

## CUTS International Comments for the Draft Rajasthan Tourism Unit Policy

### **Background**

Consumer Unity & Trust Society (CUTS) expresses its gratitude to the Department of Tourism, Government of Rajasthan for inviting comments and suggestions on the Draft of Rajasthan Tourism Unit Policy 2024. We have closely examined and reviewed the Policy Paper and with further analysis, CUTS is pleased to submit its comments.

### **1. Analysis of Key Points:**

- 1.1. **Single Window Clearance** (Section 4): This section outlines a streamlined approval process for tourism projects. Focusing on a single clearance window minimises bureaucratic delays, a crucial aspect for timely project execution. However, additional clarity on inter-departmental coordination through the SWCS might improve overall efficiency.
- 1.2. **Obligation on Other Departments** (Section 5): This is vital for inter-departmental cooperation, ensuring that all state government departments adhere to the definitions set by the tourism policy. Point 5.7 is particularly relevant as it discusses land conversion powers for tourism projects, giving the tourism department significant leverage. An addition here could be specifying coordination mechanisms to ensure other departments are aligned seamlessly.
- 1.3. **Allotment of Government Land** (Section 6): The focus on using government land at agricultural or residential DLC rates benefits developers by making land acquisition more affordable. The provision for identifying suitable government land by authorities ensures the prioritisation of tourism projects. A potential improvement here could be the addition of environmental considerations for land identification to align with green tourism goals.
- 1.4. **Conversion of Land for Tourism Units** (Section 7): The time limits for land conversion and building plan approval ensure accountability in the administrative process. Exemptions for heritage hotels encourage the preservation of cultural assets. However, clearer guidelines regarding heritage property maintenance would ensure these benefits aren't misused.

### **2. Suggestions for Amendments/Additions:**

- 2.1. Certain additions can be made in "3. Definition of A Tourism Unit"
  - 2.1.1. **Eco-Resorts and Sustainable Accommodations:** Encourage the establishment of eco-resorts, green hotels, and eco-friendly homestays, particularly in sensitive ecosystems like the Aravalli and desert regions. These accommodations should focus on sustainable practices such as solar power, rainwater harvesting, and waste management. They can offer

immersive nature experiences such as wildlife safaris, nature walks, and birdwatching tours, drawing attention to Rajasthan's lesser-known natural treasures.

- 2.1.2. **Green Tourism Circuit:** Develop circuits focused on eco-tourism and environmental conservation. This could include routes through Rajasthan's national parks (e.g., Ranthambore, Sariska) and natural heritage sites, promoting activities like wildlife conservation, reforestation projects, and community-based tourism in partnership with local tribes. This circuit can also involve ecologically sensitive areas like Mount Abu and the Sambhar Salt Lake.
- 2.1.3. **Destination Weddings in Offbeat Locations:** While Udaipur and Jaipur are already popular for destination weddings, the policy could promote less-explored locations such as Bundi, Jaisalmer, and Bikaner for wedding tourism. These locations offer royal palaces, forts, and heritage hotels that are not as commercialised, providing a more intimate and unique experience. Encourage local artisans and cultural performances to be integrated into wedding packages, promoting the local economy.
- 2.1.4. **Adventure and Sustainable Sports Units:** Promote eco-friendly adventure tourism in underdeveloped areas like the Shekhawati region or Barmer. Adventure tourism activities like trekking, hot air ballooning, cycling tours, and desert camping could be added while ensuring minimal environmental impact. This can help develop the infrastructure in these areas without disrupting the ecological balance.
- 2.1.5. **Cultural and Heritage Tourism in Underdeveloped Areas:** Develop cultural and heritage tourism in lesser-known towns like Karauli, Barmer, and Sikar. Promote these areas as hubs for cultural festivals, fairs, and local handicrafts, enhancing the appeal for domestic and international tourists. This could include collaborating with local artists and craftspeople, hosting heritage tours, and creating cultural centres.
- 2.1.6. **Agri-Tourism:** Encourage rural tourism by promoting visits to traditional Rajasthani villages. This would provide tourists with an authentic experience of local customs, crafts, cuisine, and farming practices. Agri-tourism, where visitors can participate in agricultural activities like organic farming, camel breeding, and dairy production, would support local economies while promoting green tourism.
- 2.1.7. **Desert Rehabilitation Tourism:** In areas like Jaisalmer and Barmer, there is potential for showcasing desert rehabilitation projects. These units could offer educational tours for tourists about sustainable practices in water conservation, desert flora and fauna, and environmental conservation efforts in the desert ecosystem.

- 2.1.8. **Underdeveloped Region Focus: Chambal:** The Chambal River area, which is underdeveloped, could be promoted for river safaris, bird watching, and eco-lodges. With its unique biodiversity and proximity to areas like Dholpur, it offers untapped potential for eco-conscious tourists.
- 2.1.9. **Incentives for Green Infrastructure:** Create incentives for tourism businesses that adopt green infrastructure, such as electric vehicles, solar energy, or zero-waste initiatives. This could encourage broader investment in sustainable tourism across the state. These units would not only help Rajasthan tap into emerging tourism trends but also ensure a balanced approach to growth, taking into account environmental sustainability and the need to promote lesser-known regions.
- 2.2. Certain additions can be made in **”5. OBLIGATION ON OTHER DEPARTMENTS OF STATE GOVERNMENT”**
  - 2.2.1. **Point 5.3 - Tourism Facility Zones (TFZs)**
  - 2.2.2. **Suggestion:** Increase the earmarked areas for Tourism Facility Zones (TFZs) from 2% to 5% in underdeveloped regions.
  - 2.2.3. **Relevance:** This would promote tourism in rural and less-developed areas, in line with the policy’s objectives to boost green and sustainable tourism across Rajasthan.
  - 2.2.4. **Point 5.6 - Uniformity of Language in Notifications**
  - 2.2.5. **Suggestion:** Add a provision to include translations of important clauses into regional languages to ensure better understanding at the local level.
  - 2.2.6. **Relevance:** This will make the policy more accessible, especially in rural areas, helping smaller stakeholders (local authorities, and businesses) understand and implement it.
- 2.3. Certain additions can be made in **”6. ALLOTMENT OF GOVERNMENT LAND FOR TOURISM UNITS”**
  - 2.3.1. **Point 6.1 - Allotment of Government Land**
  - 2.3.2. **Suggestion:** Include a clause stating that environmental assessments must be conducted before allotment for tourism units.
  - 2.3.3. **Relevance:** To promote sustainable tourism, ensuring environmental protection and considering the ecological impact of tourism projects in sensitive zones is vital.
- 2.4. Certain additions can be made in **“7. CONVERSION OF LAND FOR TOURISM UNITS”**
  - 2.4.1. **Point 7.1 - Conversion of Land Charges**

- 2.4.2. **Suggestion:** Explicitly mention that tourism projects adhering to green tourism standards should be exempt from conversion charges.
- 2.4.3. **Relevance:** This incentivises projects that align with environmentally friendly practices, promoting sustainable development.
- 2.4.4. **New Section - Green Tourism Certification**
- 2.4.5. **Suggestion:** Introduce a section mandating the inclusion of green tourism certification for new tourism projects, providing guidelines on energy efficiency, water conservation, and waste management.
- 2.4.6. **Relevance:** As Rajasthan aims to boost sustainable tourism, having a certification system would encourage developers to follow eco-friendly practices, helping the state meet its green tourism goals.
- 2.4.7. **New Section - Gender Parity Certification**
- 2.4.8. **Suggestion:** Introduce a Gender Parity Certification for tourism projects, with guidelines promoting equal representation of women across all levels, including leadership and operations. The certification would encourage businesses to adopt policies supporting women’s employment, fair wages, and career advancement. Incentives could be provided for projects meeting these gender parity standards.
- 2.4.9. **Relevance:** This will position Rajasthan as a leader in gender-inclusive tourism. Empower women economically by increasing their participation in tourism. Promotes inclusive growth in line with Rajasthan's development goals. Aligns with global SDG 5 standards on gender equality.
- 2.5. Certain additions can be made in “9. **REGULARIZATION OF EXISTING HOTELS**”
  - 2.5.1. **Amendment:** Include a structured fee or penalty system for non-compliant hotels operating without permission. This ensures better compliance and discourages future irregularities.
  - 2.5.2. **Reason:** Establishing a clear penalty framework will promote transparency and encourage hotels to regularise their operations swiftly.
- 2.6. Certain additions can be made in “10. **INCENTIVES FOR TOURISM UNITS**”
  - 2.6.1. **Addition:** Introduce a **Green Initiative** incentive that offers reimbursements for units implementing eco-friendly measures, such as water recycling or solar energy, similar to the green provisions in RIPS 2022.
  - 2.6.2. **Reason:** Aligning with the state's sustainability goals will promote green tourism and reduce the environmental impact of tourism infrastructure

- 2.7. Certain additions can be made in “11. **INCENTIVES FOR SKILL DEVELOPMENT**”
    - 2.7.1. **Addition:** Propose an **Employment Booster** that rewards tourism units for creating jobs for local youth, beyond the minimum requirement.
    - 2.7.2. **Reason:** Encouraging the creation of more employment opportunities, akin to RIPS 2022, can significantly benefit local communities by ensuring inclusive growth
  - 2.8. Certain additions can be made in “12. **TIME PERIOD OF LICENCES FOR TOURISM UNITS**”
    - 2.8.1. **Addition:** A provision for **online licence renewal and monitoring** through the **Raj SSO Portal**, ensuring efficiency and ease of business.
    - 2.8.2. **Reason:** Simplified digital processes, already in place in other schemes, will reduce administrative hurdles and improve operational transparency
- 3. Saving Clause:** To safeguard the policy from being entirely invalidated due to potential flaws in specific sections.
- 3.1. Notwithstanding any provision in this Tourism Policy, all existing laws, regulations, and guidelines applicable to tourism and related activities in Rajasthan shall remain in full force and effect.
  - 3.2. This Policy is intended to complement and enhance the existing legal framework, without superseding any statutory requirements or obligations imposed by local, state, or national authorities.
  - 3.3. Any provisions of this Policy found to conflict with existing laws shall be deemed inapplicable, and the relevant legal statutes shall prevail. The Government of Rajasthan reserves the right to amend or revoke this Policy as necessary to align with evolving legal and regulatory standards.

By making these refinements, the draft can become more inclusive, sustainable, and aligned with Rajasthan's long-term goals of promoting tourism while preserving its cultural and environmental resources.

Consumer Unity & Trust Society (CUTS) expresses gratitude to the Department of Tourism, Government of Rajasthan for inviting comments on the Draft of Rajasthan Tourism Unit Policy 2024. CUTS looks forward to the Department of Tourism, Government of Rajasthan accepting the above suggestions and assisting in its efforts to empower stakeholders and ensure better Ease of Doing Business in the Tourism Sector.

For any clarifications/further details, please feel free to contact: Madhvendra Singh Panwar ([mdp@cuts.org](mailto:mdp@cuts.org)) or Tasmita Sengupta ([tse@cuts.org](mailto:tse@cuts.org)).