

GSTC Interpretation Document

Interpretation of the GSTC Requirements of Environmental Purchasing of Protected Species

3 March 2026

Interpretation Document Control Number	2026INTD01
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Document(s) Referenced:	<ul style="list-style-type: none"> • GSTC Industry Standard version 3.0 for Hotels and Accommodations • GSTC Hotel Standard version 4.0 • GSTC Requirement for Hotel’s Performance Against Eight GSTC Criteria
Document Section(s) Referenced	<p>Criterion D1.1 – Environmentally Preferable Purchasing (GSTC Industry Standard version 3.0 for Hotels and Accommodations)</p> <p>Indicators A13.8 and D13.3 (GSTC Hotel Standard version 4.0)</p>
Specific Item(s) Referenced	“Shark fin soup” under GSTC Requirement for Hotel’s Performance Against Eight GSTC Criteria
Description of Ambiguity or Uncertainty	<p>Certification Bodies have requested clarification regarding whether a hotel that serves shark fin soup can be considered compliant with GSTC’s environmentally preferable purchasing requirements</p> <p>The ambiguity arises from:</p> <ul style="list-style-type: none"> • The explicit listing of “shark fin soup” as an example in the ‘GSTC Requirements for Hotel’s Performance against Eight GSTC Criteria’; • The note states that threatened and endangered species may be actively managed under national sustainable utilization strategies in some destinations. • The existence of jurisdictions where shark fishing is legal and subject to national fisheries management systems.

	<p>Clarification is required to ensure consistent interpretation and harmonized audit approaches across regions.</p>
<p>GSTC Interpretation</p>	<p>1. Principle-Based Interpretation</p> <p>Shark fin soup is explicitly referenced due to globally recognized sustainability risks associated with:</p> <ul style="list-style-type: none"> ● Shark finning practices; ● Overfishing and stock depletion; ● Illegal, unreported, and unregulated (IUU) fishing; ● A high proportion of shark and ray species are listed as threatened on the IUCN Red List. <p>Accordingly, shark fin soup shall be treated as a high-risk product under the GSTC Standard.</p> <p>The default audit position should be that offering shark fin soup is not acceptable unless robust, verifiable evidence demonstrates compliance with all elements of relevant criteria and indicators.</p> <p>2. Conditional Acceptability</p> <p>GSTC does not apply an automatic global prohibition on all shark-derived products. However, serving shark fin soup is only acceptable if the hotel can clearly demonstrate all of the following:</p> <ul style="list-style-type: none"> ● Species Status <ul style="list-style-type: none"> The species used is not listed as threatened or endangered under: <ul style="list-style-type: none"> ○ IUCN Red List (threatened categories), ○ CITES Appendices (where applicable), ○ Relevant national protection lists. ● Legal Sourcing <ul style="list-style-type: none"> The product is legally sourced in accordance with applicable national laws. ● Responsible Fisheries Management <ul style="list-style-type: none"> Credible and verifiable evidence demonstrates: <ul style="list-style-type: none"> ○ Prohibition of finning (e.g., fins naturally attached policies), ○ Science-based stock management, ○ Compliance with relevant Regional Fisheries Management Organizations (RFMOs), where applicable. ● Traceability <ul style="list-style-type: none"> ○ Full traceability from catch to final product, ○ Supporting documentation demonstrating legal acquisition and supply chain integrity. ○ Where possible, third-party assurance mechanisms. <p>If any of the above elements cannot be clearly and convincingly demonstrated, the offering shall be considered non-compliant with</p>

	<p>criterion D1.1 of GSTC Industry Standard version 3.0 for Hotels and Accommodations or indicators A13.8 and D13.3 of GSTC Hotel Standard version 4.0.</p> <p>3. Practical Audit Guidance</p> <p>Due to the complexity of:</p> <ul style="list-style-type: none"> ● Species identification, ● International trade flows, ● Differing national regulatory approaches, <p>Certification Bodies shall apply a precautionary approach.</p> <p>This includes:</p> <ul style="list-style-type: none"> ● The burden of proof lies with the hotel or restaurant. ● Auditors shall not rely solely on supplier declarations or general legality claims. ● Where uncertainty remains regarding species protection status, traceability, or management effectiveness, the offering shall be treated as non-compliant. ● In the absence of transparent and verifiable documentation, acceptability shall not be assumed.
<p>Rationale</p>	<p>Criterion D1.1 (of GSTC Industry Standard version 3.0 for Hotels and Accommodations) and Indicators A13.8 and D13.3 (of GSTC Hotel Standard version 4.0) are intended to prevent tourism businesses from contributing to:</p> <ul style="list-style-type: none"> ● Biodiversity loss, ● Trade in threatened or endangered species, ● Illegal or unsustainable wildlife exploitation. <p>Shark fin soup is referenced in the Hotel’s Performance Requirements because it is widely associated with high protection risk and global concern. However, the requirement remains principle-based and science-based rather than culture-based.</p> <p>The note acknowledges that certain species may be managed under national sustainable utilization strategies. Therefore, GSTC does not impose a categorical ban. Instead, compliance depends on:</p> <ul style="list-style-type: none"> ● Species protection status, ● Legality, ● Responsible management, and ● Verifiable traceability. <p>This interpretation ensures:</p> <ul style="list-style-type: none"> ● Alignment with global biodiversity protection standards, ● Consistency across Certification Bodies, ● Application of the precautionary principle, ● Protection of the credibility and integrity of the GSTC certification.

For further clarification, please contact accreditation@gstc.org