic at sea, with **unstable ocean corridors** posing risks for maritime traffic. In particular, large delivery trucks—especially those transporting unnecessary bottled water (as tap water is safe to drink)—cause physical damage to **cultural heritage** sites. The **lack of parking spaces**, underdeveloped **public transportation network**, and poorly organized city roads further complicate traffic management and reduce the city's overall accessibility.

Additionally, **cultural offerings** in Dubrovnik are often viewed as **outdated** and unappealing, failing to meet the expectations of a contemporary tourist destination. Furthermore, the city is struggling with delays in the **waste management system**, specifically in establishing a county waste management centre. The **water supply and sewerage systems** also present significant deficiencies. **Water quality** is compromised during periods of intense rainfall, due to the city's karst geology, and the **sewerage system** is inadequate in handling extreme weather events. This issue came to the forefront during heavy storms in September 2024, revealing an urgent need for improvements in **stormwater runoff management**, especially as the frequency of extreme weather events is expected to rise.

A lack of **sustainable design principles** in new infrastructure projects is another critical weakness. While the city's development strategies and plans emphasize the importance of sustainability, there is a **disconnect between the rhetoric and practical implementation** of these principles in actual projects. This is likely tied to a shortage of qualified human resources capable of driving hands-on

sustainable infrastructure design. The **permitted excessive apartment development**, which compromises the landscape and local authenticity, along with the **loss of the city's "soul"** due to unregulated urban growth, further highlights the city's struggle to balance development with cultural and environmental preservation.

# Data and Monitoring

Weaknesses in Data and Monitoring present significant challenges for Dubrovnik's ability to manage tourism effectively and enforce environmental regulations. Despite some progress, such as initiatives from the Dubrovnik Smart City strategy (2015)—including Smart Parking, Dubrovnik Pass, Dubrovnik Eye, Dubrovnik Visitors, and Bus Web Shop—the city's digitalization efforts have been fragmented and project-based rather than part of a cohesive, integrated solution. As a result, there is limited availability of quantitative data to support qualitative findings and inform strategic decisions. For a tourist destination like Dubrovnik, having access to comprehensive data is crucial for managing tourism sustainably and addressing its associated challenges, such as environmental protection and infrastructure needs.

The lack of a true **digital transformation** is evident in the absence of embedded **smart city systems**—such as **sensors** and **edge computing**—which would allow for the continuous collection of critical data. Such systems are essential for monitoring visitor flows, traffic patterns, energy use, and environmental impacts, all of which contribute to more informed decision-making. Without this data, it becomes difficult to assess the success of tourism policies or to manage the city's carrying capacity effectively. Going forward, Dubrovnik will need to invest more in these technologies to create a **data-driven framework** for sustainable development.

In addition to data limitations, there are also issues with **insufficient monitoring** and enforcement of environmental regulations. The **State Inspectorate**, which is responsible for overseeing compliance with environmental laws, is understaffed, operating at just 65% of its capacity as of 2023. The **Sector for Environmental Protection**, **Nature Protection**, and **Water-Right Control** has only 37 employees, while the **Regional Office in Split** has a total of 209 staff members, which is insufficient for comprehensive monitoring across the region. This staffing shortfall hampers the inspectorate's ability to enforce regulations effectively, particularly in a city like Dubrovnik that is highly dependent on its natural and cultural assets for tourism.

The combination of **insufficient quantitative data** and **inadequate monitoring and enforcement mechanisms** weakens Dubrovnik's ability to manage its tourism industry and protect its environment. Addressing these gaps will require both technological investment in smart systems for data collection and a bolstering of human resources within the regulatory bodies responsible for environmental oversight.

# **Opportunities**

Harmonizing	Aligning Regulatory Frameworks
Regulations	There exists a significant opportunity for Dubrovnik to harmonize its regulatory
	frameworks across various territories, which would effectively reduce
	inconsistencies that currently hinder sustainable tourism and heritage

conservation efforts. This alignment can facilitate the development of integrated strategies that balance the growth of tourism with the preservation of cultural and natural heritage.

#### Potential for Year-Round Tourism

Cultural tourism development in Dubrovnik can be bolstered by leveraging the robust local cultural sector, which has a strong track record of organizing international performing arts events. By promoting year-round tourism, Dubrovnik can reduce the seasonal pressures on its infrastructure and resources, thus creating a more sustainable tourism model that benefits both visitors and residents.

# Cultural Tourism as a Primary Focus

The **Development Strategy for Culture** in the City of Dubrovnik emphasizes the importance of cultural tourism as the main form of tourism. Aligning local tourism initiatives with the guidelines set forth by leading organizations can enhance the city's appeal as a cultural destination, providing unique experiences that attract a diverse range of visitors.

### Development of Islands and Rural Areas

The development of island landscapes surrounding Dubrovnik presents an opportunity to incorporate traditional ways of life, such as fishing, mariculture, shipbuilding, and agriculture, into the tourism experience. Projects that adhere to the Smart Island guidelines in the Strategic Development Plan of the Dubrovnik-Neretva County can foster sustainable tourism while preserving local culture and traditions.

## Infrastructure Development and Traffic Connectivity:

The construction of the highway to Dubrovnik, coupled with the city's strategic position on the **Adriatic-Ionian Corridor**, presents an opportunity for significant improvements in road infrastructure and traffic connections. Enhanced transportation networks can facilitate smoother visitor access and improve logistical operations, benefiting both tourists and local residents.

# Public Administration Reform and Increased State Investment

Reforming public administration at the national level and increasing investments from the state budget, as outlined in the **Strategic Plan of the City of Dubrovnik**, can bolster local governance and enhance the implementation of sustainable tourism policies. Established public institutions effectively manage and protect local areas, such as the **Lokrum Reserve** and the **Public Institution for Managing Protected Areas of Dubrovnik-Neretva County**, ensuring proper oversight of regulations and conservation efforts.

### **Progressing Sustainable Tourism Policies**

Sustainable tourism policies in Dubrovnik are making strides through initiatives like the "Respect the City" project and the UNESCO World Heritage Site management plan for the Old Town. Improved alignment of regulations between state and local authorities could better reflect the destination's unique geographical and traffic-related characteristics, optimizing management practices for tourism and heritage conservation.

### Managing Visitor Flows

There is potential for further improvement in policies aimed at managing the spatial and temporal distribution of tourists visiting the Old Town. The

development of alternative tourism products, combined with the introduction of a destination management body, can facilitate effective management of visitor flows, ensuring a balanced experience that benefits all stakeholders.

# Clear Definitions in Urban Development Plans:

Ensuring that all initiatives with a spatial footprint are clearly defined in the Urban Development Plan—supported by cartographic representation—can provide clarity and direction for future developments. This approach allows for better planning and oversight, facilitating informed decision-making.

## **Bold Decisions for Sustainable Development**

Making bold, albeit potentially unpopular, decisions based on thorough analysis of current conditions, trends, and a clearly articulated vision for sustainable development will be crucial. Such decisions can pave the way for transformative changes that align with the long-term goals of Dubrovnik as a leading tourist destination.

### New Investments with a Clear Vision

Encouraging new investments in the broader area surrounding the destination is feasible if there is a publicly accepted development vision. This alignment of community interests with investment opportunities can lead to sustainable growth and enhanced quality of life for both residents and visitors.

# Securing Funding

# Increased Investment in Sustainable Tourism and Heritage Conservation

Securing funding for sustainable tourism and heritage conservation is vital for Dubrovnik's long-term viability and success. Various opportunities exist to enhance investments in these areas:

### Main Source of Funding:

One of the primary sources of funding is the partnership agreement between the Republic of Croatia and the European Commission, which facilitates the use of EU structural and investment funds aimed at fostering growth and job creation. This funding avenue is pivotal for financing initiatives that align with the Strategic Development Plan of the Dubrovnik-Neretva County.

# Applications for EU Projects

Dubrovnik can capitalize on the opportunity to apply for various EU projects that target sustainable development and cultural heritage preservation. These projects not only provide financial support but also enhance collaboration with other EU regions, facilitating knowledge exchange and best practices in sustainable tourism management.

### **Alternative Financial Instruments:**

In addition to traditional funding sources, Dubrovnik can explore alternative financial instruments such as **public-private partnerships (PPPs)**, donations, and subsidies. Collaborating with private entities can lead to innovative financing solutions, allowing for the development of infrastructure and sustainable tourism initiatives without solely relying on public funds.

### Capitalizing on Natural Assets:

Dubrovnik has the potential to link tourism with local agriculture, leveraging its natural assets to promote sustainable practices. This includes opportunities in citrus fruit production, vegetable cultivation, wine and olive growing, fisheries, mariculture, and eco-friendly hospitality. By integrating tourism with these

sectors, Dubrovnik can create synergies that attract funding for initiatives that support environmentally friendly production and local economic growth.

# EU Funds for Infrastructure Development

The construction of the highway from Ploče to Dubrovnik represents a significant opportunity for funding through EU funds, as outlined in the Dubrovnik-Neretva County development plan until 2027. This infrastructure project is crucial for enhancing connectivity, boosting tourism, and facilitating economic development in the region. Accessing these funds can significantly improve transportation logistics and overall visitor experience.

# **Enhancing Community Engagement and Support**

By fostering community engagement and promoting local ownership of tourism initiatives, Dubrovnik can also attract funding from local businesses and stakeholders invested in the city's sustainable future. Engaging the community in fundraising efforts and awareness campaigns can help secure additional resources for heritage conservation and tourism development.

# Technological Integration

# **Enhanced Visitor Management through Technology**

Dubrovnik can further leverage technology to monitor and manage sustainable tourism effectively. Current applications like **dubrovnik-visitors.hr** already track visitor numbers in the Old Town and predict future crowding. Expanding this functionality can help manage visitor flow and improve the overall tourist experience. By providing real-time data on crowd levels, alternative routes, and suggested visiting times, the city can mitigate congestion and enhance visitor satisfaction.

## Digitalization for Efficient Traffic Management

Digitalization can play a pivotal role in alleviating traffic congestion in the Old Town. By integrating smart solutions that monitor traffic patterns and provide recommendations for alternative routes, the city can improve transportation efficiency and reduce delays. This could include mobile applications that inform visitors about less crowded times to visit key attractions or suggest alternate routes to avoid traffic jams.

### Smart City Framework Implementation

The ICT Strategy of the Dubrovnik-Neretva County outlines a framework for smart city development, which can be further implemented in Dubrovnik. By investing in information and communication technology, the city can improve its tourism services and operational efficiency. This includes integrating digital solutions for urban management, which can enhance service delivery, improve resource allocation, and optimize city operations.

### **Digital Transformation Initiatives**

Projects like DUSC Ragusa Digital and DUSC Duke's Palace Digital demonstrate Dubrovnik's commitment to digital transformation. Expanding these initiatives can enhance the quality of tourism services and promote transparency in public administration. Implementing a comprehensive document management system and creating a digital database can streamline processes and improve the accessibility of information for both residents and visitors.

## Integration of Renewable Energy and Sustainable Practices

By incorporating **renewable energy** and resilient infrastructure into urban life, Dubrovnik can position itself as a leader in sustainable tourism. Digital solutions can support these initiatives by optimizing energy consumption and promoting environmentally conscious practices. Investing in green technologies through intersectoral cooperation can foster innovation and improve sustainability in tourism and heritage conservation.

## Additional Visitor Services through Technology

Introducing additional services such as locating available parking spaces and recommending alternative attractions can significantly enhance the visitor experience. By utilizing technology to provide real-time updates on parking availability and less crowded attractions, the city can help distribute tourist activity more evenly and alleviate pressure on popular sites.

### Development of a New Passenger Terminal at the Airport

The planned development of a new passenger terminal at the airport presents an opportunity to integrate smart technologies. This can enhance passenger flow, improve operational efficiency, and provide an enhanced experience for travellers. Incorporating digital services at the airport, such as check-in kiosks, wayfinding applications, and real-time flight updates, can streamline the travel experience.

### **Adoption of Smart City Tools**

Utilizing various **smart city tools** can provide innovative solutions for tourism management and urban planning. These tools can include data analytics platforms to monitor visitor patterns, mobile applications for tourists, and IoT (Internet of Things) devices to improve city services. Implementing these technologies can lead to more informed decision-making and better resource management.

# Climate Resilience

### Implementation of Nature-Based Solutions (NbS)

Dubrovnik can leverage nature-based solutions to enhance climate resilience and protect its natural and cultural heritage. By restoring and preserving natural ecosystems, such as coastal wetlands and forests, the city can improve its ability to manage stormwater, reduce flood risks, and enhance biodiversity. These solutions not only provide environmental benefits but also create recreational spaces for residents and tourists.

## **Development of Comprehensive Climate Change Strategies**

The adoption of robust strategies for climate change mitigation and adaptation presents an opportunity for Dubrovnik to address current and future climate challenges. This includes the implementation of the **Climate Change Adaptation Plan for the City of Dubrovnik**, which outlines specific measures to enhance resilience against adverse weather conditions. By integrating these strategies into urban planning and development processes, the city can better prepare for the impacts of climate change.

### Civil Protection Measures for Extreme Weather Events

The establishment of effective civil protection measures is crucial for enhancing the city's resilience to extreme weather events such as heavy precipitation, landslides, and floods. By continuously improving and implementing strategies that protect transport, communal, and civil infrastructure, Dubrovnik can minimize damage during adverse weather

conditions. Investing in infrastructure upgrades, early warning systems, and community training can further enhance preparedness.

# Intercounty and Interstate Cooperation

The intensification of global trends toward sustainable tourism opens opportunities for **intercounty and interstate cooperation** to tackle shared environmental challenges. Collaborating with neighbouring regions and countries can foster the exchange of best practices, resources, and technologies. This cooperation can also strengthen collective efforts to address climate change impacts and promote sustainable tourism initiatives across borders.

# Partnerships with International Environmental Organizations

Engaging with international environmental organizations that focus on technology for waste removal and marine conservation presents a unique opportunity for Dubrovnik. Collaborating on initiatives to reduce plastic and other marine waste can enhance the city's commitment to environmental sustainability while protecting its pristine coastal areas. This partnership can also promote awareness and education about sustainable practices among both residents and tourists.

## **Compliance with Air Protection Regulations**

The **Air Protection Act** outlines specific responsibilities and measures to mitigate climate change. By ensuring compliance with these regulations, Dubrovnik can improve air quality and reduce greenhouse gas emissions. This presents an opportunity to develop local initiatives that support sustainable transportation, promote energy efficiency, and encourage the use of renewable energy sources.

### Promotion of Renewable Energy Sources

Investing in renewable energy sources, such as solar and wind power, can significantly enhance the city's climate resilience. By transitioning to renewable energy, Dubrovnik can reduce its dependence on fossil fuels, lower its carbon footprint, and promote sustainability in tourism and other sectors. The development of local renewable energy projects can also create job opportunities and stimulate the economy.

## Enhancing Public Awareness and Community Engagement

Building climate resilience requires active participation from local communities. Increasing public awareness about climate change impacts and sustainable practices can empower residents to contribute to resilience efforts. Educational campaigns, workshops, and community initiatives can foster a culture of sustainability and encourage individuals to adopt ecofriendly behaviours.

### Investment in Climate-Resilient Infrastructure

Upgrading existing infrastructure and investing in new, climate-resilient designs will enhance the city's ability to withstand climate impacts. This includes reinforcing coastal defences, improving drainage systems, and utilizing sustainable building materials. Ensuring that all new infrastructure projects comply with climate resilience standards will safeguard the city against future climate-related risks.

## Threats

#### Climate Change

The threats posed by climate change to Dubrovnik's tourism and heritage sites are significant and multifaceted, presenting serious challenges for adaptation and resilience. As one of the three European countries most affected by extreme weather events relative to its gross national product, Croatia faces a host of climate-related hazards that jeopardize its cultural and natural assets.

One of the most pressing threats is the increased frequency of extreme weather events. Dubrovnik is experiencing a rise in the occurrence of storms, floods, and heatwaves, which are exacerbated by climate change. This year's summer saw temperatures soar above 35 degrees Celsius, with sea temperatures reaching an alarming 29 degrees. Such conditions not only affect visitor comfort and safety but also strain local infrastructure, particularly transport and energy systems. The rise in temperatures leads to a higher demand for air conditioning, placing additional pressure on the electrical grid, which is already under stress. The illegal installation of many air conditioning units contributes to the heat generated in urban spaces, turning Dubrovnik's historic center into a significant urban heat island.

**Urban flooding** is another major concern, worsened by inadequate stormwater drainage and the excessive construction that has reduced green spaces. The combination of heat islands and poor drainage systems can lead to flash floods, which pose a direct threat to both residents and tourists. Moreover, **rising sea levels threaten the integrity of Dubrovnik's Old Town,** a UNESCO World Heritage Site that is essential to the city's identity and economic stability.

The impact of climate change extends beyond immediate weather events; it also affects water supply and sewerage systems, which are crucial for maintaining public health and sanitation in a bustling tourist destination. Inadequate preparedness for natural disasters further exacerbates these risks, highlighting the need for improved emergency response strategies. Insufficient international cooperation with neighbouring countries regarding environmental threats and disease spread complicates the situation, particularly in the face of climate-induced health risks.

Finally, the changing climate can lead to the spread of diseases, which poses an additional **public health challenge**. The increasing temperature and humidity create a conducive environment for certain pathogens, potentially leading to outbreaks that could affect both locals and visitors.

# Seasonal Tourism

Dubrovnik faces significant threats stemming from its reliance on seasonal tourism, which creates a range of challenges that affect both the local population and the sustainability of its tourism sector. One of the most pressing issues is the **shift in the main tourist season due to extreme heat**. As summer temperatures rise, the traditional peak season may extend into earlier and later months, leading to an uneven distribution of tourist arrivals throughout the year. This fluctuation complicates planning and resource allocation for local businesses and public services.

Despite the potential for a longer tourist season, the reality remains that Dubrovnik struggles to achieve year-round tourism. Adverse winter weather conditions, including heavy storms, can lead to airport closures, severely limiting accessibility and deterring potential visitors. This seasonality creates a significant reliance on peak months for revenue generation, leaving businesses vulnerable during off-peak times and contributing to economic instability.

The intense influx of tourists during the peak season places immense strain on the city's resources and infrastructure. The city's carrying capacity is often exceeded, leading to overcrowding in popular areas, particularly the historic Old Town. During the summer months, nearly 50% of all overnight stays and arrivals occur, resulting in a feeling of saturation that detracts from the visitor experience. Furthermore, the overwhelming number of excursionists and cruise passengers adds to the challenges of managing seasonal tourism fluctuations.

This overdependence on peak seasons not only affects tourists but also exhausts the local population. Many residents find it difficult to navigate their own city during the tourist season, leading to avoidance of the Old Town and other popular areas. This disconnection can foster resentment among locals, who feel that their quality of life is compromised by the sheer volume of visitors.

Moreover, seasonal tourism poses significant **labor force challenges**, making it difficult for residents to secure year-round employment. Many job opportunities in the tourism sector are temporary, resulting in economic uncertainty for local families. This seasonal employment dynamic can contribute to a housing crisis, as workers struggle to find stable housing during the off-peak months.

Finally, the **rise of low-cost flights** has further complicated the situation, driving up carbon emissions and impacting the environmental sustainability of Dubrovnik's tourism model. As more visitors arrive via budget airlines, the carbon footprint associated with seasonal tourism increases, raising concerns about the ecological impact on the region.

Global Trends and Policies

Dubrovnik faces several significant threats driven by global trends and policies, particularly those related to climate change and the pressures of mass tourism. As part of the Mediterranean basin, which has been identified as a climate "hot spot," Croatia is acutely sensitive to the impacts of climate change. The Climate Change Adaptation Plan for the City of Dubrovnik underscores that the region's vulnerability is assessed as high, with expectations that the impacts of climate change will intensify in the coming years. Changes in rainfall patterns and rising air temperatures lead to increased sea levels, which can threaten coastal areas, infrastructure, and the overall environmental health of the city.

Another pressing threat is the phenomenon of overtourism, characterized by mass tourism that overwhelms local infrastructure and resources. The influx of visitors generates crowding and noise, placing significant pressure on physical planning and communal services. This surge affects not only the preservation of Dubrovnik's natural and cultural heritage but also diminishes the quality of life for local residents. The Integrated Action Plan for Dubrovnik as a

Sustainable Tourism Destination highlights the challenges in maintaining a balance between tourism growth and the need to protect the environment and economic diversity. Overcrowding can lead to resource depletion, increased waste, and degradation of public spaces, making it crucial for the city to address these concerns.

Additionally, there is a growing sense of unrest among local populations in response to the negative impacts of mass tourism. Communities in leading tourist cities like Barcelona, the Balearic Islands, and Venice have experienced significant pushback from residents who feel overwhelmed by tourism-related pressures. Dubrovnik is not immune to this trend, and the potential for similar rebellions looms as residents express their frustrations over issues such as overcrowding, rising living costs, and a perceived decline in their quality of life. Such movements can lead to increased tensions between local communities and tourism stakeholders, ultimately impacting the sustainability of the tourism sector.

# Stakeholder Engagement Issues

Dubrovnik faces several threats stemming from stakeholder engagement issues, which complicate the effective collaboration between key players, including government authorities, the private sector, and local communities. These challenges are critical in addressing pressing urban and tourism-related concerns.

During peak tourist seasons, the traffic system in Dubrovnik becomes severely overloaded, leading to significant congestion. The city's unique geographical configuration limits the possibility of expanding road infrastructure, which frustrates local residents who navigate these challenges daily. The increase in taxi vehicles, alongside a high number of personal vehicles and motorcycles, exacerbates the issue. This situation creates potential conflicts between the local community and authorities, as citizens demand solutions to improve traffic flow and accessibility while tourism interests push for increased visitor capacity. The Integrated Action Plan for Dubrovnik as a Sustainable Tourism Destination highlights these concerns, suggesting that without effective stakeholder engagement, sustainable transportation solutions may remain unaddressed.

Another significant threat arises from insufficient investments in the preservation of Dubrovnik's natural and cultural heritage. There exists a potential conflict among various stakeholders, including conservationists, local residents, and tourism operators, as they navigate the complexities of heritage management. The Action Plan Program Poštujmo Grad! emphasizes the need for a collaborative approach to heritage conservation, yet differing priorities among stakeholders can hinder progress. This discord can result in neglecting critical preservation efforts and lead to degradation of the very resources that attract tourists, ultimately jeopardizing the city's long-term sustainability.

The pressures of overtourism have compounded challenges related to spatial development in Dubrovnik. Environmental and heritage protection efforts are burdened by the high volume of visitors and low investment intensity in conservation initiatives. This situation limits the city's ability to implement effective spatial planning strategies that could mitigate the impacts of tourism on local communities and the environment. Without a unified stakeholder

engagement strategy, conflicting interests may lead to further deterioration of public spaces and cultural sites, posing a threat to the city's appeal as a tourist destination.

The rapid shift towards rental-focused tourism models often undermines educational efforts aimed at promoting sustainable practices among visitors and local businesses. This focus can lead to a neglect of broader community well-being, as short-term rental operators may prioritize profit over the needs of the local population. Such dynamics can create divisions within the community and contribute to a sense of alienation among residents, who may feel that their concerns are overlooked in Favor of tourism revenue.

Lastly, a significant threat arises from the lack of interest or engagement among certain stakeholders who directly benefit from mass tourism. This disengagement can hinder collaborative efforts necessary for sustainable tourism management. When key players—such as large hotel chains or tour operators—are not fully invested in community concerns or sustainable practices, it can lead to decisions that prioritize short-term financial gain over long-term sustainability, further exacerbating existing issues.

Demographic and workforce

Dubrovnik faces significant threats related to demographic trends that pose challenges to its tourism industry and overall economic stability. These demographic shifts have serious implications for the city's ability to maintain a vibrant, sustainable community while delivering high-quality tourism services.

One of the most pressing threats is the **negative demographic trend characterized by a declining population**. Many young residents are leaving Dubrovnik in search of better economic opportunities in larger cities or abroad. This exodus not only diminishes the local workforce but also impacts the community's cultural vitality. As the population shrinks, there is a risk of decreased local engagement in tourism-related activities, which can lead to a less authentic experience for visitors and a diminished sense of community for those who remain.

The high unemployment rates among young, highly educated individuals present another formidable challenge. Despite their qualifications, many young people struggle to find employment opportunities in Dubrovnik, particularly within the tourism sector. This mismatch between skills and available jobs can lead to disillusionment and further emigration. The Development Plan until 2030 highlights the urgency of addressing this issue, as a lack of job prospects for educated youth can stifle innovation and entrepreneurship in the tourism industry, reducing the city's competitiveness.

As a direct consequence of population decline and youth unemployment, Dubrovnik is **unable to secure a sufficient workforce to systematically develop its tourism industry.** The demand for high-quality services in tourism requires a skilled and motivated workforce; however, the current demographic trends make it increasingly challenging to meet these demands. The inability to attract and retain talent can lead to a decline in service quality, negatively impacting the visitor experience and potentially damaging the city's reputation as a premier tourist destination.

The combination of a shrinking population and high youth unemployment threatens the overall economic vitality of Dubrovnik. As the workforce diminishes, local businesses, especially those in the tourism and hospitality sectors, may struggle to operate efficiently, leading to reduced economic output and increased reliance on external labour sources. This reliance can create instability within the local economy, further exacerbating the challenges posed by demographic shifts.

# Rome

# Strengths

# Existing Legal Frameworks

# National Legislation for Cultural Heritage: Codice dei Beni Culturali e del Paesaggio (Cultural Heritage and Landscape Code)

- Comprehensive Coverage: Recognizes and protects a broad range of cultural assets, from tangible (art, architecture, archives) to intangible heritage (arts, traditions).
- **Clear Administrative Framework**: Outlines responsibilities between state and regional authorities, ensuring structured heritage management.
- **Legal Protections**: Establishes both administrative and criminal penalties, providing strong legal backing for heritage conservation efforts.

## National Legislation on Tourism (Tourism Code)

- **Focus on Tourist Protection**: Emphasizes the rights of tourists and incorporates EU standards, ensuring high service standards.
- Adaptation to Digital Trends: Recognizes changes due to the digital revolution, addressing modern challenges such as disintermediation and online platforms.
- **Diverse Tourism Products**: Defines a wide array of tourism-related businesses, focusing on excellence in tourism services.
- **Consumer Rights and Service Quality**: Provides mechanisms for quality assurance, dispute resolution, and standards for damage compensation.

### Regional Tourism Legislation (Lazio Region)

- Modernized Structure: Establishment of the General Directorate for Tourism streamlines operations, aligning tourism with other productive sectors.
- Focus on Sustainability and Technology: Encourages sustainable practices and the use of new technologies to enhance service quality.

- Clear Standards for Non-Hotel Accommodations: Defines minimum requirements and transparency measures for non-hotel accommodations, supporting regulatory compliance.
- Transparency and Accountability: Mandates regional identification codes and price transparency, enhancing trust and clarity for consumers and providers alike.

### **Promoting Legality in the Fight Against Illicit Practices**

- Enforcement of Legal Framework: Use of identification codes (CIR and CIN) for non-hotel accommodations helps prevent illicit rentals and fosters transparency.
- Profession Regulation: Clear requirements and certification for tourism professionals (tour guides, interpreters) ensure high service standards and quality experiences for tourists.
- Counterfeit Reduction Efforts: Emphasis on combating counterfeiting in tourism-sensitive industries, particularly in the fashion sector, aligns with Rome's reputation as a high-quality shopping destination.

# Regional Law No. 17/2011

**Guest Registration Compliance**: Daily data submission through the RADAR system offers real-time insights on tourist flows, enabling better planning and policy-making.

## The City of Rome Strategic Plan

- **Emphasis on Sustainable Tourism**: Integration of tourism into Rome's sustainability goals, promoting longer stays to reduce overtourism and encourage the exploration of lesser-known areas.
- Enhanced Governance of Tourist Flows: Policies to distribute tourism across the metropolitan area reduce pressure on central areas and enhance the appeal of outer regions.
- **Diverse Tourism Offerings**: Development of mixed tourism types (e.g., coastal and interior, cultural and natural) increases appeal for a wide variety of tourists, supporting a balanced visitor distribution.
- Focus on Accessibility and Inclusivity: Improved public mobility, connections, and accessible hubs enhance tourism for diverse groups, including those with disabilities.
- Promotion of Intangible Cultural Heritage: Encouraging authentic experiences and educational tours creates deeper connections with Rome's heritage and promotes conscious tourism.

#### **The Events**

- Increased Tourism in Low Season: By hosting events year-round, Rome can attract visitors even during traditionally slower periods, creating a more consistent tourism flow.
- Sustainability in Event Planning: By decentralizing events outside the historic center, Rome reduces congestion in key areas, spreading the economic and social benefits more widely across the city.
- Economic Impact of Event Tourism: Data highlights high expenditure by tourists attending events (e.g., €93 per day), which boosts local economies compared to regular tourist spending.
- Variety and Prestige of Events: Rome's calendar includes diverse events from sports (Rome Marathon, European Athletics Championships) to cultural and fashion events (Rome Film Festival, Fashion Week), appealing to a wide audience.
- Infrastructure and Facility Development: Hosting major events justifies investment in infrastructure, benefiting both tourists and residents long-term. Facilities like the Roma Convention Centre and the Auditorium Parco della Musica enhance Rome's event-hosting capabilities.
- Strategic Promotion: Through the Department of Major Events, Sport, Tourism, and Fashion, Rome actively promotes major events, linking them with tourism and local industries like fashion, which fosters economic growth and international visibility.

# The 2025 Jubilee

- Sustainable Construction and Maintenance: Use of "green asphalt" for road resurfacing made from recycled plastics exemplifies Rome's commitment to sustainable infrastructure that minimizes emissions and reduces natural resource consumption.
- **Nighttime Work Schedule**: Carrying out construction at night reduces traffic and daytime emissions, demonstrating a careful approach to urban development that minimizes disruption.
- **Climate-Resilient Design**: Key Jubilee sites are designed to manage extreme weather risks, enhancing visitor safety and comfort.
- Preservation and Enhancement of Historical Sites: Redevelopment
  projects at San Giovanni Laterano and other pilgrimage sites respect the
  historical and cultural significance of these areas, ensuring they remain
  attractive for future generations.
- Promotion of Sustainable Pilgrimage Tourism: The city's focus on sustainable practices for the Jubilee reinforces Rome's reputation as a

	forward-thinking destination, well-prepared to manage high visitor volumes responsibly.
Established	National Environmental Policy
Policy Frameworks	Multi-Level Governance for Sustainability: The policy aligns with EU standards and promotes collaboration among national, regional, and local authorities, creating a comprehensive sustainability framework.
	Agenda XXI for Sustainable Tourism: Emphasizes sustainable tourism through education, local stakeholder engagement, and responsible behavior, fostering community-driven environmental initiatives.
	Ecolabel Certification for Tourism: Incentivizes eco-friendly practices among tourism operators, which enhance environmental protection, promote sustainable consumption, and encourage resource conservation.
	Green Public Procurement (GPP): Rome's ambitious GPP target (100% compliance by 2025) demonstrates leadership in sustainable procurement, driving public sector investment in environmentally responsible products and services.
	Environmental Accounting and Monitoring: The implementation of environmental accounting systems, like ecosystem services accounting, aids in assessing the ecological impact of tourism and other sectors, ensuring accountability and informed decision-making.
	Climate Adaptation Plan
	Comprehensive Climate Resilience Initiatives: With measures for flood protection, heat mitigation, and water security, the plan strengthens Rome's preparedness for extreme weather events.
	<ul> <li>Integrated Approach to Prevention and Research: The inclusion of prevention, alert systems, civil protection, and ongoing research supports proactive, evidence-based climate actions.</li> </ul>
	Ensuring Urban Mobility with Lower CO2 Emissions
	ZTLs and Incentivized Public Transport: Limited Traffic Zones reduce congestion and pollution, and incentivize eco-friendly transport options, promoting sustainable tourism mobility.
	Expansion of Pedestrianized Areas: Partial pedestrianization allows visitors to explore key areas on foot, lowering emissions and enhancing urban livability.
	Investment in Rail and Metro Infrastructure: Enhanced rail connections

and the new Metro Line C provide sustainable transit alternatives, reducing

car dependence and cutting CO2 emissions. The introduction of the Nightjet night train offers a lower-emission alternative for international travelers, supporting sustainable tourism while connecting Rome to major European cities.

- **Electric Mobility Initiatives**: Promotion of electric vehicle use through charging stations and ZTL access supports sustainable transit and encourages low-emission travel within the city.
- Sustainable Airport Initiatives: Sustainable practices at Rome's airports, such as waste recovery, plastic reduction, and renewable energy use, exemplify commitment to reducing tourism-related environmental impacts.

Effective community engagement policies:

### **Regional Information and Communication: Information Portals**

Regional Tourism Portal: Visit Lazio, provides information about Lazio's
regional areas. Aiming to draw attention to lesser-known areas and reduce
crowding in the historical center; connects the exploration of Lazio's less
familiar areas with Rome.

The Lazio region's park portal gives information about tourist opportunities related to nature. Tourist can explore lesser-visited and nature-focused destinations, promoting sustainable tourism.

- Portal for European Calls for Proposals: Lazio Europa serves residents, businesses, and organizations, offering information on funding, grants, and other EU initiatives, including those supporting regional tourism development.
- **Portal for Agriculture and Agritourism**: Arsial, the Agency for Development and Innovation of Agriculture in Lazio, provides updated information, regulations, and forms for agritourism, social agriculture, and direct sales.

# Strategic Action Plans

### **Strategic Action Plans**

- a. Existing Tourism Sustainability Strategies with Proven Success
  - Reorganization of the Lazio Territory into ATD: each ATD featuring a unique
    identity and set of attractions. This initiative aims to strengthen tourism by
    creating local hubs, enhancing quality and accessibility, and promoting
    sustainable practices. The ATDs encourage regional synergies and address
    seasonal tourism patterns through differentiated offerings, allowing visitors
    to customize experiences based on cultural, natural, religious, or sportsrelated interests.
  - Rome-Specific Measures for High-traffic Locations: Measures to manage high visitor numbers in Rome include:

- Reservations: Online booking is mandatory for popular sites like the Borghese Gallery and Colosseum Park.
- Outdoor Venue Restrictions: For iconic sites like the Trevi Fountain,
   Rome is experimenting with entrance quotas during peak times to control crowds. Potential entry fee of €2 is under consideration.
- Integrated Cards: Rome offers various tourist passes, like the Roma Pass (48h/72h versions) and the MIC card for residents, combining entry to top attractions with public transport access. These cards distribute visitor flow to lesser-visited sites, support heritage preservation, and improve the tourist experience.
- Water for Tourists: Rome's network of public drinking fountains provides free water, helping reduce plastic use.
- b. Detailed Cultural Heritage Protection and Disaster Risk Reduction Strategies
  - Carabinieri Command for Cultural Heritage Protection: safeguard Italy's cultural heritage from illegal trade and damage.
  - Cameras and Video Control Center: round-the-clock monitoring at Palazzo Braschi, covering 90 sites with video surveillance and alarms, drastically reducing vandalism and theft in these areas.
  - Urban Police Regulations: Rome's Urban Police Regulation outlines new rules on public order and quality of life, affecting tourists. These include prohibitions on queue-jumping, unauthorized street sales, public alcohol consumption, bathing in fountains, and unregulated commercial photography with actors dressed as Roman centurions or gladiators. Violation of these regulations can lead to fines and temporary site bans.

# Stakeholder Engagement

- The Tourism Development Plan for the City of Rome emphasizes innovation, sustainability, and inclusion, focusing on partnerships between public and private stakeholders to advance the tourism sector. Key governance tools in the Strategic Plan for the Metropolitan City of Rome (2022-2024) involve collaborative initiatives, including round tables with municipalities to guide tourism policies, a regional working table on protected areas, and public-private partnerships to promote diverse tourism options.
- To support sustainable tourism, the city has established the Integrated
  Tourist Offer Network (ROTI), which encourages experiential tourism in
  less-visited areas and includes strategic measures such as market
  monitoring and adaptation of tourism services.
- Collaboration extends to the private sector; entities like Coopculture
  manage cultural sites and provide visitor services. Zètema Progetto Cultura
  Srl, a subsidiary of Roma Capitale, coordinates city heritage projects,

museum systems, and tourist information services. For business tourism, the **Convention Bureau of Rome and Lazio** promotes the city and region as venues for conferences, blending business and leisure opportunities.

- Rome's plan also preserves historic shops with the Lazio Region's regional law, recognizing establishments of historical, artistic, or cultural value.
- Several participatory tools also encourage stakeholder engagement, including the Local Agenda XXI Forum for discussing socio-environmental issues and the Tiber Agenda to enhance Rome's river area. Tiberland and TiberTour offer integrated tourism experiences along the Tiber River, emphasizing sustainable engagement with the landscape, heritage, and local products.
- Service cards in Rome's tourism sector define public service standards. At
  the national level, the Ministry of Tourism's Service Card ensures equality,
  transparency, and citizen participation. Lazio's Tourist Card includes
  tourists' rights and responsibilities, and Rome's Tourist Information Services
  Charter covers services provided by Zètema, outlining quality standards and
  complaint processes.
- Rome also addresses climate change adaptation through its participatory strategy, inviting public feedback, holding workshops, and organizing roundtables with diverse stakeholders. The 2019 Participatory Budget initiative allocated €20 million for community-selected projects, including pedestrian and bicycle paths.
- Rome and Lazio host sustainability-focused events, including the European Innovation for Sustainability Summit and public festivals to raise awareness about sustainable development practices and encourage community involvement in sustainability goals.

# Weaknesses

# Regulatory Inconsistencies:

- Regulatory Discrepancies: Inconsistent responses among supranational, national, and local levels lead to discrepancies in regulations and slow adaptation of local laws, resulting in uneven regulatory implementation across territories.
- Resource Imbalances: Variability in material and immaterial resources among different territories hampers development and project execution, leaving some areas underserved.
- Diverse Municipality Challenges: Significant differences in resource allocation, stakeholder influence, and social innovation capabilities between the central and peripheral areas of Rome complicate effective governance and project planning.

Political Fragmentation: Varying political orientations among different levels of government can create misaligned investment priorities and hinder coherent policy development. Diverse Territorial Characteristics: The wide range of landscape and environmental characteristics within territories complicates governance and may lead to uneven oversight and management of resources. Legal and Bureaucratic Hurdles: Complex legal frameworks and bureaucratic procedures further complicate the implementation of policies and initiatives, hindering timely action. Differences in the enforcement of regulations related to tourist behaviors (e.g., parking, alcohol consumption) can lead to inconsistencies in law enforcement and public dissatisfaction. **Funding High Costs of Sustainable Practices**: The financial burden of developing Limitations sustainable tourism practices, including certifications and facility upgrades (e.g., renewable energy investments), poses a significant challenge. Many private entities question the feasibility and return on these investments. Short-Term Financial Hesitance: Although the long-term benefits of sustainable practices are evident, many private entities are reluctant to commit financially in the short term due to immediate cost concerns. **Tax Revenue Discrepancies:** The gap between actual and potential tax revenue limits available funds for investment. Ineffective tax collection, primarily due to tax evasion, undermines revenue generation efforts. Dependence on Foreign Chains and Loss of Domestic Profits: A substantial portion of revenue in the hotel sector is generated by foreignaffiliated establishments, leading to significant outflows in the form of affiliation fees and commissions to foreign online travel agencies, further diminishing national tax revenue. Tax Compliance Issues: Ongoing disputes with platforms like Airbnb over unpaid taxes complicate the tax landscape and hinder revenue recovery efforts. Infrastructure Inadequate Information and Signage: Many tourists struggle with Deficiencies: accessing and understanding cultural heritage due to a lack of adequate informational materials and signage. Outdated Tourist Signage: The current tourist signage is outdated and not user-friendly. There is a need for modernization and digitization, including QR codes and interactive elements, to enhance accessibility and engagement. Inefficient Waste Management: Long-standing waste management issues tarnish the city's image, contributing to unhygienic conditions and affecting

livability for both residents and tourists. The visible presence of waste impacts the overall tourist experience.

- **Limited Public Transportation**: The urban public transport network suffers from inefficiencies, including infrequent service in various areas, which complicates mobility for tourists and residents.
- Taxi Availability Issues: The imbalance between taxi demand and supply leads to long wait times at key locations, creating frustration for tourists and affecting their overall experience in the city.
- Insufficient Cultural Heritage Protection: The risks to cultural heritage from pollution, degradation, and mass tourism are significant. Reports of vandalism and theft highlight the vulnerabilities in safeguarding these assets.
- Challenges in Real-Time Surveillance: Despite investments in monitoring systems for cultural assets, the extensive territory of Rome makes effective real-time surveillance difficult.
- Lack of Sustainable Design in New Infrastructure: While there is a growing emphasis on sustainable design principles in educational institutions, the actual implementation in infrastructure projects has been slow. This gap indicates a need for a stronger commitment to sustainability in new developments.

# Data and Monitoring:

- Inconsistent Data Publication: Although there is a legal framework for
  collecting tourism data, the publication of this information is not systematic
  or timely. For instance, the regional statistics portal has only one report from
  2016, limiting the availability of current data on tourist movements and
  accommodation facilities.
- Limited Data on Short-Term Rentals: There is a significant gap in data concerning short-term rentals, particularly due to illegal operations and tax evasion. This lack of information hampers effective monitoring and regulation of this growing sector, creating potential gaps in understanding supply and demand.
- **Chronic Data Gaps**: A "chronic" lack of data on tourism especially in municipalities outside the city. This absence of information can hinder effective policy-making and resource allocation.
- **Resource Constraints for Monitoring**: Effective enforcement of environmental regulations requires substantial resources and personnel.
- Insufficient Enforcement Processes: The Metropolitan City of Rome has implemented a technical and administrative control system, but the effectiveness of these measures may be compromised by the lack of personnel and resources dedicated to environmental monitoring and enforcement.

Harmonizing	Alignment with Sustainable Development Goals: Rome's Tourism Plan is
Regulations	aligned with the UN Agenda 2030 for Sustainable Development, providing a framework that encourages responsible growth, decent work, and economic growth. This alignment opens avenues for securing funding and support from international and national entities.
	<ul> <li>Integration with National Tourism Framework: The city's tourism plan integrates with the Strategic Tourism Plan of MIBACT, which emphasizes innovation, digitalization, and infrastructure improvements. This alignment provides opportunities for Rome to enhance its competitiveness and tourist offerings through national-level initiatives.</li> </ul>
	<ul> <li>Collaboration through International Programs: Participation in European programs like the STAR Cities Project and Interreg projects facilitates the exchange of best practices and innovation in tourism management.</li> <li>Collaborating with other cities can lead to improved strategies for river tourism and sustainable practices.</li> </ul>
	Focus on Climate Neutrality and Smart City Initiatives: Being part of the Climate Neutral & Smart Cities program positions Rome to lead in sustainable urban development. Initiatives such as improving public transport, promoting sustainable mobility, and enhancing recycling efforts align with global trends towards eco-friendly cities.
	<ul> <li>Integrated Strategies for Heritage Conservation: The challenge of balancing tourism growth with the conservation of cultural heritage presents an opportunity to develop integrated strategies. The Strategic Plan promotes slow tourism and alternative micro-destinations, allowing for the sustainable promotion of lesser-known areas and alleviating pressure on Rome's historic center.</li> </ul>
	<ul> <li>Promotion of River and Coastal Tourism: Initiatives like the Tibertour project highlight the potential for enhancing river tourism. Developing packages that include cultural heritage and natural landscapes can attract visitors to less frequented areas, thus fostering sustainable tourism.</li> </ul>
Securing Funding	Funding from European Programs: The Strategic Plan aligns with the objectives of the EU's cohesion policy, enabling access to funds such as the ERDF and ESF+. These funds can support urban regeneration projects, particularly in underdeveloped areas like Ostia, promoting sustainable tourism and development.
Technological Integration	Enhanced Digitalization: The emphasis on digitalization within the EU cohesion policy presents opportunities to improve competitiveness for SMEs (small and medium-sized enterprises) and enhance the tourist

	experience through innovative technological solutions in information sharing and service delivery.
Climate Resilience	

### **Threats**

Threats	
Climate Change	Increased Environmental Vulnerabilities: Climate change intensifies threats to Rome's cultural heritage sites through more frequent extreme weather events, pollution, and temperature fluctuations, accelerating degradation.
	Impact on Tourist Experience: Climate-related factors, such as extreme heat waves, could deter tourists, affecting seasonal tourism patterns and overall visitor numbers.
	Challenges in Infrastructure Resilience: Adapting infrastructure to withstand climate impacts, especially sustainable practices like green building and energy-efficient upgrades, could be costly and logistically complex.
Seasonal Tourism	Overcrowding in Peak Seasons: Seasonal peaks lead to overcrowded areas, straining infrastructure, public transportation, and waste management systems, and diminishing the quality of both tourist and resident experiences.
	<ul> <li>Resource Strain and Imbalanced Distribution: During peak times, services are overstretched, while off-peak periods see underutilized resources, leading to inefficiencies in resource allocation and investment.</li> <li>Revenue Fluctuations: Seasonal tourism leads to unpredictable revenue</li> </ul>
	streams, complicating financial planning and potentially resulting in short- term investment hesitance from private entities.
Global Trends and Policies	Discrepancies in Sustainable Tourism Practices: Compliance with global sustainability standards is costly, and many businesses may struggle with the initial investment, affecting local competitiveness on a global scale.
	Pressure from International Tax and Regulatory Standards: International agreements and policies, especially those targeting online platforms and short-term rental regulations, may influence local laws and create compliance pressures.
	Dependence on International Chains: Heavy reliance on foreign-affiliated hospitality establishments leads to revenue leakage through foreign travel agency fees, affecting local tax revenue generation.

### Stakeholder Engagement Issues

- Coordination and Political Fragmentation: Diverse political orientations and objectives across local, national, and supranational levels lead to fragmented governance and inconsistencies in project priorities, complicating coherent policy implementation.
- **Disparate Influence and Resource Allocation**: Varied levels of stakeholder influence, particularly between central and peripheral areas, create imbalances in development and resource distribution, often leaving peripheral areas underserved.
- Community Involvement Challenges: Insufficient engagement with local communities and stakeholders in planning and resource management can lead to public dissatisfaction, reducing support for local initiatives and governance efforts.
- **Limited Data Accessibility:** Chronic gaps in tourism data and limited information on short-term rentals hinder effective stakeholder engagement and evidence-based decision-making.

#### Limassol

### Strengths

# Existing Legal Frameworks

Cyprus adapted a number of legal frameworks designed to manage effectively tourism, to protect environment and preserve cultural heritage.

#### 1. Tourism Legislation:

- Tourism Development Law (2018): The first law and regulations related to tourism were introduced, including the Tourism Development Law (1969). This law
- Regulation of Tourism Operation: The regulation is directed to travel agencies and operators to ensure the adaption of best practices regarding safety and service quality

#### 2. Environmental Protection Framework:

• The Directive was aligned with the national law in 2005 by the Environmental Impact Assessment from Certain Plans and/or Programmes Law: The law covers plans or programmes drawn up for the various sectors of the economy, such as energy, industry, transport, waste management, water management, telecommunications, tourism, urban planning and land use, which specify the framework for future permits of projects covered by the law on environmental impact assessment of projects. The aim of the Directive on the

Assessment of the Effects of Certain Plans and Programmes on the Environment is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment. The Directive was aligned with the national law in 2005 by the Environmental Impact Assessment from Certain Plans and/or Programmes Law 102(I)/2005 (https://www.cylaw.org/nomoi/arith/2005\_1\_102.pdf) **Environmental Impact Assessment Procedure Law (1996):** The government introduced the Sustainable Tourism Policy (1998), which emphasized responsible tourism practices and minimization of negative impacts on the environment (https://www.cylaw.org/nomoi/arith/2005\_1\_102.pdf) 3. Cultural Heritage Protection: Antiquities Law (1960) - This law protects archaeological sites, monuments, and artifacts in Cyprus. Cultural Heritage Law (2000): This law regulates the protection and conservation of cultural heritage in Cyprus. **Architectural Heritage Preservation Department Law (2017):** This law establishes the Architectural Heritage Preservation Department, which is responsible for protecting and conserving architectural heritage in Cyprus. National Inventory of Cultural Heritage (2019): This inventory lists cultural heritage sites and monuments in Cyprus, providing a framework for their protection and conservation. UNESCO Conventions: Cyprus is a sigantory to several conventios, including the UNESCO World Heritage Convention, formally the Convention Concerning the Protection of the World Cultural & Natural Heritage. Cyprus has implemented policy frameworks to promote sustainable tourism development focusing environmentally friendly practices, cultural heritages preventions and community engagement. i) National Tourism Policy aims to develop sustainable tourism industry that is environmentally friendly, culturally sensitive and socially responsible. It sets out strategies for improving the quality of tourism services and promoting sustainable strategies Existing tourism sustainability strategies with proven success. Agrotourism promotes rural areas and encourage visitors to

engage with local communities and traditions. This Plan helps

Established

Frameworks

Strategic Action

Policy

Plans

to preserve rural landscape and gives the opportunity to tourist to have an authentic experience for local culture. Detailed cultural heritage protection and disaster risk reduction strategies. Cyprus has a rich cultural heritage, and government has implemented various strategies to protect and preserve its cultural heritage. Antiquities law (1964) is the primary law governing the protection of archaeological sites, monuments in Cyprus. The Department of Antiquities is the main government agency responsible for the protection and management of cultural heritage in Cyprus. UNESCO World Heritage Sites: This Plan aims the protection and promotion of Cyprus Cultural and Natural Heritage The National Action Plan for a Green Economy is one of the tools towards resource efficiency, sustainable key consumption and production patterns and more sustainable growth. The Plan, which aims to exploit and enhance synergies between the environmental and other economic sectors, and includes measures in all key sectors, such as agriculture, water resources, biodiversity and green infrastructure, forests, energy, transport, industry, waste management, tourism, climate change and adaptation. Stakeholder Limassol Tourism Development & Promotion Company promote the Engagement further development of tourism of the Limassol Region and collaborate with public and private stakeholders for the benefit of all tourism

### Weaknesses

sectors

Regulatory	<ul> <li>Lack of regulation to protect cultural heritage sites from high</li> </ul>
Inconsistencies:	tourism.
	<ul> <li>Insufficient regulations to balance tourism expansion with the</li> </ul>
	prevention of archaeological sites.
	<ul> <li>Cultural heritage may be affected by the lack of inadequate</li> </ul>
	enforce of appropriate regulations.
	<ul> <li>Lack of appropriate strategies regarding the adequate</li> </ul>
	enforcement of policies related to tourism, heritage and
	climate change

Funding Limitations Infrastructure Deficiencies:	<ul> <li>Many popular tourist areas have a lack of pedestrian friendly infrastructure making difficult for tourist to have access. The public transport in Limassol Region is limited and make it difficult for tourists to access cultural heritage sites.</li> <li>Lack of pedestrian friendly infrastructure</li> <li>Insufficient public transport</li> <li>Lack of appropriate infrastructure to avoid heat during summer in heritage sites.</li> </ul>
Data and Monitoring:	

Harmonizing	Creation of territorial Working Group that will include the
Regulations	deputy Ministry of Tourism, Local Communities and the
	Department of Antiquities to establish new strategies and
	find solutions to reduce inconsistencies.
Securing	European funding through programmes in the context of 100 cities and
Funding	Subsidies for Deputy Ministry of Tourism
Technological	Footprint calculator
Integration	<ul> <li>Parking areas away from cultural heritage sites and ancient sites with shuttle services or walking to reduce emissions. Also, outside the archaeological sites billboards with information made with an innovative fabric to adsorb and disaggregate harmful particles present in the air. A technology that helps to fight atmosphere pollution caused by cars, heating systems and industrial emissions (The Brieth)</li> </ul>
Climate Resilience:	Climate resilience has an important role in Cyprus due to its vulnerability to climate impacts, such as high temperatures, humidity, droughts, flooding and sea level rise.

## Threats

Climate Change	Cyprus is facing significant challenges in adapting tourism and heritage
	site to the impact of climate change. Some key challenges include, i)
	Extremely heat weather: Cyprus is experiencing an increase of
	temperature during summer (May - October), which can make activities
	for tourists very challenging, including their visit in monuments and
	cultural heritage sites. ii) Impact on cultural heritage: Climate change

	can damage or destroy cultural heritage sites, including ancient
	monuments.
Seasonal	Cyprus is a destination with high fluctuations in seasonality and often
Tourism	face various challenges, such as overcrowding, high prices, inadequate
	infrastructure in peak seasons, as well as a lack of services and job
	opportunities in shoulder and low seasons.
Global Trends	
and Policies	
Stakeholder	Government may have conflicting priorities such as promoting
Engagement	economic growth versus protecting cultural heritage or conserving
Issues	natural resources. Also, may face pressure from different sectors such
	as businesses and local communities. Private sectors prioritize profits
	and short-term gains over long term sustainability. Local Communities
	have deep connection with the land and culture may feel marginalized
	or exploited by tourism development.

# Occitanie

## Strengths

Existing Legal	Comprehensive Legal Framework: The "CODE DU TOURISME" and
Frameworks	"LOI NOTRe" provide a solid regulatory basis for tourism governance
	in France, ensuring clarity and legal compliance in tourism
	practices.
	Decentralized Governance Structure: The division of
	responsibilities among Regions, Départements, and local
	communities allows for tailored and responsive tourism strategies
	that can better meet local needs.
Established	Regional Strategy for Employment, Sovereignty, and Ecological
Policy	Transformation (SRESTE)
Frameworks	Comprehensive Objectives: The plan outlines clear objectives
	addressing employment, sustainability, and cultural promotion for a
	holistic approach to tourism development.
	Regional Tourism and Leisure Development Plan
	contributing to the transition of regional tourism
	Promotion of Local Assets: Initiatives focused on the discovery and
	development of local businesses, expertise, and cultural assets for tourism.
Strategic	Sustainability Focus: Clear commitment to ensuring resource
Action Plans	sustainability and limiting negative environmental impacts from
	tourism.

 Alignment with Consumer Trends: Emphasis on providing highquality services that meet evolving consumer preferences, ensuring relevance in the market.

#### **Green New Deal Occitanie**

- Post-Crisis Resilience: The plan is a response to the COVID-19 crisis, aiming to establish a robust new economic and social model for the region.
- Integration of Tourism: Tourism is recognized as a key contributor within the Green New Deal, demonstrating its importance in regional recovery and sustainability.

# Regional Scheme for Planning, Sustainable Development, and Territorial Equality (SRADDET)

 Foundation for Transformation: Provides a solid groundwork for the Green New Deal, facilitating coordinated efforts toward sustainability.

#### **Sustainable Tourism Action Plan Occitanie**

- Comprehensive Action Framework: The plan outlines 33 specific actions to guide sustainable tourism practices, ensuring clear pathways for implementation.
- Stakeholder Engagement: Emphasizes collaboration between the CRTL and regional stakeholders to facilitate a smooth transition to sustainable tourism.
- Reference-Based Strategy: Builds upon existing frameworks and reference documents, ensuring a well-informed and cohesive approach to sustainability in tourism.

#### **ADEME OCCITANIE - French Ministry for ecological transition**

- **Funding Opportunities:** Significant financial support for ecological transitions in the tourism sector, enhancing the sustainability of hotels, campgrounds, and restaurants.
- Concrete Development Activities: Initiatives and activities to promote sustainable development within the tourism industry have been effectively mobilized in Occitanie.
- Partnerships for Sustainability: Collaboration between CRTL
   Occitanie and ADEME emphasizes a unified approach to developing sustainable tourism.
- Regional politics are nearly exclusively oriented towards sustainability

	The very high orientation of the strategies and plans under the cover
	of the "Green new deal Occitanie", as well as the high implication of
	the ADEMe have driven big and fast changes within the tourism
	Sustainability as a Financing Criterion: a tourism project that is
	not oriented on Sustainability cannot be financed
Stakeholder	All local, departemental and regional tourism destinations have
Engagement	sustainable tourism action plans or strategies. Tourism businesses
	are more and more aware on working on their impacts on the
	environment. The implication in quality certifications linked to
	sustainability is raising. Le national French Tourism Ministry is right
	now changing the Quality Tourism Label in a Ecoresponsible Quality
	Tourism Label. As it is widely developped in Occitanie, it is a
	supplementary strong asset to offer the private tourism businesses.

## Weaknesses

Regulatory	The main weakness is due to the shared tourism competence in
Inconsistencies:	the French territories. Everybody is responsible. A lot of time
	and money are spent by each territorial sphere, sometimes on
	the same issues (example communication, marketing,
	observation), being concurrent and not always partners.
Funding	As the Regions have the economical competences, they had to
Limitations	get very much implicated during the Covid 19 crisis in order to
	help tourism businesses to survive. This caused <b>big saving plans</b>
	for the following years and the funding capacity shrinked
	drastically in Occitanie.
Infrastructure	There are still some "White Zones" in Occitanie, not covered by
Deficiencies:	the high speed reseau. In 2017 there were 89 zones.
	The tourism on the seaside of Occitanie has been developed in
	the 1970. Those tourism resorts are still an asset to manage mass
	tourism in a positive way. But all the infrastructure and mostly the
	tourism rentals need urgently to be renovated.
	The raising of seawater level is menacing the big tourism resorts
	and beaches on the seaside right now, as we consider that the
	level of seawater will raise 1M within 2100.
Data and	•
Monitoring:	
L	

Harmonizing Regulations	<ul> <li>Most of the new regulations in tourism contain sustainability obligations.</li> </ul>
Securing Funding	•
Technological Integration	•
Climate Resilience:	<ul> <li>New tools adapted to the Tourism Sector help territories and businesses to get organised.</li> </ul>

## Threats

Climate Change	<ul> <li>A risk and vulnerability study is ongoing by the Region Occitanie.         Lack of water, droughts, fires, strong rainfalls, innondations,         high temperatures, strong loss of snow, are all threads to the         actual tourism development of Occitanie. Obligation of rapid         action is demanded.</li> <li>Difficulty to realise individual activities: everything has to be         treated within collective work and a lot of stakeholders. Action is         slowing down, but the climat impacts are more and more urgent.</li> <li>Deny of climate emergencies by politicians</li> </ul>
Seasonal Tourism	<ul> <li>The tourism in Occitanie is concentrated mostly on summer tourism (15/07 - 15/08), at the same moments when the climate stress is the strongest.</li> </ul>
Global Trends and Policies	•
Stakeholder Engagement Issues	The more water is lacking, the more there is a conflict to manage between agriculture and tourism activities. Agriculture is the first Regional Economy and Tourism the second one.

# Grenada

## Strengths

Existing Legal Frameworks	<ul> <li>Andalusian tourism benefits from strong regulatory support that promotes sustainable tourism, enhances economic growth, and fosters brand unity.</li> </ul>
	Effective safeguards are in place for cultural heritage and environmental protection, encouraging sustainable practices in tourism establishments.

Accessibility and fairness are prioritized, with provisions for equal access to resources, user protections, and fair competition. Strategic focus on deseasonalization and quality improvement boosts competitiveness and promotes year-round tourism. Plan Meta Andalusia 2027 is a strategic document for the future of Andalusian tourism activity, created on the basis of an in-depth analysis, which has taken into account a global economic analysis together with a study of tourism supply and demand. Established The General Plan for Sustainable Tourism in Andalusia (META 2027) Policy promotes a balanced approach to sustainable tourism, supporting Frameworks economic, social, and environmental goals. A comprehensive focus on territorial cohesion addresses challenges of seasonal tourism, overcrowding, and resource distribution, benefiting less economically developed areas. The Andalusian Climate Action Plan (2021-2030) advances sustainable tourism with targeted programs for emissions reduction, climate adaptation across sectors, and initiatives to promote public awareness and behavioral change. Emphasis on competitive, inclusive, and intelligent tourism growth strengthens Andalusia's tourism brand while supporting community identity and local human resources. Strategic Planning and Monitoring: Andalusia's tourism strategies, Strategic **Action Plans** such as Plan Meta 2027 and the Andalusia 2030 Urban Agenda, are supported by structured monitoring and evaluation frameworks that ensure adaptive improvements and accountability, with mid-term and final reports based on key performance indicators. Sustainability Commitment: Andalusia's comprehensive focus (through strategies such as mentioned before) on sustainable tourism promotes environmental conservation, social equity, and economic vitality through actions like waste management, energy efficiency, and sustainable mobility. **Cultural and Environmental Preservation**: Policies supporting cultural heritage and natural conservation ensure that tourism respects and enhances local identity, while reducing negative impacts on communities and ecosystems. **Social Inclusion and Equity**: By addressing social sustainability, the region promotes projects that increase awareness, support gender equality, and prevent exclusion, fostering a more inclusive tourism environment.

	Economic Resilience and Innovation: The focus on responsible consumption, local economy support, and smart tourism technologies provides a pathway for economic stability and growth, enhancing competitiveness.
	Climate Action Leadership: As a signatory of the Glasgow     Declaration, Andalusia aims to accelerate climate action in tourism, aligning with international efforts to combat climate change and reduce tourism's environmental footprint.
	Professional Development Initiatives: The plan addresses the need for improved professionalism and training in the tourism workforce, which can lead to higher service quality and a more skilled labour pool.
	Andalusian Historical Heritage Law will draw up a protocol to protect Andalusian heritage from catastrophic events.
Stakeholder Engagement	Strategic line Management of the overall sustainability of the destination Andalusia of the Plan Meta Andalucía 2027 has a programme focused on the creation of a commitment to responsibility among all actors in the tourism sector.

## Weaknesses

Regulatory Inconsistencies:	There are bureaucratic problems in creating a train line linking the coastal area of Granada with the capital and Jaén, which could form part of the Mediterranean Corridor. Such a line would improve the city's connection with other major cities, and would be a good access option for visitors to Granada
Funding Limitations	The slowness in the execution of certain projects financed by either the Andalusian Regional Government or the National Government, with a strong impact on the economic development of the province, such as the Rules dam, the construction of breakwaters on the coast, the closure of the ring highway or the Mediterranean corridor.
Infrastructure Deficiencies:	<ul> <li>The High Speed Line of the Granada province has neither the adequate frequency nor the necessary railway structure to be a major means of mobility for visitors. In addition, the need for the track to be buried to avoid excessive noise in residential areas.</li> <li>The connection between the airport and the city is supported by one bus line.</li> </ul>

Data and Monitoring:  •	Lack of specific information on economic, social and environmental sustainability.  Some of the issues being worked on are pollution. Granada is one of the most polluted cities in Spain, but there are few measures to reduce pollution. With the exception of the Low Emission Zone, there are only limitations in the city centre and certain historic districts. These are not sufficient to improve air quality.
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Harmonizing Regulations	The approval of measures to limit tourist flats will benefit those areas with a high influx of visitors, which may harm residents and cause some damage to the cultural heritage, such as the Albaicin area.
Securing Funding	The Council of Granada is committed to strengthening the Territorial Quality Brand of the province by financing a Tourism Sustainability Plan for the West of the region
Technological Integration	The Smart Tourist Destinations project, TurInGranada: Smart Tourism in Granada will be responsible for promoting the application of information and communication technologies to the operation of eminently touristic local entities, so that they become smart territories, with differential and competitive services that guarantee sustainable development.
Climate Resilience:	The Granada Climate Change Adaptation, Renaturalization and Resilience Plan will allow the city to be prepared to face the effects of climate change, adopt and reinforce actions to mitigate it, implement actions to naturalise the city and achieve a more resilient, healthy and sustainable environment. It is currently in draft form.

## Threats

Climate Change	<ul> <li>Climate Change will lead to reduced rainfall and consequently desertification of the province. This will affect the availability of water for both residents and visitors.</li> <li>In addition, this reduction will also affect the Sierra Nevada Ski Resort, which could see its opening period reduced due to the availability of snow.</li> </ul>
Seasonal Tourism	<ul> <li>Granada is highly dependent on seasonal tourism, with an overcrowded ski resort during its opening period and consequently an empty coastline and empty villages in the west of the region.</li> </ul>

	Moreover, in summer, the coastal area is saturated and the city has less visitor traffic.
Global Trends and Policies	The possibility of introducing the tourist tax, which is negatively perceived by stakeholders such as the Granada Hotel and Tourism Federation.
	<ul> <li>The creation of the new "register of information to accommodation and car rental companies", which could potentially conflict with the Data Protection Law, which stipulates penalties of up to €30,000 in case of infringement.</li> </ul>
Stakeholder Engagement Issues	Difficulties in the negotiations between the Granada City Council and the National Government for the burying of the High Speed Line and the improvement of its infrastructure

## Genoa

## Strengths

Existing Legal	1_Strong and comprehensive legal frameworks for tourism: *Tourism
Frameworks	Code (Legislative Decree No. 79 of 23 May 2011) on tourism regulation
Frameworks	, ,
	and market (last amendment: Law No. 238 of 23 December 2021).
	2_Strong and comprehensive legal frameworks for environment: *Environmental Protection Code (Legislative Decree 2006 No. 152, i.e. implementation of Directive 2000/60/EC), which gathers and coordinates environmental legislation (and provides for the following tools: the VIA and the VAS ensure that all projects (VIA), spatial plans and programmes (VAS) are carried out in compliance with the principles of environmental protection, quality of life and sustainable development.
	3_Strong and comprehensive legal frameworks for cultural heritage conservation: *The Cultural Heritage and Landscape Code (Legislative Decree No. 42 of 22 January 2004) regulates the protection of Italy's
	cultural heritage and landscape.
Established Policy	1_Well-defined policies frameworks/strategies addressing tourism at:
Frameworks	-UN level: *Global Code of Ethics for Tourism;
	-EU level: *European Agenda for Tourism 2030.
	2_Well-defined policies frameworks/strategies addressing climate
	change mitigation and adaptation/disaster risk reduction at:
	-National level: *National Climate Change Adaptation Strategy;
	-Regional level: *Regional Climate Change Adaptation Strategy.

- 3\_Well-defined policies frameworks/strategies addressing stakeholder engagement at:
- -UN level: \*Agenda 21;
- -Local level: \*Guidelines for the involvement of citizens in the processes of heritage valorisation (Forget Heritage project).
- 4\_Well-defined policies frameworks/strategies addressing sustainability and resilience at:
- -UN level: \*Agenda 2030;
- -EU level: \*The Urban Agenda for the EU;
- -National level: \*National Strategy for Sustainable Development; \*Urban Agenda of the Ministry of Infrastructure and Sustainable Mobility (methods and tools for an urban agenda for the sustainable development);
- -Regional level: \*Regional Strategy for Sustainable Development;
- -Local level: \*Bologna Charter for the Environment; \*Genoa Metropolitan Agenda for Sustainable Development and the Sustainability Charter; \*Genoa Lighthouse City Strategy.

# Strategic Action Plans

- 1\_Existing tourism sustainability action plans with proven success at:
- -National level: \*Tourism Strategic Plan 2023-2027;
- -Regional level: \*Plan for the Tourism 2020;
- -Local level: \*Genoa's Integrated Action Plan for Sustainable Tourism (Tourism Friendly Cities project).
- 2\_Detailed climate change mitigation and adaptation/disaster risk reduction action plans with proven success at:
- -National level: \*National Climate Change Adaptation Plan (PNACC);
- -Local level: \*Sustainable Energy and Climate Action Plan (SECAP);
- \*River Basin Management Plan/Flood Risk Management Plan; \*Civil Protection Emergency Plan.
- 3\_Detailed sustainability and resilience action plans with proven success at:
- -Local level: \*Genoa 2050 Action Plan for a Lighthouse City.
- 4\_Detailed cultural heritage protection action plans at:
- -Regional level: \*Territorial Landscape Coordination Plan (Ptcp);
- -Local level: \*Strategic Plan for Culture 2023-2026; \*Genoa's UNESCO management plan.
- 5\_Other important action plans/resources at:
- -National level: \*Italia Domani (Italian Next Generation EU Plan);

-Local level: \*Caruggi Integrated Action Plan – Urban Regeneration for the Historic Centre of Genoa; \*Methodological guidelines (Alter ECO project), which outlines the approach to analysing a tourist destination (including its carrying capacity).

### Stakeholder Engagement

- 1\_Strong collaborations in place between government, private sector, and local communities at various scales: \*the UNESCO Steering Committee, formed by the actors of the Quintuple Helix of Innovation; \*the Genoa Smart City Association; \*the working group that was formed as part of the Tourism Friendly Cities project, made up of stakeholders currently in contact with each other, etc.; \*the 'Genoa City Pass' (a card allowing visitors to access cultural heritage sites or explore the city by public transport without buying a specific ticket but charging a fee directly on the card) is also the result of a lasting multi-level partnership.
- 2\_Effective mechanisms for stakeholder engagement and conflict resolution at:
- -Local level: \*standard AA 1000 SES (2011); \*Guidelines for the involvment of citizens in the process of enhancement of goods belonging to the historical and cultural heritage (Forget Heritage project);
- -Internationale level: \*Participation in international exhibitions in order to network and raise awareness among local and non-local stakeholders; for instance, attending the International Tourism Exhibition 2024 (WTE) in Genoa.
- 3\_ Application at local level of effective participatory strategies in some cases, still being tested (thanks to the important role also played by the University of Genoa) in order to make up for the lack of data or specific skills, activation of onerous public-private partnerships, promulgation of innovative territorial governance tools, etc.

#### Weaknesses

#### Regulatory Inconsistencies

- 1\_Inconsistency between tourism, heritage conservation, climate change and stakeholder engagement strategic/spatial governance tools and lack of integrated management of sustainable tourism, cultural heritage and biodiversity. Although the UNESCO Management Plan may integrate all these issues into a single operational tool, it fails to address the issue of climate change.
- 2\_With specific regard to tourism: \*in Italy, the sector is not included in the list of matters of exclusive legislative competence of the State, nor of the Regions, leading to a slowdown in the transition to sustainable

	tourism due to overlapping competences of the different levels of government, short planning horizons and lack of sense of urgency amongst policy-makers (at various scale); *however, at local level, there's a lack of harmonious communication between different administrative levels and between departments of the same institution (silo mentality) and only small investments in favour of sustainable practices and efforts to diversify the tourist offer through the seasons.
Funding	1_Unbalanced relationship between the vast historical and cultural
Limitations	heritage to be preserved and the available funds.
	2_Limited economic resources to be found and difficulty in deciding how to use them.
Infrastructure Deficiencies	1_Infrastructure and technology deficits impacting tourism, cultural heritage conservation, climate change adaptation/mitigation and stakeholder engagement: *the tourist infrastructure is not always accessible due to a very dense urban layout, architectural sites with architectural barriers (some sites are privately owned), etc. *moreover, the digital infrastructure/technological services (helpful to the enjoyment of the tourist experience: on-site, remote, integrated) are poorly developed and their implementation/improvement is hampered by high initial and maintenance costs, specific technical skills not present locally, significant privacy and data security issues, etc.  2_Lack of an operational methodology – a planning system (PSS) – or integrated tools – spatial decision support (SDSS) – with which to identify the heritage to be preserved, retrofitted, etc.  3_Poor diversification of the tourist offers and (still) strong dependence of the sector on the primary attractions (the sea) and, therefore, on the weather conditions and the offers of international tour operators (e.g. cruise tourism).  4_Failure to ensure sustainable and participatory planning of new infrastructure.  5_Significant difficulties in adapting tourism and heritage to the effects of climate change.  6_Lack of effectiveness of marketing policies in engaging foreign tourists.  7_Vandalism.

# Data and Monitoring

- 1\_Insufficient data collection and evaluation/monitoring of social, environmental and economic performance: \*limited availability of quantitative data to support qualitative findings; \*unsystematised scientific knowledge of the Site and no understanding of the quantity and quality of existing research, publications and reports.
- 2\_ Lack of a standardised and mainstreamed methodology for building evidence-based multi-risk scenarios on climate change and overtourism (in general and specifically applied to UNESCO heritage).

### Stakeholder Engagement

- 1\_High heterogeneity of stakeholders and local actors involved which can complicate engagement in terms of: \*logistical organization of the whole process; \*fulfilment of public expectations; \* maintaining stable trust in the administration/government of the territory; \* dealing with resistance to change.
- 2\_Rigid formal governance architecture.
- 3\_Limited confidence of administration/government in the results achievable from the engagement and often little consideration of what actually emerges from the participatory process.
- 4\_Specifically for the case of the UNESCO site of Genoa: difficulties in engaging private owners of some architectural Rolli (different perspectives and objectives to achieve).

### **Opportunities**

# Harmonizing Regulations

- 1\_Future changing trends in policy frameworks for sustainable tourism, heritage conservation, climate change and stakeholder involvement.
- 2\_Potential to align regulatory frameworks across territories to reduce inconsistencies: \*when it comes to the International level, the UNESCO network may facilitate knowledge sharing between territories to address common challenges, exploit collective strengths and propose coherent and harmonious regulations; \*at local level, concerning Genoa, the Genoa's UNESCO Management Plan and the Liguria's Regional Landscape Plan (both under review or in the process of being reviewed) might incorporate some inconsistencies and harmonize the legislation; moreover, since the end of 2022, Genoa together with the Romanian city of Galati has coordinated the Urban Agenda Partnership on Sustainable Tourism, a partnership that has developed a first draft of the Action Plan.

3\_Opportunity to develop integrated strategies balancing tourism growth with heritage conservation, climate change mitigation/adaptation and stakeholder engagement: \*acknowledgment of the synergic relationship amongst these sectors as a driver of territorial development; \*especially the outbreak of COVID-19 pandemic has highlighted the need to rethink the relationship between cultural heritage and tourism from the perspective of social innovation and territorial development. Securing 1\_Trend of increased funding in the fields of tourism, heritage conservation, climate change and stakeholder engagement and/or **Funding** strategies to stem the economic shortage (i.e. participating in EU projects). Technological 1\_Availability on the market of effective technological tools (or Integration promising technologies still under experimentation) for monitoring, managing and promoting sustainable and resilient tourism. 2\_Utilization of global technological trends impacting tourism: \*interactive maps (in totems or apps) to indicate local attractions, accommodation and access routes; \*integrated apps to disseminate information on sustainable practices (local customs and traditions, guidelines for visiting cultural heritage, weather conditions/crowding of sites in real time) that leverage the concept of gamification; \*IoT to monitor environmental conditions (air and water quality, traffic. ..) and help manage the impact of tourism in fragile areas; \*VR viewers and the metaverse to offer virtual tours of sites, to increase the accessibility of sites and reduce 'traffic'; \*social media for promoting sustainable tourism and the importance of heritage protection; \*encouraging sustainable means of transport (e-bikes, walking paths, discounted tickets), etc. These are all strategies that -from the perspective of the phygital experience- properly align with the increase in personalisation and customisation of tourism (the advent of solo trips, trips organised by remote workers, visits to sites/destinations because they are sponsored by content creators, highly experiential trips, etc.). 3\_Utilization of global technological trends impacting heritage conservation: \*IoT to monitor environmental conditions (air and water quality, traffic. ..) and help manage the impact of tourism in fragile areas; \*satellite mapping system of the state of conservation of sites, integrating the data into an interoperable monitoring dashboard combined with proximity sensors to collect data and information on the effects of air pollution, intense rainfall and rising temperatures on the

	structures, decorations and architectural elements of the cultural heritage.
Climate	1_Implementation of nature-based solutions and other measures to
Resilience	enhance climate resilience.
	2_Adoption of strategies for climate change mitigation and adaptation.
	3_ Promotion of circularity in priority sector: capacity building and awareness-raising activities; incentive programmes for workers, citizens and visitors; interventions with nudges; urban symbiosis projects; etc.
Global Trends	Changing trends in tourist habits and preferences with a view to sustainability: particular interest in sustainable, outdoor, experiential tourism.

## Threats

Climate Change	1_Increase in extreme events/climate-related phenomena: fragility of
	coastal areas (pollution, over-occupation, over-exploitation);
	hydrometeorological hazards (heat waves, intense flood events, urban
	fires); loss of biodiversity, etc. It is wise to consider, in addition to the
	direct effects of climate change, also some risks that can precede,
	succeed or interact simultaneously with them, such as the worsening
	of the international health scenario (tourism sector has been among the
	ecosystems most severely affected by Covid-19 pandemic), etc.
	2_Significant challenges related to adapting tourism and heritage sites
	to the impacts of climate change.
Seasonal	1_Effects of seasonal fluctuations of tourists (e.g. pressure on
Tourism	resources and infrastructure).
	, and the second
	2_Challenges related to managing seasonal fluctuations in tourism, i.e.
	workforce management.
	3_Overdependence on peak seasons causing strain on resources and
	infrastructure: economic instability; infrastructure stress; environmental impact.
	environmentat impact.
Global Trends	1_External global trends and policies impacting local tourism and
and Policies	heritage conservation efforts.

	2_Social trends, such as changes in tourist behaviour and preferences, affecting sustainability: overcrowding of tourist destinations; cultural appropriation; loss of authenticity; impact on the daily life of residents, as well as on local culture and heritage area.
	3_Low transition towards sustainable tourism: although it's for all intents and purposes a branch of sustainable development, it must independently develop its own approach and make it consistent with other sustainable development actions, as demonstrated by the Manila Declaration, 1980: it is not an economic sector taken into consideration in the Stockholm Conference, 1972 and in the report "Our Common Future", Brundtland Commission, 1987; compared to other aspects of sustainable policy (e.g. nature conservation, job creation, promotion of local culture and products, etc.), it is only timidly mentioned in Agenda 2030.
Stakeholder Engagement Issues	<ol> <li>Difficulties in effectively engaging and giving responsibility to key stakeholders, promoting long-term impact on the territory and communities.</li> <li>Potential conflicts between stakeholders, including government, the private sector and local communities, the non-resolution of which may lead to the failure of adopted strategies, subsequent waste of resources, disaffection, etc., negatively affecting subsequent</li> </ol>
	collaborative governance experiences.

# Cetinje

## Strengths

Legal	Montene	egro's exis	ting lega	l frameworks	s regarding		
	cultural	heritage:	Law or	Protection	of Cultural	Property/Law	on
	Protection	on	of		Cultural	Heri	tage
	(https://v	wapi.gov.n	ne/down	load/626337	'94-e279-4b8	<u>30-a8a4-</u>	
	4043c3fa	a2a0e?ver	sion=1.0	)			
	tourism:	Law	on	Tourism	and	Hospitality	(
	https://w	api.gov.m	ie/downl	oad/e21ecba	a9-b1da-4d7	0-8c61-	
	e55ba30	3726c?ve	rsion=1.0	))			
	environr	ment:		Enviro	nmental		Law
	(https://v	wapi.gov.n	ne/down	load/1e04e0	)29-722a-4af	2-b020-	
	cc582da	da8b0?ve	rsion=1.0	0)			
	Legal	cultural Protection (https://www.assa.com 4043c3fa tourism: https://www.assa.com environm (https://www.assa.com (https://www.assa.co	cultural heritage: Protection (https://wapi.gov.m 4043c3fa2a0e?ver  tourism: Law https://wapi.gov.m e55ba303726c?ver  environment: (https://wapi.gov.m	cultural heritage: Law on Protection of (https://wapi.gov.me/down4043c3fa2a0e?version=1.0 tourism: Law on https://wapi.gov.me/downle55ba303726c?version=1.0 environment: (https://wapi.gov.me/down/down/down/down/down/down/down/down	cultural heritage: Law on Protection Protection of (https://wapi.gov.me/download/626337 4043c3fa2a0e?version=1.0)  tourism: Law on Tourism https://wapi.gov.me/download/e21ecbae55ba303726c?version=1.0)  environment: Enviro	cultural heritage: Law on Protection of Cultural Protection of Cultural (https://wapi.gov.me/download/62633794-e279-4b84043c3fa2a0e?version=1.0)  tourism: Law on Tourism and https://wapi.gov.me/download/e21ecba9-b1da-4d7e55ba303726c?version=1.0)  environment: Environmental (https://wapi.gov.me/download/1e04e029-722a-4af	cultural heritage: Law on Protection of Cultural Property/Law Protection of Cultural Heri (https://wapi.gov.me/download/62633794-e279-4b80-a8a4-4043c3fa2a0e?version=1.0)  tourism: Law on Tourism and Hospitality https://wapi.gov.me/download/e21ecba9-b1da-4d70-8c61-e55ba303726c?version=1.0)  environment: Environmental (https://wapi.gov.me/download/1e04e029-722a-4af2-b020-

Established	National plan of adaptation to climate change (NAP) -
Policy	http://www.napmontenegro.me/ in draft version.
Frameworks	
	Educating Public on Participation in Policy Creation (ME0065) -
	https://www.opengovpartnership.org/members/montenegro/commit
	ments/ME0065/
Strategic Action	-Montenegro Tourism Development Strategy :
Plans	https://www.montenegro.travel/uploads/2_BUSINESS/Analiti%C4%8D
	ke%20kartice%20i%20putni%20nalozi/Strateska%20dokumenta/mont
	enegro-tourism-development-strategy-2022-2025-with-the-action-
	<u>plan.pdf</u>
	Oceanies for Constainable Tauriere Initiatives
	-Centre for Sustainable Tourism Initiatives -
	https://www.cstimontenegro.org/CSTI-About_us-h-266x92
	-The Strategy for Disaster Risk Reduction 2025-2030
	The character increases and a second
	-The Midterm Review of the Implementation of the Sendai Framework for
	Disaster Risk Reduction 2015-2030 (https://sendaiframework-
	mtr.undrr.org/media/84438/download?startDownload=20241016)
Stakeholder	Montenegro has a rich cultural heritage, with historical sites and
Engagement	traditions that offer unique and authentic experiences for visitors
	interested in sustainable and responsible tourism. The Montenegrin
	government has shown a strong commitment to sustainable
	development and has implemented policies and initiatives to support
	the growth of green practices in various sectors, including tourism as
	there is a growing global awareness of the importance of sustainable
	tourism. Therefore, Montenegro has the opportunity to capitalize on this
	trend by promoting its commitment to green and sustainable practices.
	-Public-Private Partnerships in Montenegro - Accountability,
	transparency and efficiency (https://media.institut-
	alternativa.org/2012/08/institute-alternative-public-private-
	partnerships-in-montenegro.pdf)
	-Stakeholder engagement plan for Montenegro
	(https://wapi.gov.me/download/47ec759c-1251-4169-9b84-
	0cdbf5e17c73?version=1.0)

## Weaknesses

Regulatory	Vagueness and inconsistencies of provisions, as well as situations
Inconsistencies	where one legal situation is differently interpreted by different
	competent authorities resulting in differing subsequent actions.
	Frequent changes within regulatory framework usually have negative

	effects on stability, legal security and predictability of business, which
	prevents companies from creating long-term business policies. The
	selective implementation of regulation is another highlighted issue.
Funding	The implementation of sustainable practices often requires financial
Limitations	and human resources, which may be limited, especially for small and
	medium-sized tourism businesses in Montenegro. Some stakeholders
	within the tourism industry may have limited awareness of the benefits
	and opportunities associated with sustainable practices, requiring
	educational campaigns and training programs.
Infrastructure	The road to Zabljak Crnojevica is insufficient, and non-approachable
Deficiencies	during winter season from Cetinje, only from Podgorica with off-road
	vehicles. Right now, the government is working on building a new road
	to Zabljak Crnojevica.
Data and	N/A
Monitoring	

Harmonizing	The government has implemented regulations and policies aimed at
Regulations	reducing greenhouse gas emissions, improving energy efficiency,
riogatationo	and promoting sustainability in the tourism industry, as well as
	environmental protection, waste management, and energy
	efficiency, which are relevant to promoting sustainable practices in
	the tourism industry.
	the tourish muustry.
	Regulatory framework in Montenegro Report- The Enabling
	Environment for Sustainable Enterprises in Montenegro
	(https://poslodavci.org/en/publications/regulatory-framework-in-
	montenegro)
	······································
	Cultural Tourism and Community Engagement: Insight from
	Montenegro
	(https://www.researchgate.net/publication/352160208 Cultural T
	ourism_and_Community_Engagement_Insight_from_Montenegro)
Securing	Montenegro fosters collaborations and partnerships with international
Funding	organizations, NGOs, and sustainable tourism networks to access
	funding, knowledge, and best practices in implementing green policies
	and initiatives.
Technological	Project Due Mari, social media, eco tourism (green practices), Open
Integration	Tourism mobile app
Climate	The government has implemented regulations and policies aimed at
Resilience:	reducing greenhouse gas emissions, improving energy efficiency, and
	promoting sustainability in the tourism industry

## Threats

Climate Change	Montenegro is highly exposed to climate change risks, including floods,
	wildfires, temperature increases, and sea level rise. Promoting
	sustainable practices in the tourism industry can help mitigate these
	risks and ensure the long-term resilience of the sector.
Seasonal	Challenges related to managing seasonal fluctuations in tourism
Tourism	(inadequate traffic infrastructure, lack of sign posts etc)
	Žabljak Crnojevića is an important cultural monument in Montenegro, that lacks tourism activities. Since tourism on this location is yet to be established, this project could create the best conditions for further development and its sustainability.
Global Trends	The tourism industry in Montenegro has been a significant contributor to
and Policies	the country's economy, and promoting sustainable practices can
	contribute to long-term economic growth. Investment in sustainable
	infrastructure: Montenegro has the opportunity to attract investments in
	sustainable tourism infrastructure, such as renewable energy projects,
	eco-friendly accommodations, and transportation systems
Stakeholder	Local community needs better communication with Administration for
Engagement	Protection of Cultural Property of Montenegro, as well as better
Issues	communication with other relevant national institutions. Also, the
	procedure for transferring the ownership of the monument from the
	primary school in Rijeka Crnojevica to the Old Royal Capital Cetinje is underway.

## Athens

## Strengths

Existing	Legal	Athens benefits from a strong legal foundation supporting the protection
Frameworks		of its rich historical sites, natural environment, and cultural heritage.
		Key legislation includes national laws for environmental conservation
		and cultural property protection, as well as international conventions
		such as the European Convention on the Protection of the
		Archaeological Heritage. These frameworks ensure that development
		respects and preserves Athens' historical and environmental assets.
		The Greek Tourism 2030 National Action Plan provides a long-term
		vision for sustainable tourism, with objectives that align with Athens'
		unique needs as both a cultural hub and a metropolitan center.
Establishe	ed	Athens has implemented robust climate change policies, including the
Policy		National Climate Law, which aims at achieving climate neutrality and
Framewor	ks	adapting to environmental challenges. These frameworks provide a
		basis for Athens to implement sustainable practices that mitigate

climate change impacts on tourism and protect local resources,
particularly water and energy.
The existence of regional adaptation plans, like the Western Greece
Regional Plan for Adaptation to Climate Change, includes strategies
applicable to Athens, providing the city with a blueprint to anticipate and
address environmental shifts impacting tourism.
Well-defined action plans for cultural heritage protection, such as the
2022 ICOMOS International Cultural Heritage Tourism Charter, offer a
foundation for safeguarding Athens' iconic sites while allowing for
sustainable tourism development.
Disaster risk reduction strategies, including the National Plan for Crisis
Management and Hazard Mitigation, offer protective measures for
Athens' tourism infrastructure and heritage sites, helping the city
prepare for natural disasters and climate-related hazards.
Athens benefits from structured engagement between government
bodies, private tourism operators, and local communities. Existing
mechanisms encourage stakeholder involvement, which helps
integrate diverse perspectives and promotes collaboration in areas like
tourism growth, site preservation, and community development.
The establishment of stakeholder-focused initiatives, such as the
Territorial Working Group, enhances the city's ability to coordinate and
implement sustainable tourism practices effectively.

## Weaknesses

Regulatory	Athens faces regulatory inconsistencies, particularly due to overlapping
Inconsistencies	jurisdictions between national, regional, and municipal authorities. This complexity often delays the approval process for new projects, such as infrastructure improvements in heritage areas.
	Bureaucratic hurdles, especially concerning permits for site renovations or conservation activities, hinder timely execution of initiatives that could improve tourism infrastructure and enhance site accessibility.
Funding Limitations	Sustainable tourism and heritage conservation efforts in Athens are often hampered by limited funding, particularly in areas under the jurisdiction of the Ministry of Culture. The city's dependence on national budget allocations restricts its capacity for large-scale or innovative projects.
	Funding limitations are particularly noticeable in infrastructure projects essential for accommodating increased tourism, such as improved

	transportation links to popular historical sites or new facilities that meet
	modern sustainability standards.
Infrastructure	Infrastructure to support tourism, such as transportation and
Deficiencies	accommodations in certain historical areas, is lacking. Athens' road
	network in these regions is often inadequate, and public transportation
	options are limited, impacting tourists' accessibility to important
	cultural sites.
	Existing infrastructure in popular areas is outdated and may not meet
	the current demands of sustainable design, making it challenging to
	accommodate growing tourism without environmental impact.
Data and	Athens currently lacks a comprehensive system for gathering and
Monitoring	analysing data on tourism patterns and environmental impacts. This
	limits the city's ability to make data-driven decisions to optimize
	sustainable practices.
	Insufficient monitoring and enforcement of environmental regulations
	lead to inconsistent compliance, especially in high-traffic tourist zones,
	putting the city's heritage sites at risk of degradation.

There is an opportunity to streamline regulations across municipal,
regional, and national levels, which would reduce red tape and improve
project implementation efficiency. A harmonized regulatory approach
could make it easier to adopt innovative technologies and solutions that
benefit Athens' tourism sector.
Developing a city-specific framework that balances tourism growth with
heritage conservation would allow Athens to implement policies
tailored to its unique needs, fostering a more sustainable tourism
industry.)
Identifying and securing alternative funding sources, including
partnerships with EU funding programs and international cultural
organizations, could help Athens finance infrastructure projects and
sustainable tourism initiatives.
As the global focus on sustainable tourism grows, there are more
opportunities for Athens to attract investments in eco-friendly
accommodations, green transportation, and renewable energy
solutions that can cater to environmentally conscious tourists.
Athens can adopt digital technologies, such as real-time monitoring
systems for visitor flows and environmental conditions, to better
manage tourism and protect heritage sites. For instance, 3D mapping

	and camera installations could track and mitigate wear on historical
	monuments.
	Technologies like mobile apps for tourists could promote less-visited
	areas of the city, spreading tourism impact more evenly and reducing
	pressure on over-touristed sites like the Acropolis.
Climate	Athens can enhance its climate resilience through nature-based
Resilience:	solutions, such as green roofs, shaded walkways, and increased green
	spaces. These measures can help counteract urban heat and create a
	more pleasant environment for tourists.
	Integrating climate adaptation strategies into city planning could protect
	Athens' historical sites from extreme weather events and mitigate risks
	associated with rising temperatures, which threaten both tourism
	infrastructure and visitor comfort.
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## Threats

Climate Change	Athens faces significant risks from climate change, including rising
	temperatures and increased likelihood of heatwaves, which may deter
	tourists during summer months. This also places additional strain on the
	city's aging infrastructure and historical sites. Extreme weather events,
	such as flash floods and fires, pose a direct threat to heritage sites,
	many of which are located in vulnerable areas with limited protections
	against climate-related hazards.
Seasonal	Tourism in Athens is highly seasonal, with a sharp influx of visitors in
Tourism	summer. This creates logistical challenges in managing peak season
	demand, often resulting in overcrowding and excessive wear on popular
	attractions.
	Overdependence on peak seasons places strain on local resources,
	from water supply to waste management, and can lead to resident
	dissatisfaction, creating tensions between tourism and community
	needs.
Global Trends	External factors, such as changes in travel trends and international
and Policies	policies related to sustainability, can impact Athens' tourism sector.
	Increased demand for eco-friendly destinations may require Athens to
	adopt stricter sustainability practices to remain competitive. Social
	trends, including changing visitor preferences towards experiential and
	eco-conscious travel, may challenge Athens to adapt and diversify its
	tourism offerings beyond traditional historical attractions.
Stakeholder	Engaging diverse stakeholders, including government, private sector,
Engagement	and local communities, remains a challenge. Conflicting interests
Issues	between these groups, such as balancing economic growth with
	preservation, can delay or complicate sustainable tourism projects.
	Resistance from local stakeholders, who may perceive tourism as

disruptive or inadequately beneficial, can limit the effectiveness of
collaborative efforts aimed at promoting sustainable practices and
conservation efforts in Athens.

## **Summary**

#### **Strengths**

The regions of Rome, Genoa, Occitanie, Limassol, Dubrovnik, Athens, Cetinje, and Granada each demonstrate robust frameworks for tourism management, environmental protection, and cultural heritage preservation. EU membership (for relevant regions) allows alignment with both national and EU-wide standards, fostering sound governance in sustainable tourism, climate adaptation, and cultural preservation. Cities like Dubrovnik and Rome lead in integrating climate resilience with sustainable tourism, implementing structured policies that translate into effective strategies, such as climate adaptation and sustainable energy action plans. This integration is bolstered by community engagement platforms, allowing residents to participate actively in decision-making.

Each region has developed specific strategies to protect cultural heritage while promoting sustainable tourism, as seen in Dubrovnik's "Respect the City!", Strategic Plan for Culture 2023-2026 of Genoa and Rome's management of UNESCO heritage sites. Also there are climate strategies such as Greece National Climate Law, whit focus on transition to climate neutrality and adaptation to climate change, emergency provisions to address the energy crisis and protect the environment. Such initiatives balance tourism growth with environmental and heritage preservation and emphasize risk preparedness. Across these cities and regions, stakeholder collaboration is a key strength, uniting government, private sector, and community interests to develop and implement inclusive tourism policies. Dedicated institutions, such as the Dubrovnik Development Agency, the Rome Superintendency for Cultural Heritage, and various local heritage boards, support the alignment of objectives and ensure that tourism development remains sustainable and community cantered.

#### Weaknesses

Despite strong foundations, challenges persist. In Dubrovnik, Rome, and Limassol, regulatory inconsistencies—such as misalignment with EU Green Deal standards—impede seamless policy implementation. Bureaucratic hurdles, frequent legislative changes, and funding shortages add to these difficulties, particularly in securing resources for workforce development and maintaining infrastructure. Additionally, historical recovery efforts in cities like Dubrovnik and Granada face delays due to limited funding, impacting cultural heritage restoration and infrastructure modernization.

Infrastructure deficiencies further challenge sustainable tourism in these regions. Peak-season congestion strains traffic, water, and waste management systems in cities like Dubrovnik, Rome, and Limassol, while inadequate sustainable design in new projects highlights a gap between strategic planning and execution. Insufficient data collection and enforcement mechanisms hinder effective oversight, with cities like Dubrovnik and Rome needing stronger monitoring systems and digital integration to enhance their tourism management capabilities.

These cities and regions have substantial opportunities to lead in sustainable tourism and cultural preservation. Harmonizing regulations with broader EU frameworks can reduce policy inconsistencies, making it easier to integrate strategies that balance tourism with heritage conservation. Improved access to EU funding and alternative financing avenues, such as sustainable tourism grants, would address funding gaps, enhancing infrastructure, workforce development, and local economic integration.

Smart city technologies represent a promising opportunity to improve visitor management, traffic flow, and environmental monitoring, enhancing tourism experiences and supporting resource conservation. Developing year-round tourism offerings could alleviate seasonal pressures, as seen in Dubrovnik's attempts to diversify tourism beyond the peak summer months. Embracing climate resilience through nature-based solutions will protect the cities' cultural and natural assets from climate impacts, preserving their appeal to future generations.

#### **Threats**

These regions face interconnected threats, primarily from climate change, seasonal tourism patterns, global tourism trends, demographic shifts, and stakeholder engagement challenges. Climate-related risks, such as flooding, extreme heat, and sea-level rise, threaten infrastructure and cultural sites in coastal cities like Dubrovnik, Athens and Limassol, requiring urgent climate resilience efforts. Seasonal tourism influxes place immense pressure on resources, degrading the quality of life for residents and complicating workforce dynamics. Addressing these requires policies that encourage off-peak travel and diversified tourism models.

Global trends, such as overtourism and environmental concerns, necessitate proactive approaches, including sustainable infrastructure investments and responsible resource management. Effective stakeholder engagement remains challenging, as conflicts between government bodies, businesses, and communities create fragmented policies. Additionally, demographic challenges, including youth migration and skill shortages, are problematic in cities like Dubrovnik and Cetinje, reducing local workforce availability for the tourism sector.

#### Conclusion

Rome, Genoa, Occitanie, Limassol, Dubrovnik, Cetinje, and Granada face shared strengths and challenges in their pursuit of sustainable tourism. By focusing on regulatory alignment, infrastructure improvement, smart technology integration, climate resilience, and year-round tourism, these cities can protect their cultural and natural heritage while enhancing economic stability. Coordinated planning, community engagement, and innovative solutions will enable these regions to serve as exemplary models of sustainable tourism and heritage preservation. Through these efforts, each city and region can balance its unique identity with the demands of a dynamic global tourism landscape, securing a prosperous and sustainable future.

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