

Q#	URN	Q23 Are there any additional aspects which should be included in the GSTC-Industry Section D?	Criteria	Resolved	Justification	Recommended change
Q25	23	D3 should include a sub-aspect asking the company to provide a space for biodiversity education, explaining what the native and endemic flora and fauna are.	D	No change required	A8 refers to providing customers with information about and interpretation of 'natural..environment' and 'natural surroundings'	
Q23	52	Interpretation of Flora and Fauna, Climate Change	D	No change required	A8 refers to providing customers with information about and interpretation of 'natural..environment' and 'natural surroundings'	
Q23	31	Intpretation and Guiding	D	No change required	A8 refers to providing customers with information about and interpretation of 'natural..environment' and 'natural surroundings'.	
Q23	113	communication to guests. Its should be mandatory for organisations to communicate about their program to guests	D	Accepted	Address through new criterion in Section A concerning communication	Add new criterion AX: Reporting and communication. The organisation communicates its sustainability policy, actions and performance to stakeholders, including customers, and seeks to engage their support.
Q23	26	About biodiversity recuperation directly by tourism	D	No change required	D3.4 deals with the organisation's support for and contribution to biodiversity conservation.	

Q25	17	aspects related to active participation in key sector support programs and decision making boards (environmental protection and conservation specific, affecting destination development, professional qualification, entrepreneurship, innovation, quality, education, good practice promotion and its integration in the tourism sector, etc.), private, public or mixed, could be addressed here. . History and evolution of sector/ business response to referenced criteria could be addressed here.	D	Partially accepted	Consider new criterion in Section A requiring engagement with sustainable tourism planning and management in the destination, where this exists	Add new criterion: AX Destination engagement. The organisation is involved with sustainable tourism planning and management in the destination.
Q23	53	Include Leave No Trace principles	D	Partially accepted	Visitor behaviour in natural sites is partly covered in A8 (Information and interpretation) and may possibly be strengthened through a new criterion in D3.	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."
Q23	5	The educational element	D	No change required	This is addressed in various places	
Q23	102	Impact assessment	D	No change required	Reference is made to impact assessment in A6.2 (Respect heritage). Addressing and measuring impacts is referred to in various criteria within Section D	
Q25	29	For any of this to make sense to owners of companies that are on the fence about becoming sustainable and are looking to industry leaders for guidance, we should encourage the collection of metrics	D	Accepted	Certain criteria in Section D require that performance is measured. There may be scope for this to be applied to additional criteria.	Review Section D criteria for additional opportunities to incorporate measurement.

Q23	132	consider a synergy of local economy/people's life and nature protection, e.g. training people to use sustainable agriculture/forestry...	D	No change required	These inter-relationships are reflected in the Criteria	
Q23	78	Make conferences and courses about all this aspects to the costumers, make them consiencious about all of this	D	Partially accepted	While a requirement to run courses and conferences for visitors would be inappropriate, this will be partly addressed through a new criterion in Section A covering communication	Add new criterion AX: Reporting and communication. The organisation communicates its sustainability policy, actions and performance to stakeholders, including customers, and seeks to engage their support.
Q23	91	environmental education	D	Partially accepted	While this is reflected in various aspects of the Criteria, it will be helped by a new criterion in Section A concerning communication of sustainability actions. May possibly be strengthened through a new criterion in D3	Add new criterion AX: Reporting and communication. The organisation communicates its sustainability policy, actions and performance to stakeholders, including customers, and seeks to engage their support. 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."
Q23	112	All entities need to find ways to 'recycle' to help the local communities. I.E., ways to reuse plastics to use in flooring, etc.	D	Partially accepted	This positive suggestion is broadly covered in D1.1 (Local purchasing) although can be strengthened in guidance.	Guidance to encourage sourcing of locally recycled materials

Q23	144	Additionally, in line with a separate section on biodiversity conservation, to also include an additional section D4, covering animal welfare. Over the past years a growing group of tour operators have adopted animal welfare policies, and travel industry associations, like ABTA and ANVR have set welfare guideline for animals in tourism. It is logical that GSTC further embeds welfare criteria as separate criteria, in line with already existing guidelines.	D	Rejected (with justification)	While recognising the importance of animal welfare, it is recommended that these concerns are addressed through amendments to D3.2 and D3.5.	
Q25	144	1. Change title of Section D to “Maximize benefits to the environment and wildlife and minimize negative impacts” to recognise the role of and implications to wild animals in the environment, but also those taken from natural habitats, or bred in captivity, to be used in attractions, excursions and events that are promoted to tourists.	D	Rejected (with justification)	Section D covers a whole range of important issues to do with the environment, of which wildlife is just one. Individual criteria in D.3 cover wildlife where appropriate	
Q23	48	contribution (beside financial one) of visitors to nature conservation	D	Partially accepted	C1 (Code of behaviour - visits) is focussed on culturally or historical sensitive sites, as is C3 (Site protection and access). There is no directly comparable criterion for natural areas. D3.4 (Biodiversity conservation) is about the organisation's support for and contribution to biodiversity conservation, but makes no reference to visitor involvement.	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."

Q16	67	Criterion A8 seems to me very relevant to criteria C1, C3 and C4 of Section C about cultural heritage. In my opinion, as it is now, it creates a repetition and might link better if incorporated in the latter Section. However, a criterion providing "Information about and interpretation of the natural surroundings, as well as explaining appropriate behaviour while visiting natural areas" would need to be added in Section D also.	D	Partially accepted	C1 (Code of behaviour - visits) is focussed on culturally or historical sensitive sites, as is C3 (Site protection and access). There is no directly comparable criterion for natural areas. D3.4 (Biodiversity conservation) is about the organisation's support for and contribution to biodiversity conservation, but makes no reference to visitor involvement.	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."
Q25	99	together C & D.	D	Rejected (with justification)	This has been given careful consideration. It is important that GSTC-I maintains a clear line between cultural heritage and the environment.	
Q25	65	• Overall it would be nice to separate out hotels from tour operators, particularly with Section D criteria. While the criteria are valid for both, I believe the indicators/guidance would look different for each group.	D	Partially accepted	Agreed should review this when dealing with indicators.	Review separation of Hotels and Tour Operators when dealing with the indicators.
Q23	94	Same as 17 re: stronger requirements than "minimize negative impacts".	D	Rejected (with justification)	Throughout GSTC-I and GSTC-D, the prevailing language is to minimise (negative or adverse) impacts.	
Q23	59	Innovation in alternative energy/water management/waste management, sustainable infrastructure and materials, sustainable funding sources,	D	Accepted	Innovative solutions are not precluded and should perhaps be encouraged, maybe through guidance	Strengthen reference to innovation in guidance for D1.3, D1.4, D2.1, D2.5
Q23	142	Under "Conserving resources", you could add a sub-section to relate to the sustainable use of food.	D1	Partially accepted	This can be addressed through D1.1 guidance which can encourage planning food ordering and storage such as to minimise waste.	Add to D1.1 guidance. Best practice is to plan the ordering and storage of food in order to minimise waste.

Q25	142	You might want to consider renaming the "Consuming resources" section "Sustainable production and consumption of resources", so that tourism enterprises are encouraged to focus on the way their product is both designed and delivered.	D1	Rejected (with justification)	While a change to 'Responsible Consumption and Production' would reflect SDG12, 'Conserving resources' reflects the goal for D1 and mirrors the style of titles for D2 and D3	
Q25	77	Generally, incentives are missing to continuously minimize pollution/consumption e.g. benchmark in the first year, afterwards minimizing pollution/consumption year after year (D1.3 Energy; D1.4 Water; D2.2 Transport greenhouse gas emissions; D2.4 Waste etc.) Guidance should include scientific based performance metrics which are measurable and auditable (e.g. Maximum of total volume of water in kiloliters consumed per source per specific tourist activity per guest)	D1	Partially accepted	Certain criteria in Section D require that performance is measured. There may be scope for this to be applied to additional criteria.	Review Section D criteria for additional opportunities to incorporate measurement.
ISWG	AR	SUGGEST THIS MOVES TO B.3.2;	D1.1	Rejected (with justification)	Clarify the distinction between D1.1 and B3 through rewording D1.1.	Rename D1.1 as 'Environmentally Preferable Purchasing'.
Q23	34	An Environmentally Preferable Purchasing Policy (EPPP)	D1.1	Accepted		Rename D1.1 as 'Environmentally Preferable Purchasing'.
Q25	34	An EPPP should cover in general : Purchases contain materials from forests certified to standards such as (PEFC) or (FSC). Purchases are sourced from suppliers that use renewable energy. Tissue and paper purchases specify unbleached or Totally Chlorine Free (TCF), Process Chlorine Free (PCF), Enhanced Elemental Chlorine Free (EECF) or Elemental Chlorine Free (ECF). Paints, carpeting, adhesives, furniture, and similar purchases specify low volatile organic compounds (VOC) content, low or no formaldehyde.	D1.1	Partially accepted	This is too much detail but the broad principles can be reflected in Guidance	Summarise in Guidance in D1.1

ISWG	BenLe p	SUSTAINABILITY OF FOOD A Sustainable Food Purchasing Policy is developed and respected at all time.	D1.1	Partially accepted	This can be addressed through guidance for D1.1 and D1.2 which can encourage planning food ordering and storage such as to minimise waste.	Review D1.1 and D1.2 guidance
Q23	66	Regional sustainable (biological) food,	D1.1	Partially accepted	This can be addressed through guidance for D1.1 and D1.2 which can encourage planning food ordering and storage such as to minimise waste.	Review D1.1 and D1.2 guidance
Q25	128	Improve in first : the reduced requirements and sobriety.	D1.1	Partially accepted	This can be addressed through guidance for D1.1 and D1.2 which can encourage planning food ordering and storage such as to minimise waste.	Review D1.1 and D1.2 guidance
ISWG	JK	Can this combined with criteria B3?; IS Shouldn't local purchasing also include services (as using local guides etc);	D1.1	Partially accepted	B3 deals with selection of goods and services that support the local economy. D1.1 deals with the selection of products based on minimising their environmental impact.	Rename D1.1 as 'Environmentally Preferable Purchasing'.
Q25	77	D1.1 Local purchasing -IN-D1.1.a.-....consumables clearly favors local and/or ecologically sustainable products. / Please delete "or". Unsustainable local products must definitely be avoided.	D1.1	Accepted		Reword D1.1 as follows: D1.1 Environmentally preferable purchasing. Purchasing policies favor environmentally sustainable products, including capital goods, food, beverages, building materials and consumables.
Q23	137	Certified sustainable purchasing: Engagement with and/or choice for certified tourism products/suppliers (e.g. hotel, guide, transport etc.)	D1.1	Partially accepted	Sustainability certification has limited coverage but can be used to aid purchasing decisions	Guidance to include use of certification to identify sustainable purchases

Q25	137	D.1.1. Add: No use or selling of any genetically modified products.	D1.1	Rejected (with justification)	Not appropriate to single out specific types of product. GM issues are subject of debate.	
Q25	135	The definition of "local" can vary greatly ; e.g from Nevis (which might or might not also refer to St.Kitts) to a place like Yellowknife (which might or might not also refer to Canada..or). Needs to be considered if it is to be a criterion. No food is grown in Yellowknife, only occasionally hunted..	D1.1	Partially accepted	Accept that concept of local and practicability will vary according to context	Review definition of 'local' in glossary to include concept of gradation by distance
Q23	24	food	D1.1	No change required	Is referred to in D1.1	
Q23	130	Ethical , fair trade purchasing	D1.1	No change required	Covered in B3	
Q17	32	Local Prodcuts Certification Schemes	D1.1	Partially accepted	Sustainability certification has limited coverage but can be used to aid purchasing decisions	Guidance to include use of certification to identify sustainable purchases
Q24	147	D1.1 better in B	D1.1	Rejected (with justification)	B covers social and economic impact of purchasing while D1.1 covers environmental impact of purchasing. Accept that this could be clearer in the wording.	Rename D1.1 as 'Environmentally Preferable Purchasing'.
Q23	45	Fair trade	D1.1	No change required	Covered in B3	
Q25	45	Give more importance to local consumption and fair trade	D1.1	No change required	Covered in B3	

ISWG	AR	The purchase and use of disposable and consumable goods is measured (WHERE POSSIBLE); AGREED WITH ER: "THE organization actively seeks ways to reduce their use" NEEDS TO BE SEPARATED OUT;	D1.2	Accepted	Agree that measurement is a challenge for some small businesses and that the emphasis should be on reducing use not on the emasurement process.	Take measurement out of criteria and put into indicators or guidance. Reword criterion D1.2 as follows: "D1.2 Consumable goods. The organisation actively seeks to reduce the purchase and use of disposable, consumable and perishible goods, including food."
ISWG	BL	MEASURING DISPOSABLE AND CONSUMABLE GOODS IS A MASIVE TASK FOR SMALL PROPERTIES WITH NO RESOURCES;	D1.2	Accepted	Measurement is a challenge for some small businesses and emphasis should be on reducing use not on the emasurement process.	Take measurement out of criteria and put into indicators or guidance. Reword criterion D1.2 as follows: "D1.2 Consumable goods. The organisation actively seeks to reduce the purchase and use of disposable, consumable and perishible goods, including food."
ISWG	ER	Criteria and the indicator are covering several different topics each with different managerial approach. Suggest reworking this criteria, separating out or clearly defining what the purpose is within the criteria, which appears to involve 1)reducing disposables 2)reducing packaging and waste 3)purchase of recycled products, 4)purchase of reusable goods, 5)waste management practices, and 6)measuring ongoing consumables.	D1.2	Accepted	Criterion D1.2 is currently unclear and its purpose and content needs to be clarified, including with respect to D1.1. Some of the detail of the approach can be contained in the Guidance	Reword criterion D1.2 as follows: "D1.2 Consumable goods. The organisation actively seeks to reduce the purchase and use of disposable, consumable and perishible goods, including food."
Q25	128	in 2 : efficiency in action and equipments	D1.1	No change required	D1.1 covers the selection and purchase of capital goods on environmental grounds.	

Q25	65	<ul style="list-style-type: none"> IN-D1.2b: I would add an indicator around recycling policy and provision of refillable water bottles and refills to avoid plastic bottle consumption. 	D1.2	Partially accepted	This is covered by D2.4 Waste. Guidance can refer to reusing or eliminating packaging.	Consider overlap and differentiation between D1.2 (disposable goods) and D2.4 (waste) and look at wording of criteria, indicators and guidance
Q23	121	D1.2 NO FOAM PRODUCTS IN ISLAND NATIONS	D1.2	Rejected (with justification)	While this is desirable, it is too detailed an issue to be covered specifically in the GSTC-I at this level	
Q25	121	Final destination verification of waste products leaving tourism sector is paramount to preserving and advancing the industry. Tourism clusters and high traffic locations have a moral responsibility to invest in proper waste management by paying a fair price for waste services. Taking advantage of the local population through bidding wars for this service increases the chances for illegal dumping if final destination certification is not required.	D1.2	No change required	This is contained in D2.4. The requirement that "residual waste disposal has no adverse effect on the local population and the environment" would require the organisation to take responsibility for the final destination of the waste and of its management.	
ISWG	ER	A source of energy is different from the type of energy, and most common corporate reporting frameworks and ISO refer to energy by type. Also as worded, it is unclear whether the organization encourages customers to use renewable energy, or the certification encourages the organization to use renewable energy. Suggested edited criterion: "Energy consumption is measured, by each type, and measures are adopted to minimize overall consumption. The organization makes efforts to increase use of renewable energy."	D1.3	Accepted		Change D1.3 to read "Energy consumption is measured by type, and measures are adopted to minimize overall consumption. The organization makes efforts to increase its use of renewable energy."

Q23	11	Use or Green energy and reduce dependence of energy generate by fossil	D1.3	Partially accepted	Is covered in 1.3. New wording proposed to aid clarification.	Change D1.3 to read "Energy consumption is measured, by each type, and measures are adopted to minimize overall consumption. The organization makes efforts to increase use of renewable energy."
Q25	128	in 3 : sustainable and renewable	D1.3	No change required	Is generally covered	
ISWG	AR	SPLIT IN TWO	D1.4	Rejected (with justification)	Both parts of the criterion relate to water conservation and are clear. Splitting them would simply elongate the list of criteria. They can be considered as separate components anyway when assessing compliance.	
ISWG	BL	SPLIT IN TWO	D1.4	Rejected (with justification)	Both parts of the criterion relate to water conservation and are clear. Splitting them would simply elongate the list of criteria. They can be considered as separate components anyway when assessing compliance.	
ISWG	ER	Note should define whether desalination is considered sustainable.	D1.4	Accepted	Can be covered in guidance if it can be treated briefly	Refer to desalination, and its acceptability as a sustainable water source, in guidance,
Q25	128	in 4 : recycling, reuse, offset	D1.4	No change required	Is broadly covered in the criteria. Not clear which specific criterion is referred to, if any.	
ISWG	IS	Water consumption is minimized, measured and monitored. Water sourcing is sustainable, and does not adversely affect environmental flows.	D1.4	No change required	No change in meaning.	

Q14	75	"Source to Consumption" emissions and mitigation	D2	No change required	Already covered	
Q14	11	Risk management & Reduce Global Warming	D2	No change required	This process and outcome lie behind the Criteria	
Q14	119	Reducing or eliminating carbon footprint (with direct action & otherwise with offsets)	D2	No change required	Already covered in D2.1	
Q25	77	Generally, incentives are missing to continuously minimize pollution/consumption e.g. benchmark in the first year, afterwards minimizing pollution/consumption year after year (D1.3 Energy; D1.4 Water; D2.2 Transport greenhouse gas emissions; D2.4 Waste etc.) Guidance should include scientific based performance metrics which are measurable and auditable (e.g. Maximum of total volume of water in kiloliters consumed per source per specific tourist activity per guest)	D2	Partially accepted	Continuous improvement is implied in all D2 criteria and is widely recognised as good practice in environmental management, which is characterized by the continuous improvement cycle. Guidance on specific metrics could be included but may be considered to be too detailed at this level.	Consider level of guidance on metrics to use
Q14	130	Carbon measurement	D2	No change required	GHG emissions would include carbon emissions.	
Q23	94	D2 especially needs expanded link of impacts of tourism on local communities; to include their access to safe water and waste treatment as well as elaboration of ensuring impact of existing use contributes to environmental sustainability of local services.	D2	No change required	Is covered in B9	

Q25	125	In practical application the need to monitor and show reduction in usage is viewed as somewhat bureaucratic by some NZ operators. Given that most are SME's, some in remote locations, some off the grid in regards power and water; the practicality of measuring and monitoring is fruitless. What would be better is for the business to acknowledge and accept the main resource impacts relevant to the operation and location and inherent resources available; and monitor these; rather than a more general widespread set of resources. i.e. monitor and measure where the business can make a difference. Small operators will find it difficult and probably meaningless to measure greenhouse gas emissions. A focus on resource usage and reduction is more favourable which would ultimately lead to reduced emissions.	D2.1	Partially accepted	The principle and requirement of measurement where possible should be retained. It needs to be interpreted and applied according to local circumstances. However, the need to avoid an emphasis on measurement getting in the way of focussing on practicable action is accepted. With greenhouse gas emissions, in particular, there needs to be a change of wording.	Reword D2.1 to "Significant greenhouse gas emissions from all sources controlled by the organization are identified, calculated where possible, and procedures are implemented to minimize them. Offsetting of remaining emissions by the organization is encouraged"
ISWG	ER	Re-word criterion: "Significant greenhouse gas emissions from all sources controlled by the organization are measured, procedures are implemented to minimize them, and offsetting remaining emissions is encouraged." Should pass a threshold of significance. Also as worded, it is unclear whether the organization encourages customers to use offsets, or the certification encourages the organization to use offsets.	D2.1	Accepted		Reword D2.1 to "Significant greenhouse gas emissions from all sources controlled by the organization are identified, calculated where possible, and procedures are implemented to minimize them. Offsetting of remaining emissions by the organization is encouraged"
Q23	119	In addition to reducing emissions, our industry needs to be purchasing carbon offsets and inspiring others to participate as well.	D2.1	No change required	Covered in D2.1	

Q25	119	<p>We need to think in terms of reducing impacts and offsetting all impacts that we do not eliminate. See notes on carbon off-sets in preceding pages.</p> <p>Companies can achieve a zero carbon footprint through careful planning combined with the purchase of carbon offsets. Our industry should be leaders on this. Besides the ethical reason to do this, no industry will be more impacted by climate change than ours.</p>	D2.1	No change required	Covered in D2.1	
Q25	67	<p>Criterion D2.1 is creating a confusion with criterion D2.2. The Greenhouse Gas Protocol (GHG Protocol) could provide a well tested and recognised methodology for calculating and reporting carbon footprint that considers all direct and indirect greenhouse emissions from all sources controlled by the organisation including transport [https://www.carbontrust.com/resources/guides/carbon-footprinting-and-reporting/carbon-footprinting-download/]. Furthermore, I think that D2.2 "encouraging customers, staff and suppliers to reduce transportation-related green house gas emissions" should extent to all aspects of their activity during vacations and beyond. After all, the GHG emissions of an organisation -particularly in the hospitality industry- are strongly affected from the individual behaviour of every guest and employee. Not only their choices for transportation.</p>	D2.1	Partially accepted	<p>D2.2 is specifically about transport why D2.1 is about an organization's emissions. Emissions relating to transport are sufficiently important for transport to have a separate criterion. It is agreed that there is a need to ensure that visitors are engaged with all aspects of sustainability activity and reducing environmental impact. This is partly addressed in Section A in relation to communications.</p>	<p>Add new criterion AX: Reporting and communication. The organisation communicates its sustainability policy, actions and performance to stakeholders, including customers, and seeks to engage their support.</p>

ISWG	AR	Edit to transport only. "The organization encourages its customers, staff and suppliers to USE SUSTAINABLE TRANSPORT OPTIONS" 'ALL SOURCES' OF GHGS IS INCLUDED ABOVE .	D2.2	Accepted	Transport is a sufficiently important issue in relation to the environmental impacts of tourism to require separate treatment. It is not just about green gas emissions.	Reword D2.2 as follows: D2.2 Transport. The organization actively encourages the use of alternative (more sustainable) and reduced transportation by customers, employees, suppliers and in its own operations.
ISWG	BL	THE ORGANISATION IMPLEMENTS PRACTICES TO MINIMISE transportation-related greenhouse gas emissions.	D2.2	Partially accepted	While this wording is an improvement a more direct new wording with emphasis on transport rather than emissions is preferred.	Reword D2.2 as follows: D2.2 Transport. The organization actively encourages the use of alternative (more sustainable) and reduced transportation by customers, employees, suppliers and in its own operations.
ISWG	ER	Suggest remove criteria, add new criteria specific to transportation.	D2.2	Partially accepted	Criterion should stay but reworded	
ISWG	ER	The organization encourages the use of alternative and reduced transportation in customer transportation, operations and employee commutes.	D2.2	Accepted	Slight modification of proposed wording is preferred.	Change D2.2 to: The organization actively encourages the use of alternative (more sustainable) and reduced transportation by customers, staff, employees and in its own operations.

Q20	119	If we want outdoor cultural artifacts protected, we need to assure that our industry is a leader in achieving a zero carbon footprint (through direct action - like choice of non-polluting fuels - and through the purchase of carbon offsets, than can, for example, offset the negative impacts of driving our clients to see cultural sights using carbon fuels by finding the production of green energy to offset the damage we have just done to the atmosphere. Carbon off-sets work well (see TerraPass in the USA - http://www.terrapass.com/).)	D2.2	Partially accepted	Point is covered in D2.1 and D2.2. Reference to customer off-setting of transport could be added to Guidance, but subsidiary to a policy of encouraging seeing reduced and alternative transport options.	Reword D2.2 as follows: D2.2 Transport. The organization actively encourages the use of alternative (more sustainable) and reduced transportation by customers, employees, suppliers and in its own operations.
Q24	10	D2.2. should not be mandatory	D2.2	Rejected (with justification)	Transport issues are crucial to making tourism more sustainable. Whether 'mandatory' is a matter for the end users of the GSTC-I.	
Q25	76	Under transport, I would say not only to encourage to reduce transportation-related greenhouse gas emissions but to facilitate schemes to allow this (car sharing programmes for employees, safe bicycle parking space, electric cars or shuttles provided...).	D2.2	Partially accepted	Active encouragement is important but may involve different levels of facilitation. Facilitating use of alternative transport options (with examples) could be mentioned in guidance.	Reword D2.2 as follows: D2.2 Transport. The organization actively encourages the use of alternative (more sustainable) and reduced transportation by customers, employees, suppliers and in its own operations.
ISWG	AR	SEPARATE 1) "Wastewater, including gray water, is effectively treated and is only reused or released safely". 2) "Ensure no adverse effects to the local population and the environment". DEALT WITH IN B9 – CONSIDER COMBINING	D2.3	Rejected (with justification)	The two elements would each be considered separately anyway in the application of the standard. While second part is partially covered in B9 the latter is more about community issues than environment.	

ISWG	AR	Split 1) "Waste is measured, mechanisms are in place to reduce waste, and where reduction is not feasible, to re-use or recycle it." 2) "Any residual waste disposal has no adverse effect on the local population and the environment." DEALT WITH IN B9 – CONSIDER COMBINING. BL: SPLIT IN TWO. Replace "...where reduction is not feasible" with "...as a first, best practice and to alternatively...."	D2.4	Rejected (with justification)	The two elements would each be considered separately anyway in the application of the standard. While the second part is partially covered in B9 the latter is more about community issues than environment. It is arguable that 'reduce' should be the first approach to waste - so no obvious need to change this	
Q23	75	Recycle and Reduction cycles	D2.4	No change required	reduce, reuse and recycle are all mentioned in D2.4	
ISWG	IS	Food waste measured and reduced (hotel);	D2.4	Accepted	Food waste is a very important issue for tourism industry. It is sometimes not specifically referenced in addressing waste management and so therefore should be identified in the criteria for 2.4 as well as being underlined in indicators and guidance. It is also a resource management issue which needs to be addressed as an input, as in D1.2.	Criteria 2.4 to read: Waste (including food waste) is ...". Emphasise importance of food waste in indicators and guidance
ISWG	AR	SPLIT IN TWO. AGREE WITH ER THAT A DEFINITION WITH EXAMPLES BE PROVIDED OF 'HARMFUL SUBSTANCES'.	D2.5	Partially accepted	The points are already divided in the Criterion and further separation not necessary	Review definition of Harmful Substances vis a vis Hazardous Materials already in Glossary
Q23	96	See Section A comments that suggest including an "Occupational Health and Safety" section that relates to Indicator D2.5.A	D2.5	Rejected (with justification)	Occupation health and safety are already covered in B8. This section is about environmental impacts	

ISWG	BL	SPLIT IN TWO.	D2.5	Rejected (with justification)	The points are already divided in the Criterion and further separation not necessary	
Q24	118	There's some duplication in the list above. For e.g., what's the difference between d.2.5 and d.2.6?	D2.5	Rejected (with justification)	D2.5 and D2.6 are different. Use of harmful substances is a specific issue concerning inputs and their use, rather than just pollution control	
ISWG	ER	Suggest defining Harmful Substances, could place the “including” items into the definition along with others.	D2.5	Accepted		Review definition of Harmful Substances vis a vis Hazardous Materials already in Glossary.. Consider reducing the list in the criterion accordingly and possibly give examples in guidance if not in glossary
Q25	103	D2.5 - should include identifying & eliminating toxic sunscreens and mosquito repellents.	D2.5	Partially accepted	Too detailed for criteria but might be identified in definition and/or guidance. This needs to be addressed through influencing visitor behaviour, including offering advice on products purchased before leaving home	Consider including in definition and/or guidance.
ISWG	AR	WATER IS ALREADY INCLUDED IN D2.3;	D2.6	Rejected (with justification)	While there is a relationship, 2.3 is about treatment of wastewater not about other aspects of polluting water supplies.	

ISWG	BL	THIS IS A MASIVE ONE, UNCLEAR, WE SHOULD DISCUSS IT TOGETHER;	D2.6	Partially accepted	This list of sources and types of pollution is long but there is no suggestion that any are sufficiently unimportant not to be included and without this level of specificity the criterion becomes rather meaningless. It is important that this is further reviewed	Further review list of sources of pollution in criterion and guidance D2.6
ISWG	ER	Suggested edited criterion. Substitute 'substances' for 'compunds';	D2.6	Accepted		In D2.6 replace 'compounds' with 'substances'
Q23	120	Quality of Water an Quality of Bathing Water	D2.6	Rejected (with justification)	This further distinction is not necessary. The practices required by the criteria should address impacts on water and bathing water quality. Measurement of the latter is a matter for destinations (GSTC-D)	
ISWG	IS	Insert 'ANNUALLY' minimise pollution...;	D2.6	Rejected (with justification)	Virtually all the criteria, and the existence of a sustainable management system, imply ongoing management and there is no need to specify 'annual' in an individual criterion.	
ISWG	KSB	JUST WONDER IF WE COULD SUPPORT THE DARK SKIES INITIATIVE AND CALL THIS ONE OUT SEPARATELY, OR ANY OTHERS	D2.6	Rejected (with justification)	While the Dark Skies Initiative underlines the importance of including reference to light pollution in GSTC-I, specific reference to this initiative would imbalance the content	
Q23	10	Indoor air quality	D2.6	Rejected (with justification)	Air pollution is referred to and further specification to this level is not required	

Q23	130	Ethical , fair trade purchasing , noise and light pollution re dark skies	D2.6	No change required	All are included in various criteria	
Q23	145	I believe noise and light pollution are already referenced in criteria (?)	D2.6	No change required	They are covered in 2.6	
Q23	130	noise and light pollution re dark skies	D1.1	No change required	Dark skies' is an accepted reason for being concerned about light pollution	
Q25	107	Under section D3 - I would like to see a more proactive approach to enable organisations and institutions tasked with nature conservation and the management of protected areas to fund additional works through the development of 'voluntourism' activities where guests can support efforts financially and through the labour.	D3	Partially accepted	Organizations should not only support conservation activity themselves but encourage their guests to do so. This should be clearly identified in indicators and guidance	Indicators and guidance for D3.4 and potentially C3 and A8 should make reference to encouraging giving by guests (money and other support)
Q25	23	D3 should include a sub-aspect asking the company to provide a space for biodiversity education, explaining what the native and endemic flora and fauna are.	D3	Partially accepted	Information and interpretation is currently covered in A8 but also relates to 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."
Q14	112	Flora & Fauna protection as well as the habitat	D3	Accepted		Check contents so that wildlife (flora and fauna) is covered as well as habitat where this may not be obvious

ISWG	AR	EDITED – AGREED WITH BL "Wildlife species are not harvested, consumed, displayed, sold, or traded"	D3.1	Rejected (with justification)	Without the qualification in the latter part of the criterion, which allows for sustainable use, this would reject any form of zoo or aquarium (however well managed) including those whose mission is to promote and achieve the worldwide conservation of animals and their habitats, and maybe even the sustainable collection of wild nuts, berries and mushrooms for use in local dishes. While some people would applaud this, it may be too heavy as a blanket requirement. It needs further consideration.	
ISWG	BL	EDITED – "Wildlife species are not harvested, consumed, displayed, sold, or traded"	D3.1	Rejected (with justification)	Without the qualification in the latter part of the criterion, which allows for sustainable use, this could reject any form of zoo or aquarium (however well managed) including those whose mission is to promote and achieve the worldwide conservation of animals and their habitats, and maybe even the sustainable collection of wild nuts, berries and mushrooms for use in local dishes. While some people would applaud this, it may be too heavy as a blanket requirement. It needs further consideration.	
Q16	137	A.6.2. Add: No food, souvenirs or items are purchased nor sold that are listed by "CITES"	D3.1	Partially accepted	Not appropriate for A6.2 but relevant to Section D. Refer to CITES in Indicators/Guidance for D3.1	Refer to CITES in Indicators/Guidance for D3.1

Q25	32	Where is 3.1?	D3.1	Rejected (with justification)	This refers to an omission in the text associated with the survey questions	
Q23	93	Exclude any "recreational" activities that involve violence or disrespect to animals, including hunting, fly-fishing, bull-fights and similar	D3.1	Rejected (with justification)	D3.1 provides for the necessary exclusion.	
Q25	116	D3.1 missing from your survey list - typo IN D3.1a national rather than local laws should be the reference. As guidance CITES should be the reference for many of the implied activities.	D3.1	Accepted		Amend D3.1 indicator to include 'national'. Refer to CITES as the reference for many of the activities.
ISWG	AR	Edit – AGREED WITH BL "No captive wildlife is held. Living specimens of protected and wildlife species are NOT kept."	D3.2	Rejected (with justification)	Without the qualification in the latter part of the criterion, which provides exceptions under certain conditions, this would reject any form of zoo or aquarium (however well managed) including those whose mission is to promote and achieve the worldwide conservation of animals and their habitats. Opinions differ on this and it would need further consideration. A change to D3.2 is proposed that addresses	

ISWG	BL	Edit – "No captive wildlife is held. Living specimens of protected and wildlife species are NOT kept." Also BL.	D3.2	Rejected (with justification)	Without the qualification in the latter part of the criterion, which provides exceptions under certain conditions, this would reject any form of zoo or aquarium (however well managed) including those whose mission is to promote and achieve the worldwide conservation of animals and their habitats. Opinions differ on this and it would need further consideration. A change to D3.2 is proposed that addresses	
ISWG	KSB	SHOULD WE ADD SOMETHING ABOUT INTRODUCED SPECIES BEING PROPERLY CAGED / CARED FOR, ETC.?	D3.2	No change required	This appears to be what is meant in D3.2	
Q23	144	Although the D3 criteria consider implications for wildlife, they do not take into account welfare implications that can come with captivity and interaction with wild animals in the tourism industry. Therefore, we strongly recommend to include welfare aspects in sections D3.2 and D3.5.	D3.2	Accepted		See changes to D3.2 and D3.5 proposed below as a result of similar point from the same consultee.

Q25	144	<p>2. Currently section D3.2 and D3.5 both focus on the impacts that keeping and interacting with wildlife may have on populations and ecosystems. However, these criteria should also ensure the travel and tourism industry does not adversely impact on the welfare needs of wild animals, as well as considering the conservation of species. Recent research by Oxford University (Moorhouse, et al., 2015) has reported on the implications of the increasing demand for wildlife tourism and found that wildlife tourism attractions often have substantial negative effects that are unrecognised by the majority of tourists. This suggests an urgent need for tourist education and regulation of these wildlife tourist attractions worldwide. Through these criteria GSTC has an opportunity to improve the lives of the 550,000 wild animals held captive in the global tourism industry by setting standards that will drive tour operators to make sustainable choices that will in turn move wildlife tourism venues to improve practices that impact negatively on wild animal welfare or conservation. In addition to our recommendation to add an extra section (D4) to address animal welfare, we also recommend the below changes to sections D3.2 and D3.5. D3.2 – Currently the criteria for this section reads that ‘no captive wildlife is held, except for properly regulated activities, in compliance with local to international law.’ However local and international law often allows for wildlife to be held captive in ways that do</p>	D3.2	Accepted	<p>Criteria 3.2 is not only concerned with populations and ecosystems but are also concerned with the welfare of animals involved. Changes to D3.2 can be made as recommended and further reference made to the five freedoms mentioned. Criterion 3.5 does suggest greater concern for the welfare of populations rather than the animals concerned and this can be amended.</p>	<p>Amend D3.2 to include: “No captive wildlife is held, except for properly regulated activities (in compliance with local to international law) that ensure that the basic welfare needs of living specimens of wild fauna are met. Living specimens of protected and wildlife species are only kept by those authorized and suitably equipped to house and care for them humanely.” Could refer to the five basic freedoms in guidance or in a new definition of 'basic welfare needs of animals' in the glossary. Amend D3.5 to read "...adverse effects on the animals concerned and on the viability and ..."</p>
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Q26	144	As the expansion of GSTC-HTO to GSTC-Industry provides opportunity to create detailed indicators for additional tourism industry sectors, including attractions or events where wildlife may be involved, we suggest further exploring the potential impacts these industry sectors have on the welfare and conservation needs of wild animals and encourage GSTC to consult wildlife experts and animal welfare organisations, such as World Animal Protection, in the development of any additional indicators.	D3.2	Accepted	These points are helpful with respect to any future development of indicators for this specific sector or activities.	Address when any relevant new indicators are developed
Q24	129	(NOT) Alien Species	D3.3	Partially accepted	While removal of this criteria is not justified, it is proposed to change it to invasive rather than 'alien' species	
ISWG	AR	Edit - INVASIVE species. AGREE WITH ER TO CHANGE TO INVASIVE RATHER THAN ALIEN. Agree with BL to separate. SUGGEST, HOWEVER, THE NATIVE SPECIES USED FOR LANDSCAPING BE COMBINED WITH A6.3.	D3.3	Partially accepted	Invasive species' is more appropriate than 'alien species'. No need to split and will be treated separately anyway. Important to keep the reference here rather than in the wider context of A6.3.	Change 'Alien' to 'Invasive' in D3.3
ISWG	BL	SPLIT IN TWO	D3.3	Rejected (with justification)	No need to split and will be treated separately anyway.	
Q25	50	See previous comments but in environmental context. For example provision to not transport alien species in an urban is contentious if an urban hotel has indoor plant.	D3.3	Partially accepted	The proposed change of the criterion to address invasive rather than alien species should meet the point raised.	

Q25	79	Change 'alien' to 'non-native'	D3.3	Rejected (with justification)	While this suggestion would have been helpful as an alternative to 'alien', it is now proposed to address invasive species in Criterion 3.3 as the primary environmental concern.	
ISWG	ER	Suggested edited criterion to 'Invasive'. Suggest defining invasive species.	D3.3	Accepted		Change 'Alien' to 'Invasive' in D3.3. Revise definition in glossary to invasive species
Q25	117	in criterion D3.4 Biodiversity conservation, one could include the use of native plant species (instead of various foreign ornamentals) in the establishment for e.g of hotel gardens and green spaces that would be differentiated from place to place and not uniform gardens as is now the case!	D3.3	No change required	Is covered in D3.4	
ISWG	AR	COMBINE WITH B1 FOR PERCENTAGE OF ANNUAL BUDGET AND A8 FOR EDUCATION	D3.4	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.
Q16	142	Under D3.4 Biodiversity conservation – in terms of the second indicator, it needs to state who the environmental education should be targeted at.	D3.4	Accepted	In fact this Criterion is not really dealing with environmental education	Remove second indicator in D3.4
ISWG	IS	Support of local NGOs, the involvement of voluntary sector (hotel and tour operator);	D3.4	Accepted	Too specific for the criterion but can be included as indicator or guidance	Refer to communication with and support for local conservation NGOs in indicator or guidance

Q25	137	D.3.4. Add: Communication/cooperation with local conservation organizations	D3.4	Accepted		Refer to communication with and support for local conservation NGOs in indicator or guidance
Q25	80	D.3.4: Remove reference to annual budget, but encourage Financial support.	D3.4	Accepted	The indicator as currently worded is too prescriptive and specific	Reword indicator to refer to level of support for biodiversity conservation related activity
Q25	65	• IN-D4.4aiv: I suggest an additional sub-indicator around care of wildlife (endangered species or wildlife rescue).	D3.4	Rejected (with justification)	This would be too specific. The major issues of concern are covered in D3.2 and D3.5	
ISWG	AR	AGREE WITH BL – SEPARATE, BUT TO 3, WITH POTENTIALLY COMBINING THE THIRD POINT WITH B1. 1) "Interactions with wildlife, ARE EXPERIENCED IN ACCORDANCE WITH LOCAL AND/OR INTERNATIONAL REGULATIONS RECOGNISING POTENTIAL EFFECTS on the viability and behaviour of populations in the wild." 2) "Any disturbance of natural ecosystems is minimized, AND rehabilitated". 3) "There is a compensatory contribution to conservation management" CONSIDER COMBINING (3) WITH B1.	D3.5	Partially accepted	No need to separate as can be treated separately when required. Would be confusing to combine with BI which deals with communities not environment. Amendment to wording of the first part is accepted, with adjustment, as it is helpful to link to regulations which in turn, when local, should address the issue of cumulative impacts which would not be kept in the criterion is this change of wording is made	Change wording of D3.5 Wildlife interactions as follows: Interactions with wildlife, taking into account cumulative impacts, do not produce adverse effects on the animals concerned or on the viability and behaviour of populations in the wild.
No need to se		SPLIT IN TWO.	D3.5	Rejected (with justification)	No need to separate as can be treated separately when needed.	
Q25	53	Don't pick or take plant species or seeds	D3.5	Rejected (with justification)	Too specific a detail. Provision of information for visitors on how to behave in natural sites is partly covered in A8 and needs to relate also to section D3	

Q25	126	More specific guidelines for animal interaction and in particular elephant camps with painting, football shows, rides in poor conditions not respecting elephant welfare need to be developed	D3.5	Rejected (with justification)	Too specific a detail. Provision of information for visitors on how to behave in natural sites is partly covered in A8 and needs to relate also to section D3	
ISWG	JK	Move with other wildlife questions to reinforce importance.	D3.5	Accepted		Reorder the criteria in D3
Q25	77	D3.5 Wildlife interactions: Guidance should ask for the implementation of national and international recognised "Best practice guidelines"	D3.5	Accepted		Change wording of D3.5 Wildlife interactions as follows: Interactions with wildlife, taking into account cumulative impacts, do not produce adverse effects on the animals concerned or on the viability and behaviour of populations in the wild.
Q23	21	Promoting ethical wildlife viewing practices	D3.5	No change required	Is covered in D3.5 which will be strengthened	
Q23	147	(wild) Fire prevention, not feeding wild animals	D3.5	Partially accepted	Provision of information for visitors on how to behave in natural sites is partly covered in A8 and needs to relate also to section D3	Review guidance for D3.5 and new D.X
Q23	114	This may be covered, but there should be a portion that disusses if these business help to educate their guests and visitors of the harmful affects of feeding local wildlife. (i.e. here in Costa Rica many hotels do not stop their guests from feeding the monkey hamburgers and other harmful food)	D3.5	Partially accepted	Provision of information for visitors on how to behave in natural sites is partly covered in A8 and needs to relate also to section D3	Review guidance for D3.5 and new D.X
Q23	29	D1, D2, D3		No change required	Reaffirms the need for these sections	