

Q#	URN	Q17 Are there any additional aspects which should be included in the GSTC-Industry Section B? If yes, please specify	Criteria	Resolved	Justification	Recommended change
Q17	19	Section B in my view has too much focus on community impact. What about working conditions more generally? There is no specific section on labour rights. I can see it's somehow included in this section...	A2	No change required	Working conditions are dealt with through B8 (Employee protection and wages), supported by B7 (Equal opportunity) and by A2 (Legal compliance).	
Q17	102	Bonded labour, modern slavery	A2	No change required	A2 Indicator A2.a requires compliance with all relevant legislation and regulations (including labor). Also addressed in B6 and B8.	
Q19	6	Section B should adopt a holistic approach vis-a-vis social and economic benefits so as all the parties participate and will enjoy together the booty.	B	No change required	The intention of the comment is unclear. GSTC-I adopts a holistic approach wherever appropriate and possible.	
Q19	125	Much of this criteria does not reflect the reality of the NZ legislative landscape. Employment and Equal opportunity law is at the forefront of operating within NZ. The criteria asks for specific attention to aspects of local community and issues that may arise in less developed environments. Someway of recognising NZ law would be appreciated.	B	No change required	Verification of conformity with B7 and B8 is required. In some countries this may be dealt with through reference to legislation. Criteria Application associated with GSTC-I allow for justification to be given if it is felt that circumstances do not require a specific criterion to be applied to a specific tourism product.	

Q16	96	In addition to the recommendations above, health services are provided in the form of trainings for awareness as well as health insurance as per the benchmark document. It should be understood and outlined in the benchmark that employer obligations and health services extend beyond occupational health and safety. Therefore, upon detailing medical benefits, it is also recommended that the “Occupational Health and Safety” section, recommended above, make clear that services are also available for health conditions (preventative and curative) beyond problems commonly associated with occupational health and safety. That is, the employer is responsible for the health care of its workers generally and not just in relation to what the employer might deem a work related accident or illness. We recommend that the benchmark include and detail healthcare services available for each female and male worker on-site, including peer health educators, onsite clinics, and any other medical services of the kind. We also recommend the benchmark outline available outside medical care such as mobile clinics, referral systems, cooperative agreements.	B8	Partially accepted	These requirements are too detailed and specific for the GSTC-I and are too onerous for many small tourism businesses. However, they do underline the importance of fully addressing employee health issues as appropriate and practical. The Indicators for Criterion B8 refer to health and these will be reviewed/strengthened.	Review indicators for Criterion B8 to strengthen reference to health
Q18	19	As mentioned above, I believe there should be an employment section (not necessarily referring to social benefits to the community but labour rights more generally); working hours, migrant workers, forced labour, age limits etc.	B	Partially accepted	Coverage of employment and labour issues in B8 (Employee protection and wages) should be reviewed.	Rename and revise D8, as follows: D8 Decent work. Labour rights are respected, a safe and secure working environment is provided and employees are paid at least a living wage. Employees are offered regular training, experience and opportunities for advancement."

Q19	50	The GSTC-Industry needs be more relevant to metro/urban context and/or developed destinations. For example there needs to be a way to express that if a business has a license to operate they are meeting minimum guidelines. If they are in an urban area then issues of indigenous rights is non-applicable etc.	B	No change required	Issues of application in urban areas can be addressed through 'Criteria Application', which allows for justification to be given if it is felt that circumstances do not require it to be applied. Indigenous rights may be an issue in some urban areas.	
Q17	26	equitable sharing of benefits of tourism	B	No change required	Desirable but can this be dealt with through GSTC-I Criteria? Section B in its entirety takes some steps towards this	
Q17	20	Accessibility for local community (special/discounted prices, open days in the case of activities and attractions);	B1	Partially accepted	Consider reference in guidance for B1 (Community support)	Consider reference in guidance for B1 (Community support)
Q17	20	Active participation in the sustainability of touristic destination	B	Accepted	New criterion to be added to Section A	Add new criterion: AX Destination engagement. The organisation is involved with sustainable tourism planning and management in the destination.
Q14	66	Sustainable supply chains, Collaboration with sustainable partners	B	No change required	This is addressed through B3 (Local purchasing) and B4 (Local entrepreneurs).	
Q14	124	Profit Sharing with local community	B	Rejected (with justification)	Profit sharing should not be considered as a requirement although it could be an example of best practice in certain circumstances	
Q14	124	dealing with Leakage	B	No change required	Section B (B2/B3/B4) takes steps towards dealing with leakage.	

Q17	11	Social development	B	No change required	Section B in its entirety deals with 'social..benefits'. B1 deals with community support,B7 with equal opportunities, B9 with community services, B10 with local livelihoods.	
Q19	38	Try to take companies to the next level including aspects related with the implementation of joint ventures between private and social stakeholders, private companies and protected areas, among others	B1	Partially accepted	Consider change to B1 to extend beyond community support to include engagement in joint ventures	Change B4 to: "The organization supports local entrepreneurs in the development and sale of sustainable products and services that are based on the area's nature, history and culture". Change B1 and B4 guidance to include reference to engagement in joint ventures.
Q14	53	Not only check Customer Satisfaction but also Local communities' satisfaction with tourism practices in their region	B	Rejected (with justification)	Important but should be dealt with at destination level. See GSTC-D B4 (Local community opinion)	
Q14	128	Employee's Health and Safety / CSR / Equality, no discrimination, handicap in job	B	Partially accepted	While equality and employee protection are covered respectively in B7 and B8, there is a need to review and strengthen both.	Revise wording for B7 and B8.
Q19	29	incorporation/collection of metrics	B	Rejected (with justification)	Where measurement is required, this is already stated in the relevant criterion. Introduction of specific quantified thresholds/targets would not be appropriate for GSTC-I as a global standard but use by individual schemes is not precluded.	
Q17	29	B1, B3, B5, B6, B7, B10	B	No change required	These criteria are already included	

Q18	29	(NOT) B2, B4, B8, B9	B	Rejected (with justification)	No justification given for exclusion	
Q14	60	labor happiness	B	Partially accepted	B8 deals with employee protection and wages. Guidance can be expanded to cover employee wellbeing more fully. B7 deals with equal opportunities.	Review and strengthen guidance for B7 and B8
Q19	135	There still remains a definition question regarding the meaning of "local" - which is very situational	B	Rejected (with justification)	Understood. Inappropriate for this to be defined by GSTC-I as it should be flexible to the context within which the standard is being used.	
Q17	24	food should be a separate topic	B	Rejected (with justification)	Inappropriate to treat food differently to the purchase of any other goods or services. Food is included among sustainable products in B4 (Local entrepreneurs).	
Q19	24	The place where taxes have to be paid on the "wins" should be the place where they are created	B	Rejected (with justification)	Outside the scope of GSTC-I Criteria	
Q14	18	Interaction and initiatives with local people	B	Partially accepted	This is addressed in B1 (Community support) and also to some extent in B4 (Local entrepreneurs). B5 (Code of conduct- community) specifically refers to the collaboration and consent of the affected community. Consider change to B1 to extend beyond community support to include engagement in joint ventures	Change B4 to: "The organization supports local entrepreneurs in the development and sale of sustainable products and services that are based on the area's nature, history and culture". Change B1 and B4 guidance to include reference to engagement in joint ventures.

Q14	64	Involvement of local community	B	No change required	Many of the GSTC-I are concerned with involvement of the local community. Addressed through guidance for A6.2 and within Sections B and C. Is this sufficient?	
Q14	91	links with local providers	B	No change required	This is addressed through B3 (Local purchasing) and B4 (Local entrepreneurs). B3 could be extended beyond local/fair trade to an ethical purchasing policy. There is an overlap with D1.1	
Q17	93	Encourage local ownership, economic democracy, employee unions, self-management, community-ownership, discourage tax-avoidance esp. for multinationals	B	Partially accepted	B4 encourages support for local entrepreneurs. Consider change to B1 to extend beyond community support to include engagement in joint ventures. Difficult for GSTC-I to address the remaining issues explicitly. Some of these points are more relevant to destinations GSTC-D.	Change B4 to: "The organization supports local entrepreneurs in the development and sale of sustainable products and services that are based on the area's nature, history and culture". Change B1 and B4 guidance to include reference to engagement in joint ventures.
Q17	43	the definition of "local" or "regional" needs some precision despite the apparent difficulties across geographical areas	B	Rejected (with justification)	Understood. Inappropriate for this to be precisely defined by GSTC-I. Definition of 'local' in glossary should allow flexibility according to the context within which the standard is being used.	Review definition of 'local' in glossary
Q17	15	Separate SOCIAL and ECONOMIC benefits into two different sections, to improve awareness on both impacts.	B	Rejected (with justification)	Would lead to considerable repetition.	
Q17	48	involvement of local communities in tourism development planning, since early stage	B	Rejected (with justification)	This is best dealt with at a destination level, through GSTC-D (A1)	

Q17	110	Community Satisfaction	B	Rejected (with justification)	Important but should be dealt with at destination level. See GSTC-D B4 (Local community opinion)	
Q14	39	Supply chain	B	No change required	This is addressed through B3 (Local purchasing) and B4 (Local entrepreneurs).	
Q24	147	D1.1 better in B	B	Partially accepted	Review title and wording of D1.1 to reduce or remove overlap with B3	D1.1 renamed and revised as follows: 'D1.1 Environmentally preferable purchasing. Purchasing policies favor environmentally sustainable products...
Q16	45	The host community	B	No change required	Section B in its entirety deals with the local community	
Q14	45	Host community satisfaction	B	Rejected (with justification)	Important but should be dealt with at destination level. See GSTC-D B4 (Local community opinion)	
Q19	105	The cultural aspects of the Criteria could be sensibly improved by being more specific.	B	Partially accepted	Section C in its entirety addresses cultural aspects. Review guidance for opportunities to be more specific.	Review Section C guidance for opportunities to be more specific about cultural aspects.
Q14	103	Investment in local capacity building in staffing;	B2	Partially accepted	Elaborate IN-B2.a to ensure covers both pre- and post-employment training for local residents	Elaborate IN-B2.a to ensure covers both pre- and post-employment training for local residents
Q14	103	employee satisfaction;	B	Partially accepted	B8 deals with employee protection and wages and guidance can be expanded to cover employee wellbeing more fully. B7 deals with equal opportunities.	Review and strengthen guidance for B7 and B8

Q17	59	Access to finance, capacity building	B	Partially accepted	This is essentially a matter for destinations (GSTC-D) but could relate to B1 (Community support), B2 (Local purchasing) and B4 (Local entrepreneurs).	Consider some change to B1, B2 and B4 guidance.
Q17	132	Please consider: equal treatment of local entrepreneurs; giving restrictions/guidelines for foreign investors (e.g. only to hire local employees or to pay tax for hospital/school...); respecting and valuing the local culture (especially in tourism)	B	No change required	These matters are addressed in B2 (Local employment); B4 (Local entrepreneurs); and B7 (Equal opportunity). Respecting and valuing the local culture is addressed through B5 (Code of conduct - community) as well as C1 (Code of behaviour -visits).	
Q19	95	B1. Strategic investment should be based on the results of a human & child rights impact assessment that identifies where the company is having or could have greatest positive impact on local communities. Investments should align with core business activities for greatest impact. For example, investing in quality childcare solutions for working parents (who often work long, irregular hours) to support children's early childhood development or working with local schools to develop vocational training programmes that help adolescents transition from education to work with the right skills and qualifications.	B1	Partially accepted	B1 guidance suggests that best practice is a programme developed in collaboration with community and could be elaborated to encourage a strategic approach.	Elaborate B1 guidance to encourage a strategic approach to community support.

ISWG	AR	"The organization actively supports initiatives for local infrastructure and social community development." Also BL, ER. AR See extended comment B1 + C3 +D3.4. SUGGEST THIS BE A BROAD HEADING WITH SUB HEADINGS RELEVANT TO OTHER SUGGESTED CONTRIBUTIONS. AN ORGANISATION MAY NOT BE ABLE TO SUPPORT COMMUNITY DEVELOPMENT (AS HERE), PLUS CONTRIBUTIONS FOR SITE PRESERVATION (SEE C3 – OR PERHAPS B1 AND C3 NEED TO BE COMBINED?) PLUS BIODIVERSITY PROTECTION (D3.4) – PROVIDE THESE AS OPTIONS. EXAMPLE INITIATIVES COULD INCLUDE among others education, training, health, and sanitation. The organization actively supports initiatives for local infrastructure and social community development AR EXAMPLE INITIATIVES COULD INCLUDE among others education, training, health, and sanitation.	B1	Partially accepted	Point understood, but these three criteria relate separately to the different sections of GSTC-I and should all be of concern and interest to businesses. The important issue of over-burdening businesses can be addressed through explicit cross reference between B1, C3 and D3.4 in their respective indicators/guidance.	Indicators/guidance for each of B1, C3 and D3.4 should include an acknowledgement that consideration should be given to the cumulative contribution required when all three criteria are taken into account, especially for smaller organisations. Reference could also be made to recognition of varying priorities according to local context.
ISWG	BL	Change 'Community support' to 'community engagement'	B1	Partially accepted	Elsewhere agreed to review B1 guidance to extend beyond community support to include engagement in joint ventures.	Review B1 guidance to encourage engagement in joint ventures.
Q17	101	Community health clinics and awareness programs on sustainable initiatives.	B1	No change required	This is covered in B1	

ISWG	ER	"The organization actively supports initiatives for local infrastructure and social community development." Current statement is vague as to whether education/training/health/sanitation ALL need to be supported, or whether those are options. If they are options, additional ones should be added.	B1	Accepted	They are intended to be options, and the wording should be amended to make this clear.	Amend wording of B1 Community support, as follows: The organisation actively supports initiatives for local infrastructure and social community development. Examples of initiatives include education, training, health and sanitation and projects which address the impacts of climate change."
Q17	38	Private - Public - Social Projects	B1	No change required	Covered in B1	
Q19	146	B1) Are local taxes used for supporting the community eligible?	B1	Rejected (with justification)	B1 Community support refers to 'actively' supporting initiatives and 'some form of contribution'. It is implied but not specified that this contribution is voluntary.	
Q17	119	Assist local community in reducing its environmental / climate change impacts	B1	Accepted	B1 Community support could include reference to initiatives to reduce environmental/climate change impacts	Amend wording of B1 Community support, as follows: The organisation actively supports initiatives for local infrastructure and social community development. Examples of initiatives include education, training, health and sanitation and projects which address the impacts of climate change."

Q19	119	Our industry should lead by example but also give direct assistance (advice or means) to local communities where we operate in diminishing impacts of climate change and impacts on the environment more generally. The health of our industry depends on slowing climate change. We need to lead effects on environmental protection, and we need to inspire the communities and regions where we operate to take action as well because it is so very much in their own best interest.	B1	Accepted	B1 Community support could include reference to initiatives to reduce environmental/climate change impacts. Add projects which address climate change impacts to list of example initiatives	Amend wording of B1 Community support, as follows: The organisation actively supports initiatives for local infrastructure and social community development. Examples of initiatives include education, training, health and sanitation and projects which address the impacts of climate change."
Q26	110	I suggest including criteria that recommend 1) providing support for destination stewardship councils / stakeholder advisory groups and 2) support for community-managed funds intended to benefit the destination.	B1	Partially accepted	Engagement with destination management structures will be added as a new criterion in section A. Community funds are a mechanism relevant to B1 but do not need to be specified as such.	Add new criterion: AX Destination engagement. The organisation is involved with sustainable tourism planning and management in the destination.
Q18	147	B1 should go in C	B1	Rejected (with justification)	Section B is focussed on social and economic benefits to the local community and B1 relates to community support. Section C focuses on cultural heritage.	
ISWG	AR	SUGGEST CREATING 2 SECTIONS – EMPLOYMENT IS DIFFERENT TO TRAINING. AR add: "...WHICH IS MEASURED. CORRECTIVE ACTION GUIDELINES ARE AVAILABLE".	B2	Partially accepted	Agree training is different from employment and should be covered in an expanded B8. The approach to measurement is general to many criteria and do not need to be separately addressed here.	Amend B2 to "Local residents are given opportunities for employment and advancement, including in management positions." Expand B8 to include training, amongst other changes required.

ISWG	BL	Split in two. Define local - how far? Has to be measured.	B2	Partially accepted	Agree training is different from employment and should covered in an expanded B8. Inappropriate for 'local' to be defined by GSTC-I as it should be flexible to the context within which the standard is being used.	Amend B2 to "Local residents are given opportunities for employment and advancement, including in management positions." Expand B8 to include training, amongst other changes required.
ISWG	IS	Splilt in two. This is already a criteria in A3 Guidance and training....	B2	Partially accepted	Agree training is different from employment and should covered in an expanded B8. A3 relates to guidance and training on the sustainability aspects of the business rather than training requirements in general.	Amend B2 to "Local residents are given opportunities for employment and advancement, including in management positions." Expand B8 to include training, amongst other changes required.
Q14	40	Human Resources - Local staffing policies	B2	No change required	This is addressed through B2 and B7	
Q17	112	With regards to 'local employment & entrepreneurs' - should be for local-born in the country peoples. Allowing foreign buyers to come in, hire only the 'token' few locals while bringing all their family members from other countries to work, does NOT sustain the local communities.	B2	No change required	This is addressed through B2 and B7. B2 refers specifically to including management positions.	
Q19	67	I find criteria B2 and B7 along with their corresponding indicators to be overlapping and repetitive. Maybe, they can be merged into one.	B2	Partially accepted	B2 is about a positive approach to providing opportunities for local employment, while B7 is concerned with equal opportunities. To avoid a perception of overlap, the word 'equal' should be removed from B2.	Amend B2 to "Local residents are given opportunities for employment and advancement, including management positions."

Q19	99	2 and 7 could get together	B2	Partially accepted	B2 is about a positive approach to providing opportunities for local employment, while B7 is concerned with equal opportunities. To avoid a perception of overlap, the word 'equal' should be removed from B2.	Amend B2 to "Local residents are given opportunities for employment and advancement, including management positions."
Q19	80	B.2: Subject to the candidate employees have the necessary qualifications or can easily obtain it.	B2	No change required	The criterion is about providing opportunities rather than individual circumstances.	
Q19	95	B3. Local suppliers must meet human & child rights/labour rights standards as well as quality/environmental criteria	B3	Partially accepted	Fair trade principles cover ethical purchasing including child labour and working conditions. Quality is an important consideration. Environmental criteria are covered under D1.1.	Revise wording of B3 Local purchasing, as follows: "When purchasing and offering goods and services, the organisation gives priority to local and fair trade suppliers where these are available and of sufficient quality"
ISWG	AR	COMBINE CURRENT B3 AND B4 AS THEY REFER TO THE SAME CONCEPTS.	B3	Rejected (with justification)	B4 relates to facilitating access between local entrepreneurs and customers, and also encouraging products that are based on the area's nature, history and culture.	
ISWG	ER	Suggest defining "local" and "fair-trade purposes".	B3	Partially accepted	Inappropriate for this to be precisely defined by GSTC-I. Definition of 'local' in glossary should allow flexibility according to the context within which the standard is being used. Reference could be made to 'The Key Principles of Fair Trade' as understood by the World Fair Trade Organisation.	Review definition of 'local' in glossary

Q19	120	Providers are from the region ou country Customers are from the region ou country Cooperation with other companies Cooperation with Universities	B3	Partially accepted	Section B of GST-I is generally addressing local communities as a priority. The definition of local in the glossary could refer to a hierarchy.	Review definition of 'local' in glossary, including reference to hierarchy.
Q17	87	Local suppliers	B3	No change required	This is covered in B3 (local purchasing)	
ISWG	KSB	THIS MAY ADDRESS FOOD IF WE WERE MORE EXPLICIT OR ADD A FOOD LEVEL ITEM	B3	Rejected (with justification)	Food is generally understood as a key part of all tourism purchases and does not need to be spelt out	
Q17	32	Local Prodcuts Certification Schemes	B3	Rejected (with justification)	These are not widely available and it would not be practicable to introduce them as a requirement	
Q19	116	B3-B9-B10 and probably others could benefit by being grouped under a Sustainable Operations criterion	B3	Rejected (with justification)	Most of the critera are about sustianble operations and this would not work as a differentiated group heading	
Q19	45	The generation of local productive chains to provide the industry should be encouraged in order to contribute to local sustainable development.	B3	Partially accepted	This goes beyond B3 to encourage generation as well as use of supply chains. This could be included as best practice guidance.	Consider adding support for supply chain development to B3 guidance.
Q14	103	local farm to restaurant - agricultural sourcing sustainability	B3	No change required	Is covered in B3	
ISWG	AR	REMOVE SPECIFICITY – THESE ARE GUIDELINES, WHICH CAN BE INTERPRETED AT THE LOCAL LEVEL	B4	Accepted		Revise B4 Local entrepreneurs as follows: Remove "(including food and beverages, crafts, performance arts, agricultural products etc)"

ISWG	BL	REMOVE SPECIFICITY – THESE ARE GUIDELINES, WHICH CAN BE INTERPRETED AT THE LOCAL LEVEL	B4	Accepted		Revise B4 Local entrepreneurs as follows: Remove "(including food and beverages, crafts, performance arts, agricultural products etc)"
ISWG	ER	Suggests replacing 'including...' with '(such as food and beverages, crafts, performance arts, excursions, agricultural products, etc.)';	B4	Partially accepted	Following other comments list is to be removed anyway	Revise B4 Local entrepreneurs as follows: Remove "(including food and beverages, crafts, performance arts, agricultural products etc)"
ISWG	IS	REMOVE SPECIFICITY – THESE ARE GUIDELINES, WHICH CAN BE INTERPRETED AT THE LOCAL LEVEL. Add 'AND SERVICES' after products; if examples some more should be included, as eg "guiding, musicians" etc.);	B4	Accepted	Add 'and services' after products	Revise wording of B4 as follows: B4 Local entrepreneurs. The organisation supports local entrepreneurs in the development and sale of sustainable products and services that are based on the area's nature, history and culture.
ISWG	KSB	MAY BE MOST APPROPRIATE FOR BUSINESSES WITH RETAIL OUTLET CAPABILITIES; NOT SURE THIS APPLIES ACROSS THE BOARD, AND IF A LOCAL OWNER WISHES TO EXPAND THEIR OWN BUSINESS OFFERING THESE KINDS OF SERVICES THEY SHOULD DO SO...	B4	Rejected (with justification)	Possibly, but supply and selling opportunities need to be generally available to local businesses	
Q19	80	B.4: We support, but in consideration to the business concept of the establishment.	B4	Rejected (with justification)	Possibly, but supply and selling opportunities need to be generally available to local businesses	

Q19	65	<ul style="list-style-type: none"> IN-B4a Guidance: The level of local entrepreneur's access should be commensurate with the organization's tourism business turnover relative to the economic status of the local community..." even with the example this is a confusing statement to me. 	B4	Accepted	Guidance is confusing and should be revised	Revise B4 guidance.
Q19	65	<ul style="list-style-type: none"> B4: I agree with this concept but believe we should strengthen it. My personal experience has been that in some countries no one exploits the local indigenous communities worse than the locals themselves. For example, there are local businesses in Peru that place a 400% markup on local handicrafts, totally exploiting the indigenous quechua-speaking communities that actually create the handicrafts. It would be nice if this criteria could address this. 	B4	Partially accepted	It is important that any selling takes place on fair terms	Revise B4 guidance
ISWG	AR	Suggests combine with C1.	B5	Accepted	It is agreed that there is overlap with CI as currently worded. Rename and reword C1, incorporating elements of B5.	New title and wording for C1, as follows: C1 Cultural interactions. The organisation follows locally agreed guidelines for the management and promotion of visits to indigenous communities and culturally or historically sensitive sites in order to minimise adverse impacts and maximise local benefits and visitor fulfilment.

Q18	31	Code of Conducts for communities should change to Responsible Guidelines for Communities	B5	Partially accepted	Remove reference to 'Code of Conduct'.	Rename and reword C1, incorporating elements of B5. New title and wording for C1, as follows: C1 Cultural interactions. The organisation follows locally agreed guidelines for the management and promotion of visits to indigenous communities and culturally or historically sensitive sites in order to minimise adverse impacts and maximise local benefits and visitor fulfilment.
Q19	31	Just the negative language of using Codes of Conduct	B5	Accepted	Remove reference to 'Code of Conduct'.	Rename and reword C1, incorporating elements of B5. New title and wording for C1, as follows: C1 Cultural interactions. The organisation follows locally agreed guidelines for the management and promotion of visits to indigenous communities and culturally or historically sensitive sites in order to minimise adverse impacts and maximise local benefits and visitor fulfilment.
Q19	124	Will B5 address the CODE from ECPAT? industry work against Sexual Exploitation of Minors (sex tourism?)	B5	No change required	This issue is addressed through B6	
Q19	146	B5) to consult and seek consent of the local community might be difficult in big cities or if there is no interest of the community...	B5	No change required		

Q20	126	guide training	B5	No change required	Indicator B5.a refers to documented code of conduct including....staff induction and training materials.	Review Indicator B5.a for relevance to new criteria combining B5 with C1.
Q19	60	Review Criteria Larrakia	B5	Rejected (with justification)	Larrakia is understood but the criteria referred to could not be identified	
Q20	130	Demonstrate awareness of minimum impact codes by guide / briefing on local cultures	B5	No change required	Indicator B5.a refers to documented code of conduct including....staff induction and training materials.	Review Indicator B5.a for relevance to new criteria combining B5 with C1.
Q19	80	B.5: Could also include code of conduct for activities in nature.	B5	Partially accepted	There is no code for activities in the natural environment, although A8 (Information and interpretation) does refer to 'explaining appropriate behaviour while visiting natural areas' as well as living cultures and cultural heritage sites. Consider additional criterion in Section D	Add new criterion: "D3.X Visits to natural sites. The organisation follows appropriate guidelines for the management and promotion of visits to natural sites in order to minimise adverse impacts and maximise visitor fulfilment."
Q18	147	B5 should go in C	B5	Rejected (with justification)	It is agreed that there is overlap with C1 as currently worded. Rename and reword C1, incorporating elements of B5.	Rename and reword C1, incorporating elements of B5. New title and wording for C1, as follows: C1 Cultural interactions. The organisation follows locally agreed guidelines for the management and promotion of visits to indigenous communities and culturally or historically sensitive sites in order to minimise adverse impacts and maximise local benefits and visitor fulfilment.

Q19	65	<ul style="list-style-type: none"> • B5: It would be nice if the criteria could specify the key elements the Code of Conduct should include. 	B5	Rejected (with justification)	Guidance needs to be developed at a local level.	
Q19	95	B6. Awareness-raising efforts should involve local providers that have a link to the company i.e. taxi drivers as well as tourists	B6	No change required	Specific reference is made, through a footnote, to using The Code as a means of verification for this criterion. This situation is covered by one of The Code's six principles: supporting, collaborating and engaging stakeholders.	
ISWG	ER	Suggested edited criterion: replace "..and harassment.." with "..or harassment";	B6	Accepted		Replace 'and' with 'or' in B6 criterion text but not in title.
Q19	11	B6: Regarding my experience, can be address specifics points regarding or criteria regarding accommodations for staff when a company provide this to employees.	B6	Rejected (with justification)	This is covered by B6	
Q19	142	Section B6 could also make reference to the prevention of human trafficking for exploitation purposes.	B6	Rejected (with justification)	Human trafficking would be expected to fall within exploitation and further reference is unnecessary	
Q17	126	Child Safe trainings, School/orphanage/children centers visits & short term volunteerism by non specialist with children to be forbidden, guides training on sustainability usually guides are free lance and are key mediators	B6	Partially accepted	Guidance for B6 (Exploitation and harassment) requires larger organisations to have a documented policy and associated staff awareness and reporting systems. B5 (Code of conduct - community) (now incorporated in C1) makes no specific reference to children involved with community activities. Ensure that due reference is made in the appropriate guidance.	Review guidance re children in revised C1 (Cultural interaction).

Q17	142	Prevention of modern slavery - including forced or bonded labour, human trafficking, slavery in supply chains and child labour should be explicitly addressed in its own section.	B6	No change required	These issues are covered by B6 (Exploitation and harassment).	
ISWG	IS	B6 and B7 could be put together to one criteria under "Code of ethics" referring to a policy avoiding exploitation and harassment, - and stimulating equal opportunities?;	B6	Rejected (with justification)	These two issues are sufficiently different and significant so as to require two separate criteria	
Q19	126	Children protection; interaction between foreign adults and local children is detrimental to children proper education and emotional balance as people come and go creating and destroying bonds upon departure with vulnerable kids . The travel industry should be more responsible in this area: children are not tourist attractions, and good intentions do not excuse these, one who wishes to help can do so by supporting local organizations working with children. Such visits also make it easier then once children trust tourists as good people for ill intentioned persons (paedophile) to groom them for their own convenience (paedophilia, children exploitation) , then it fosters the creation of children centers for business purpose where children misery becomes a commercial asset, an attraction to show, pity	B6	No change required	The importance of this issue is fully recognised. However, it would be addressed within requirements of B5 (Code of conduct - community) and B6 (Exploitation and harassment).	
Q17	10	Child protection , misconduct	B6	No change required	These issues are covered by B6 (exploitation and harassment). Misconduct would be addressed by Indicator B6.a which requires that a documented policy is made known to all staff and management.	

Q26	94	In addition to some of the human rights related suggestions earlier, child labour, sexual exploitation, young workers, child safeguarding facilities and conduct of staff are missing or insufficiently addressed in current GSTC.	B6	No change required	These issues are covered by B6 (Exploitation and harassment). Reference should be made to child labour in B6 rather than in B7, through additional indicator B6.b. Misconduct would be addressed by Indicator B6.a which requires that a documented policy is made known to all staff and management.	Move part of IN-B7.a to become new IN-B6.b
Q19	95	B7. Other groups that are at higher risk of discrimination include young people, working parents and pregnant women. Companies should undertake a human rights impact assessment that considers the rights of vulnerable groups, including children, to help identify employment practices that are having a negative impact on their lives.	B7	Rejected (with justification)	It is not feasible to list all groups at risk of discrimination in the text of the criterion. This could be reflected in guidance.	Revise B7 wording, as follows: "B7 Equal opportunity. The organisation offers employment opportunities, including in management positions, without discrimination by gender, race, disability or in other ways."
ISWG	AR	AR AGREE WITH BL – COMBINE WITH B2; AR AGREE WITH ER, ASPECTS ALSO COVERED IN B5 AND B6;	B7	Partially accepted	B2 is about a positive approach to providing opportunities for local employment, while B7 is concerned with equal opportunities. To avoid a perception of overlap, the word 'equal' should be removed from B2. B5 and B6 are covering rather different issues.	Revise B2 wording, as follows: "Local residents are given opportunities for employment and advancement, including management positions."

Q19	96	<p>We recommend using wording such as the following that is more commonly used and understood by a larger body: “no discrimination on the basis of race, color, gender, sexual orientation, pregnancy, disability, HIV status, marital status, age, religion...”</p> <p>The term “minorities” is vague and may/may not include certain groups and their rights. We recommend listing as many individual groups as possible. We also recommend the document outline what the policy indicates to make clear what the disciplinary actions against discrimination outlined in your policies are. We'd suggest looking at CEDAW (2008*in its current format) The Committee on the Elimination of Discrimination against Women (CEDAW) is the OHCHR body of independent experts that monitors implementation of the Convention on the Elimination of All Forms of Discrimination against Women. *Before 2008, CEDAW stood for The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). It was adopted in 1979 by the UN General Assembly and often described as an international bill of rights for women. Consisting of a preamble and 30 articles, it defined what constitutes discrimination against women and set up an agenda for national action to end such discrimination.</p>	Partially accepted	<p>Accept criticism of the current wording and suggest that B7 is reworded. However, it is not feasible to list all groups at risk of discrimination in the text of the criterion. This could be reflected in guidance.</p>	<p>The organisation offers employment opportunities, including in management positions, without discrimination by gender, race, disability or in other ways.</p>
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Q19	96	The document discusses child labor and overtime hours with reference to the ILO in Section B, indicators B7-A and B8-C, but does not detail which conventions these references are referring to. We recommend a detailed reference to ILO conventions that include the convention(s) number, a description of the convention verbatim, as per ILO, and how the convention ties to the criteria. Additionally, we feel that there could be more references to ILO conventions beyond these two.	B7	Partially accepted	Include footnote referring to ILO Fundamental Principles and Rights at Work. These relate to B6, B7 and B8 and are dealt with under B8.	
ISWG	BL	BL SHALL WE LINK IT TO THE B2? MAYBE EQUAL OPPORTUNITY, THEN ONE FOR MINORITIES, OTHER FOR LOCAL PEOPLE, ALL UNDER EQUAL OPPORTUNITY;	B7	Partially accepted	B2 is about a positive approach to providing opportunities for local employment, while B7 is concerned with equal opportunities. To avoid a perception of overlap, the word 'equal' should be removed from B2. B5 and B6 are covering rather different issues.	
Q17	123	Equal opportunity can be expanded to include gender expression and sexual preference	B7	Rejected (with justification)	It is not feasible to list all groups at risk of discrimination in the text of the criterion. This could be reflected in guidance.	Consider inclusion in guidance of list of groups at risk of discrimination
ISWG	ER	Suggest remove criterion. It is encompassed in B2, B5, and B6;	B7	Rejected (with justification)	B2 is about a positive approach to providing opportunities for local employment, while B7 is concerned with equal opportunities. To avoid a perception of overlap, the word 'equal' should be removed from B2. B5 and B6 are covering rather different issues.	

Q17	25	Accessibility for persons with a disability	B7	Accepted	Reword criterion to include reference to disability	The organisation offers employment opportunities, including in management positions, without discrimination by gender, race, disability or in other ways.
Q14	5	Gender equity	B7	Accepted	Reword criterion to include reference to gender	The organisation offers employment opportunities, including in management positions, without discrimination by gender, race, disability or in other ways.
Q18	128	B7 could be in section A	B7	Rejected (with justification)	B7 is appropriately located	
Q19	128	B7 could be in section A	B7	Rejected (with justification)	B7 is appropriately located	
Q19	67	I find criteria B2 and B7 along with their corresponding indicators to be overlapping and repetitive. Maybe, they can be merged into one.	B7	Partially accepted	B2 is about a positive approach to providing opportunities for local employment, while B7 is concerned with equal opportunities. To avoid a perception of overlap, the word 'equal' should be removed from B2.	Amend B2 to "Local residents are given opportunities for employment and advancement, including management positions."
Q19	99	2 and 7 could get together	B7	Partially accepted	B2 is about a positive approach to providing opportunities for local employment, while B7 is concerned with equal opportunities. To avoid a perception of overlap, the word 'equal' should be removed from B2.	Amend B2 to "Local residents are given opportunities for employment and advancement, including management positions."

Q19	95	B8. How companies treat their workers should be a priority here - specific reference to the ILO core conventions should be made here. Indicator B8a. Asking companies to pay the national minimum wage is at odds with the criteria (there isn't an international regulation that deals with the level of wages...). The guidance should include a recommendation to work with local unions and the government to understand wage gaps and benchmarks with a view to incrementally increasing income so that it meets basic needs of individuals and families.	B8	Partially accepted	Include footnote referring to ILO Fundamental Principles and Rights at Work. These relate to B6, B7 and B8.	Include footnote referring to ILO Fundamental Principles and Rights at Work.
Q14	96	We recommend looking at WHO's Healthy Workplace Framework and Model - This model offers a management approach to companies for addressing comprehensively the overall health needs of their workers beyond just the potential occupational health hazards and impacts of environmental damages or dust/chemicals. Employers should ensure that workers (and, ideally, their families) have timely access to services, whether they are provided at the workplace, via mobile service providers, and/or through facilitated, convenient access to local community health resources.	B8	Rejected (with justification)	Desirable but these requirements go further than may be appropriate.	

Q17	96	A We recommend that medical staff should be trained	B8	Rejected (with justificatio n)	Desirable but these requirements go further than may be appropriate.	
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Q17	138	Sustainable employment/ decent work	B8	Partially accepted	The concept of decent work forms part of the Sustainable Development Goals and provides appropriate terminology and associated content for this criterion,	Revise B8, as follows: "B8 Decent work. Labour rights are protected, a safe and secure working environment is provided and employees are paid at least a living wage. Employees are offered regular training and opportunities for advancement."
Q17	113	Health and safety	B8	Accepted	This is covered through new wording for B8.	Revise B8, as follows: "B8 Decent work. Labour rights are protected, a safe and secure working environment is provided and employees are paid at least a living wage. Employees are offered regular training and opportunities for advancement."
Q19	113	B8Health insurance or the equivalent is provided to all employees. This is not possible in all countries	B8	No change required	As an aspiration, it is not inappropriate for this to be included in the guidance. It is not a requirement of the criterion.	
ISWG	ER	Suggest defining a living wage and referencing which international regulations would supersede national ones whenever higher.	B8	Partially accepted	Living wage' is defined in the glossary. Current debate about global application implies lack of agreement on a single definition. Agreed that some guidance on this would be desirable. Reference to international and national regulations have been removed from the criterion.	Revise B8, as follows: "B8 Decent work. Labour rights are protected, a safe and secure working environment is provided and employees are paid at least a living wage. Employees are offered regular training and opportunities for advancement." Review definition of 'living wage'.
Q18	128	B8 could be in section A	B8	Rejected (with justification)	B8 is more appropriately located in B	

Q19	128	B8 could be in section A	B8	Rejected (with justification)	B8 is more appropriately located in B	
Q19	65	<ul style="list-style-type: none"> IN-B8f: Could the equivalent of Workman's Comp be included? 	B8	Rejected (with justification)	This recommendation is too specific and not broadly applicable	
Q19	95	B9. Cumulative impact of all tourism on local community services can only be fairly assessed by engaging with affected or potentially affected communities.	B9	Partially accepted	This may be best addressed at a destination level but best practice would require that it is taken into account by an individual enterprise.	
ISWG	BenLep	(in other column) Criteria not clear to me. Criteria confusing to me..."No reduction in availability of water, WASTE?!"	B9	No change required	This is about the organisation placing demands undue demands on resources which would normally be available to provide basic services for the community. Waste could be considered within sanitation.	
Q19	99	9 and 10 could get together	B9	Rejected (with justification)	Possibility of combining B9 and B10 is understood. However, on balance, the distinction between community services and local livelihoods should be maintained.	
Q19	116	B3-B9-B10 and probably others could benefit by being grouped under a Sustainable Operations criterion	B9	Rejected (with justification)	Possibility of combining B9 and B10 is understood. However, on balance, the distinction between community services and local livelihoods should be maintained.	
Q18	147	B9 should go in C	B9	Rejected (with justification)	Section C relates specifically to cultural heritage rather than social benefits to the community.	

Q19	65	• IN-B9: The wording is unclear - what is the desired goal? No changes? reduction in changes? Suggest "No increase" or "No reduction" to parallel other indicators.	B9	Accepted	This could be clarified.	Review IN-B9 to clarify desired goal
Q16	142	Under B10 Local livelihoods - access to educational facilities should be included here.	B10	Rejected (with justification)	Not clear how this would be adversely affected by tourism actively	
Q18	147	B10 should go in C	B10	Rejected (with justification)	Section C relates specifically to cultural heritage rather than access to local livelihoods.	
Q19	65	• B10: This is an excellent addition from the previous version.	B10	No change required	Appreciated	
ISWG	BenLe p	The principal rationale behind is great but I think that the application is much more complicated, especially to show evidence of compliance	B10	No change required	The challenge is understood.	
Q17	129	I did participate as President of IH&RA		No change required		
Q18	118	Only because some can be extremely challenging, if not impossible. For e.g., we operate in the mountains of British Columbia, largely in the winter. Local purchasing is next to impossible.		No change required	It is accepted that local conditions may make it impossible to meet certain criteria.	
Q17	120	Contribution of industry to the region's economy (% GDP);		No change required	This is more appropriate to GSTC-D where it is dealt with as B1 (Economic monitoring)	
Q17	130	Volunteer experience for sustainability student		No change required	Desirable and not excluded by these criteria but too specific to include	