GSTC Report on the Accreditation Manual Revision

Summary of the Revision Process and Key Changes

GSTC-ACCREDITED Administered by GSTC Manual Version 1.2.
to
GSTC Accreditation Manual for Certification Bodies - Destination Version 2.0

March 26, 2025

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Document Control

This report outlines the revision process and key changes to the GSTC Accreditation Manual for Certification Bodies - Destination.

Document Approval

March 26, 2025
GSTC Chief Assurance Officer

1. Introduction

Background

The *GSTC Accreditation Manual for the Certification Bodies - Destination version 2.0* (abbreviated as the Destination Accreditation Manual throughout the report) serves as a key guide to ensure the quality of the accreditation process for Certification Bodies (CBs) and outlines the requirements both for their accreditation and for the proper implementation of the GSTC Certification process for destinations. Given the dynamic nature of destinations and the GSTC's approach to continuous improvement, periodic updates and revisions are essential to maintain relevance and address emerging trends and challenges. The need for a revised manual became apparent to better align with current best practices, regulatory changes, and stakeholder feedback.

In response to these needs, the *GSTC-Accredited Manual for Destinations Version 1.2* has been updated to the *GSTC Accreditation Manual for the Certification Bodies - Destination Version 2.0*. This comprehensive revision aims to enhance the clarity, applicability, and overall effectiveness of the Destination Accreditation Manual. The revision process consists of multiple stages to ensure thoroughness and inclusivity, including expert review of the first draft, a review by the Accreditation Decision Making Committee (ADMC) (formerly known as the Assurance Panel), a 100-day public consultation, and feedback from GSTC destination members.

The initial draft was prepared by the GSTC Accreditation Secretariat in collaboration with academics specializing in sustainable tourism and destination management. It was then reviewed by the ADMC. Following their proposal, the document was shared with a diverse range of stakeholders, including Certification Bodies, Non-Government Organizations (NGOs), industry experts from the travel and tourism sector, and individual consultants.

The report summarizes the changes of the *GSTC-Accredited Manual for Destinations Version 1.2* to *GSTC Destination Accreditation Manual Version 2.0*. taking into account the feedback and comments from stakeholder who participated in the public consultation process. The report has been prepared to demonstrate clarity and transparency in the consultations and revision processes by addressing each specific feedback from the stakeholders and GSTC's response and actions to these feedback. The main changes and key outcomes of the extensive public consultations will be highlighted in the results section to provide a general overview of the major changes. In Annex A, all comments and feedback for the revised clauses have been presented with the evaluation and actions of the GSTC Secretariat.

Accreditation Manual Revision History

Version number	Main changes	Effective date
1.0	First publication	October 20, 2017
1.1	Minor revision with some corrections of typos and expression changes	December 30, 2017
1.2	Minor revision with some corrections of typos and expression changes	May 10, 2018
2.0	Restructuring of the manual, enhancing the clarity of definitions and phrasing, along with a refinement of the requirements	March 26, 2025

Purpose

The report is prepared to provide a comprehensive overview of the revision process of the Accreditation Manual. Therefore, this document:

1. outlines each stage of the revision process, including the development of the initial draft, which parties were involved during the revision and which steps were followed by GSTC.

2. highlights the key changes resulting from the public consultations and provide a summary of the main differences between the previous version 1.2 and Version 2.0.

3. provides a detailed analysis including all feedback received from stakeholders during the revision process and GSTC's evaluation, responses and actions for the feedback.

The report aims to ensure transparency in the revision process, demonstrate the thoroughness of the updates made, and underscore the GSTC's commitment to maintain high standards of quality in the accreditation for certification bodies on certifying the destination.

2. Methodology

The new version of the GSTC Destination Accreditation Manual was created based on stakeholder engagement, review of normative references of the International Standard Organization (ISO) documents, and internal discussions.

Review of normative references

The following documents were reviewed as normative references for version 2.0:

- ISO/IEC 17065:2012
- ISO/IEC 19011:2018
- IAF MD 1:2023
- IAF MD 4:2023
- IAF MD 5:2023

In addition, the *ISEAL Code of Good Practice for Sustainability Systems v1.0* was reviewed to follow its stakeholder engagement requirement during the public consultation and reflect the assurance requirements into the manual.

Stakeholder engagement

Various stakeholders were invited to give their opinions through public consultations and email. The aim was to collect the comments and hear from all stakeholders related to the revised version, including the GSTC-accredited certification bodies, GSTC-Recognized standard owners, GSTC members, and other relevant parties.

Apart from promoting on the GSTC website, the public consultation was promoted through social media platforms such as Linkedin, Instagram, X (formerly Twitter) and Facebook and emails to different stakeholders in the GSTC network.

The following are the methods used for outreach:

1. **ADMC comments**

   Members of the GSTC ADMC were invited to comment on the draft manual before and throughout the whole public consultation process in a tool designed to track all comments provided by stakeholders.

2. **Online public consultation from May 20th, 2024 to August 28th, 2024 (100 days)**

   An online survey using SurveyMonkey was created and published on the GSTC website to collect feedback and comments from key industry players and stakeholders. It was also distributed by email to the GSTC network.

3. **Destination member feedback**

   a. **Destination Members Meeting during the GSTC Conference on November 13th, 2024**

   The draft changes were shared in the pre-conference meeting with Destination members, and their verbal feedback was received.

   b. **Via emails from January 14th to 20th, 2025.**

   An informative email was sent to the GSTC destination members to receive their feedback from January 14th to January 20th, 2025. GSTC collected the feedback via email and analyzed it by responding to each comment.

3. Results

Key comments received

Comments on the Destination Accreditation Manual and suggestions for changes can be summarized below. For details, please see Annex A and B:

- Clarity on definitions and wording, including:
  - To be clear on who will be affected by this Manual;
  - To allow flexibility in the order of criteria in the audit report accreditation assessment;
  - To allow flexibility on destination certification cycle and surveillance audit;
  - To facilitate and provide guidance on the level of risk assessment for CBs while preparing for audits;
  - To allow flexibility on the audit checklist/evaluation tool used by the CB;
  - To add the definition of the scope of the destination certification.
- Clearer guidance on:
  - The eligibility for the initial certification process by indicating whether preliminary steps are mandatory;
  - The conditions upon which the CB shall consider the client as high or low risk.
- Flexibility on:
  - The requirements for destination certification
    - The range of sustainability standards that the tourism businesses within a destination should be certified against;

- The certification scheme against which the tourism business should be certified shall demonstrate that a robust process was followed and is not mandated to be accredited by a specific body (IAF);

- To allow industry-specific/national standards and certification to be acceptable and not only GSTC-Recognized standards;

- The percentage of the certified tourism business within a destination is not to be fixed;

- To allow some flexibility of the percentage of renewable energy for some destinations who may have constraints in deploying renewable energy.

Summary of the key changes

The Accreditation Manual v.2.0 was drafted after collecting feedback from the public consultation and internally discussing how to reflect on the comments received. While changes on the content of the Manual were questioned, clearer definitions and phrasing were needed to make the Manual more understandable.

While considering the feedback and comments from the Certification Bodies, ADMC, and consultants, several clauses have remained as previously drafted by GSTC, while others have undergone revisions. These include[1]:

- Definitions and requirements regarding the entities subject to the Destination Accreditation Manual and its applicability;

- Newly established step-by-step pathways, accompanied by clearer eligibility requirements for destination certification;

- Initial and re-certification audits shall be conducted on-site;

- Implementation of a three-year certification cycle with surveillance audits to be conducted on-site or in a hybrid format;

- Comprehensive risk assessments to be conducted prior to audits and clarified risk factors CB shall consider to determine audit frequency and duration;

- Responsibility of the CB to provide justification for assigned risk levels using qualitative evaluation methods;

- The requirements for certified tourism businesses, renewable energy, and green transport;

- Surveillance activities to be included in the audit program; within the destination; and

- 5-year accreditation cycle with surveillance assessments;

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[1] For more details please see the Comment log in Annex A and B.

- Enhanced auditor qualifications, including audit experience and required knowledge, to ensure a rigorous certification process.

4.   Conclusion and next steps

While all comments received were carefully considered, internal discussions led to the decision to retain certain clauses to maintain an effective and rigorous assessment process. The new Destination Accreditation Manual is now accessible on the GSTC website and will be effective on April 1, 2025. The new manual will be gradually integrated into the GSTC accreditation assessment process over a one-year transition period from April 1, 2025 to March 31, 2026.

For more detailed information, please refer to the *Transition Requirements on the GSTC Accreditation Manual for Certification Bodies - Destination Version 2.0*. This document provides specific transition period requirements, the implementation of new requirements, and details regarding the Accreditation Fees.

GSTC remains committed to continuously enhancing its standards and practices, ensuring transparency by reporting on any significant changes. By promoting sustainable and responsible practices in the tourism industry, GSTC continues to play a vital role in advancing global sustainable tourism standards.

Annex A. Comment log and Analysis

A list of participants in the public consultation in alphabetical order. Individuals from the organizations have given feedback. The comments and feedback do not necessarily reflect the views of their organization.

Stakeholder Group

Group	Organization
GSTC-Accredited Certification Body	EarthCheck ● Green Destination ● Vireo
Certification Body	● ISOQAR
Public Sector	● Autoridad de Turismo de Panamá ● Ministry of Tourism and Youth of Serbia ● Singapore Tourism Board ● Porto and North Convention & Visitors Bureau ● Royal Djurgården Visitor Center ● Tourism Authority Mauritius ● Vorarlberg Tourismus GmbH ● Park City Chamber & Visitors Bureau ● IDM Südtirol
Private Sector	● World Wildlife Fund (WWF) ● ETIFOR ● Mindful4Y Consulting UG ● Leave No Trace Ireland ● Societá Cooperativa Turistica Alta Badia ● And individuals

Comment Log

A.1 Assurance Panel

The Assurance Panel review was conducted following the initial draft prepared by the GSTC Accreditation Secretariat and experts. The "GSTC Review and Decision" column in the Assurance Panel Comment Log reflects the resulting initial revisions. However, additional changes were made during the public consultation process. As a result, some clauses may have been further modified, integrated differently in the final version, or removed entirely.

No	Section	Clauses From Initial Draft	Panel Comments	GSTC Review and Decision
1	Introduction	Accreditation to certify to the GSTC Criteria is designed to be applicable to all schemes certifying tourism enterprises for their sustainability management and performance. Relevant certification schemes and the bodies that run these schemes vary from sizable international operations or national schemes, some with support from government agencies to small schemes covering local areas or specific types of tourism products.	"or destinations" added. Accreditation to certify to the GSTC Criteria is designed to be applicable to all schemes certifying tourism enterprises or destinations for their sustainability management and performance. Relevant certification schemes and the bodies that run these schemes vary from sizable international operations or national schemes, some with support from government agencies to small schemes covering local areas or specific types of tourism products.	Thank you for your comment. We have revised it as follows: Accreditation to certify to the GSTC Criteria is designed to be applicable to all schemes certifying tourism enterprises or destinations for their sustainability management and performance. Relevant certification schemes and the bodies that run these schemes vary from sizable international operations or national schemes, some with support from government agencies to small schemes covering local areas or specific types of tourism products.
2	2. Normative References	GSTC Checklist - Certification Scheme - Certification Body Framework.	Maybe not the same status as other Normative documents in the list. Consider listing separately?	Thank you for your comment. We will keep it for now. After public consultation, if there is confusion, we will review and revise it.
3	4. Introduction	4.1.1 Gain accreditation from GSTC or by which conforms to Part II; and	Text not clear	Thank you for your comment. We have revised it as follows: 4.1.1 Gain accreditation from GSTC or by the GSTC-endorsed NAB in mutually agreed-upon countries, including EU countries.
4	5. Scope of Accreditation	5.1.2.3.3 The GSTC equivalent criteria and indicators in the GSTC-Recognized Standard shall be edited in the same order as the GSTC Criteria for efficient accreditation assessments.	"Shall changed to should" 5.1.2.3.3 The GSTC equivalent criteria and indicators in the GSTC-Recognized Standard shall should be edited in the same order as the GSTC Criteria for efficient accreditation assessments.	Thank you for your comment. We will keep it for now.

5	5. Scope of Accreditation	a. For the GSTC Accreditation Assessment, it is required to prepare an audit report using the GSTC-Recognized Standard in the order of GSTC Criteria. This applies to all types of assessments, including initial, surveillance, re-certification, and scope expansion assessments.	While following the same order would make the accreditation assessment easier, we wonder if it is necessary and justified to make it a strict 'requirement' - it is a technical preference. In fact, it may be difficult for CBs that are certifying against GSTC-Recognized standards, which may have a different ordering, to re-order the report in this way.	Thank you for your comment. It concerns the order of smooth assessment on-site and report review. We expect some complaints from public consultation. After that, we will revise it, considering AP's and other stakeholders' comments.
6	5. Scope of Accreditation	5.3.2.1 Accreditation Requirements are covered by legislation;	Should say 'Certification requirements rather than Accreditation requirements' ??	Thank you for your comment. We mean "Accreditation Comments"; we will keep it for now.
7	7. Accreditation Expiration and Renewal	7.5.1 Five years from the initial GSTC-Accredited status.	5 years should be OK. Is the max allowed in ISO 17011	Thanks for the comment. We will keep it as you said.
8	7. Accreditation Expiration and Renewal	7.6 Should a standard no longer be a GSTC-Recognized Standard the certification program has a twelve-month period in which to re-apply or renew the GSTC-Recognized status of a standard following the GSTC-Recognized Manual.	Should clarify that it is the standard owner that needs to re-apply, with clear communication with any affected CABs.	Thank you for your comment. We have revised it as follows: 7.6 If a standard is no longer recognized by GSTC, the standard owner has a twelve-month period to re-apply or renew the GSTC-recognized status of the standard following the GSTC-Recognized Manual. During this period, the standard owner must communicate clearly with any affected Certification Bodies (CBs).
9	7. Accreditation Expiration and Renewal	7.9 In the event of non-compliance with the obligations assumed by the applicant or the GSTC-Accredited CB and depending on the severity in terms of compromising the system in terms of quality and credibility of accreditation-related activities, sanctions can be established by the GSTC.	"established changed to applied" 7.9 In the event of non-compliance with the obligations assumed by the applicant or the GSTC-Accredited CB and depending on the severity in terms of compromising the system in terms of quality and credibility of accreditation-related activities, sanctions can be applied ~~established~~ by the GSTC.	Thank you for your comment. We have revised it as below: 7.9 In the event of non-compliance with the obligations assumed by the applicant or the GSTC-Accredited CB and depending on the severity in terms of compromising the system in terms of quality and credibility of accreditation-related activities, sanctions can be applied by the GSTC.

10	7. Accreditation Expiration and Renewal	7.10.1 The GSTC-Accredited CB shall apply for an extension of its scope to provide auditing and certification services to the GSTC-Recognized Standard owned by a certification scheme.	"to any new, additional or amended " added. The suggested changes may make this slightly clearer in relation to scope extension. 7.10.1 The GSTC-Accredited CB shall apply for an extension of its scope to provide auditing and certification services to any new, additional or amended the GSTC-Recognized Standards owned by a certification scheme.	Thank you for your comment. We have revised it as follows: 7.10.1 The GSTC-Accredited CB shall apply for an extension of its scope to provide auditing and certification services to any additional GSTC-Recognized Standards owned by a certification scheme.
11	8. Conformity with GSTC Requirements	8.2.1 CBs shall conform to the additional requirements for ISO 17065 set out in Clause 8.5.	Suggest clearer text: 'CBs shall conform to requirements set out in Clause 8.5, additional to the requirements of ISO 17065'	Thank you for your comment, but it is about additional requirements to ISO 17065 requirements, and this clause sentence delivers the meaning well. Therefore, we will keep it.
12	8. Conformity with GSTC Requirements	8.3 The CB shall comply with all normative references in this Accreditation Manual	Suggest adding 'where applicable' as some of the NR are guidance documents, not requirements documents 8.3 The CB shall comply with all normative references in this Accreditation Manual, where applicable	Thank you for your comment. We have revised it as follows: 8.3 The CB shall comply with all normative references in this Accreditation Manual, where applicable * _The clause was reviewed following the Accreditation Panel's revision and, upon further deliberation, was removed from the manual._
13	8. Conformity with GSTC Requirements	8.5.12.1 The CB shall define the scope of certification with the client by identifying the scope of the destination as per the following definition:	'as per the following definition' seems a redundant statement. There is no following definition. Typo?	Thank you for your comment. We will add the definition of Destination WG's suggestion for the public consultation. We may change the definition later, as the WG is still discussing it.

14	8. Conformity with GSTC Requirements	8.5.13.4 The certification cycle shall be 3 years, the audit program shall establish as a minimum, a surveillance audit every year and a recertification audit shall begin over the year prior to the expiration of certification.	3 year cycle seems reasonable. Level and frequency of surveillance audit requirements should be carefully considered. Some flexibility may be helpful depending on individual circumstances. It should not place unnecessary or unachievable burdens on CABs. A mix of on-site and remote surveillance may be considered.	Thank you for your comment, but the same approach will be followed for the GSTC Certification, and the 3-year cycle will be kept.
15	8. Conformity with GSTC Requirements	Note. The relevant stakeholders to the destination's tourism development and management include tourism businesses, communities, civil societies, academia, and other organizations and individuals. During an audit, CBs shall identify all stakeholders involved and ensure their inclusion in the process.	Note. The relevant stakeholders to the destination's tourism development and management include tourism businesses, communities, civil societies, academia, and other organizations and individuals. During an audit, CBs shall identify the full range of all stakeholders involved and ensure their inclusion in the process.	Thank you for your comment. We have revised it as follows: Note. The relevant stakeholders to the destination's tourism development and management include tourism businesses, communities, civil societies, academia, and other organizations and individuals. During an audit, CBs shall identify the full range of stakeholders involved and ensure their inclusion in the process.
16	8. Conformity with GSTC Requirements	8.5.15.1 At each audit, the CB shall use an audit checklist/evaluation tool which includes all criteria and indicators of the Reference Standard and requires the completion, for each criterion, of the auditor's findings (conformity, non-conformity, or not assessed or not applicable), based on evidence obtained from the audit process.	Suggest adding the word 'full' as some periodic audits may be purposefully more limited. 8.5.15.1 At each full audit, the CB shall use an audit checklist/evaluation tool which includes all criteria and indicators of the Reference Standard and requires the completion, for each criterion, of the auditor's findings (conformity, non-conformity, or not assessed or not applicable), based on evidence obtained from the audit process.	Thank you for your comment. We have revised it as follows: 8.5.15.1 At each full audit, the CB shall use an audit checklist/evaluation tool which includes all criteria and indicators of the Reference Standard and requires the completion, for each criterion, of the auditor's findings (conformity, non-conformity, or not assessed or not applicable), based on evidence obtained from the audit process.

| 17 | 8. Conformity with GSTC Requirements | NOTE: The CB shall use the audit checklist/evaluation tool template provided by the GSTC once this template is published. Before publishing the GSTC tool template, the CB shall create and use a checklist or evaluation tool. | It will be important to obtain the right balance between GSTC guidance and the CAB's professional processes here. Accreditation is the assessment and attestation of the competence of a CAB to carry out conformity assessment activities. It should be up to the CAB to develop and use the checklist (which is at least part of the evaluation tools required by ISO 17065) that fits its needs, experience and context and allows it to assess compliance with the reference standard. | Thank you for your comment. We have revised it as follows:

NOTE: The audit checklist/evaluation tool created by the CB shall be used.

The note was reviewed following the Accreditation Panel's revision and, upon further deliberation, was removed from the manual. |
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| 18 | 8. Conformity with GSTC Requirements | 8.5.15.4 Each CB before performing audits shall define the level of risk of the client through carrying out a risk assessment. Risk assessments are applicable to all types of clients. The outcome of the risk assessment shall determine the duration and the focus of the audit and is additional to the elements described in Clause 8.5.15.6. | We agree with the need for careful pre-planning of the audit, including an assessment of risk, in determining the allocation of time and focus of the process. However, while this should be stated as a requirement, we are concerned that the identification of specific risk parameters, with consequences for audit, identified here and in subsequent paragraphs, is too rigid. | Thank you for your comment. Although we are not sure what kind of change is expected here, we favor keeping it as we have in the Industry Manual. |
| 19 | 8. Conformity with GSTC Requirements | 8.5.15.6.1 The likelihood and consequences of environmental, social, economic, and cultural impacts. CBs shall include the following conditions for their analysis of impact likelihood and consequences.
a. Climate Change Performance Index (CCPI) Rating | Not sure how well this general country level index is related to individual destination management risk. | Thank you for your comment. Unfortunately, there is no smaller scale of destination-level index. That's why we go with the country level. However, we allow the CB to justify the case if they apply the index differently or not. (8.5.15.8.2) |
| 20 | 8. Conformity with GSTC Requirements | b. Internal and national protected area: UNESCO World Heritage List, IUCN Protected Areas Category I to IV, List of Wetlands of International Importance (Ramsar List) | Other forms of designation, types of habitat and socio-cultural identity could apply. However, none should be seen as an automatic and unqualified determinant of risk and audit. See also comment later. | Thank you for your comment. Since these are also used in the Industry Manual, we will keep them for now. |

21	8. Conformity with GSTC Requirements	8.5.15.6.3 The volume of visitors compared to the population.	This is an interesting and relevant consideration, which may affect the sustainability management challenge. However, a more direct consideration of the size of destination and the management operation could be used in determining audit requirements.	Thank you for your comment. We argue that without a heavy population or visitors, the size of the destination may not pose a challenge in terms of tourism management. Therefore, we want to emphasize "heavy population" and keep it for now.
22	8. Conformity with GSTC Requirements	8.5.15.7 CBs may consider other secondary data and define risk level based on the following: 8.5.15.7.1 Media monitoring checks of the destination (news classified as 'negative' will be prioritized when reviewing many overall results) 8.5.15.7.2 Any other information gathered through online searches, social media, or networks 8.5.15.7 .3 Any other relevant information already within the knowledge of the CB personnel.	Agree that specific evidence of potential poor management may be relevant to risk and the approach required. However, the practicability of the checking outlined here needs to be considered.	Thank you for your comment. We will revise it if necessary, along with the public consultation. For now, we will keep it.
23	8. Conformity with GSTC Requirements	c. When it has a protected area listed as a UNESCO World Heritage, IUCN Protected Areas Category I to IV, or Wetlands of International Importance (Ramsar).	In some cases, the existence of a designated protected area could mean the existence of better management and lower risk from negative impact..	Thank you for your valuable insights. However, UNESCO sites tend to have a higher possibility of a significant number of visitors, and higher-level IUCN-protected areas are more vulnerable. For now, we will keep it the same.

24	8. Conformity with GSTC Requirements	8.5.15.9 CBs shall develop documented procedures for determining the audit time in conformity with the audit frequency and duration. 8.5.15.10 Audit duration: 8.5.15.10.1 Audit duration shall be determined based on the risk analysis.	We fully agree that the CB needs to set out its basis and procedures for determining audit requirements for different situations. This should reflect, for example, the size and complexity of the destination and the management body etc. However, we are not sure that a pre-determined basis for this needs to be established by GSTC, as many different factors may apply in different cases. We also feel that a CB is best paced to identify risk and requirements for second and subsequent audits (type, frequency, duration, focus) based on the experience and outcome of the initial audit, and this should be recognised in the manual.	Thank you for your comment; it can be another requirement. Based on the risk analysis, CBs usually develop their own risk assessment approaches.
25	8. Conformity with GSTC Requirements	8.5.22.1 Surveillance activities shall be established in the audit program and shall include periodic on-site audits to assure ongoing validity of the demonstration of fulfilment of the Reference Standard requirements.	We understand the need for CBs to identify and deliver surveillance. However, it is important that this is deliverable and does not exceed what is necessary. A combination of on-site and remote auditing and verifiable reporting may be considered. The experience and views of existing CBs is very important in considering these requirements,	Thank you for your comment; since it concerns CB's audit rather than our assessment, we will keep it for now.
26	10. Auditor Qualifications, Knowledge and Skills	Education and Work Experience	It will be important to get clear feedback from CBs and others in the field about what has proved to be necessary as well as the availability of human resources to meet the specified requirements.	Thank you for your comment and for the comment about public consultation. We will reconsider it, but for now, we will keep it.
27	10. Auditor Qualifications, Knowledge and Skills	10.7.3 Audit experience: at least 20 audits in the hospitality, tourism industry, environmental management, or social sector. Audits should be completed within the previous 3 consecutive years.	Seems challenging. Consider other levels, e.g. 7 audits/20 days, in the last 3 to 5 years.	Thank you for your comment. There will be enough time to comply, as there will be a transition period after the Manual is announced. It appears that the certification world is busy, and it doesn't seem like the COVID-19 period.
28	10. Auditor Qualifications, Knowledge and Skills	10.7.4 GSTC Audit experience: at least 10 audits against GSTC Industry Criteria or a GSTC-Recognized Standard within the previous 3 consecutive years.	10 audits seems a lot	Thank you for your comment, but this requirement level has been intentionally set. However, we may need to change it if the stakeholders find it too difficult to satisfy.

29	10. Auditor Qualifications, Knowledge and Skills	10.7.5.1 If there is no traineeship opportunity, the auditor shall conduct 10 mock audits and the mock audit reports shall be evaluated by the CB.	Requirement of 10 mock audits seems excessive. Surely any learning and basis for assessment should be obtainable after 5 of them.	Thank you for your comment, but this requirement level has been intentionally set. We may need to change it if the stakeholders also find it too difficult to satisfy.
30	10. Auditor Qualifications, Knowledge and Skills	10.9.2.2.2 Completed at least 30 audits against GSTC Industry Criteria or a GSTC-Recognized Standard within the previous 3 consecutive years and completed 10 destination mock audits and evaluated by a GSTC Accredited CB.	This seems an unrealistic amount.	Thank you for your comment, but this level of requirement has been intentionally set. We may need to change it if the stakeholders find it too difficult to satisfy.
31	10. Auditor Qualifications, Knowledge and Skills	10.9.4 GSTC Training Sanctions: 10.9.4.1 GSTC may sanction those who cheat during the test. For auditors, GSTC may issue a 2-year sanction prohibiting them from participating in GSTC Auditor Training. 10.9.4.2 If the auditor is again caught cheating on the second chance, he or she shall be prohibited from attending GSTC Auditor Training.	We wonder whether this reference to cheating is necessary. It perhaps rather demeans the auditor profession!	Thank you for your comment, but we argue that there should be sanctions against cheating. Therefore, we have decided to keep it.
32	12. Eligibility for Destination Certification and Steps	12.1.1 The options for the destinations take a step-by-step approach. Option 1 with three steps. 12.1.1.1 Step 1. Approved Destination Certification Candidacy status by the GSTC. 12.1.1.2 Step 2. Verified as a destination with a Sustainable Management System (SMS) (hereafter, GSTC SMS Verified Destination). 12.1.1.3 Step 3. Certified as a sustainable destination (hereafter, GSTC Certified Destination).	This new 3-step approach needs careful consideration. We understand and welcome the concept of a journey by destinations/DMOs towards ever better management. However we believe that the introduction of two new named status levels for destinations (candidate, SMS) may be confusing in the marketplace [generally GSTC has been reducing labels, such as recognised, approved]. Also, we question whether it is necessary, as any destination seeking certification would need to have an informed DMO and a functioning SMS in place anyway.	Thanks for the comment; we agree that we should be careful while communicating with CBs and destinations to prevent confusion during these steps, and we will keep this clause.

33	12. Eligibility for Destination Certification and Steps	12.1.1. The options for the destinations take a step-by-step approach. 12.1.1.1 Option 1 with three steps. 12.1.1.1.1 Step 1. Approved Destination Certification Candidacy status by the GSTC. 12.1.1.1.2 Step 2. Verified as a destination with a Sustainable Management System (SMS) (hereafter, GSTC SMS Verified Destination). 12.1.1.1.3 Step 3. Certified as a sustainable destination (hereafter, GSTC Certified Destination).	The responsibility for this verification should be clarified. Presumably this rests with the CB, based on the submission of documentation as set out in 1.2.2.2?	Thank you for your comment. We have revised it as below: 12.1.1.1.2 Step 2. Verified as a destination with a Sustainable Management System (SMS) by the CB (hereafter, GSTC SMS Verified Destination).
34	12. Eligibility for Destination Certification and Steps	12.2.2.1 Introduction of Destination Management Organization ... b. Demonstrate the organization has been in place for a minimum of 5 consecutive years. ...	DMO clearly needs to be fully functioning, but is 5 years a necessary requirement?	Thank you for your comment. We have decided to see comments from public consultation.
35	13. Ineligibility for Destination Certification	13.2 The CB shall require the destination to declare any cases convicted of forced labor or environmental violations in the destination during the application and certification periods.	We are not sure that this requirement is deliverable or necessary.	Thank you for your feedback. Ensuring evidence of violations could help hold the candidate fully accountable for ethical requirements.

36	15. Requirements for Destination Certification	Requirements for Certified tourism businesses, Renewable energy, and Green transport	This is a very specific new requirement additional to the general statements of the GSTC-D criteria. We question whether it is right to introduce specific quantification of this kind within the accreditation process. In general, it is not considered good practice for certification rules to introduce performance requirements that are not in the reference standard. Careful consideration should be given to whether the requirements specified here are desirable and achievable, and also why these particular elements have been selected. This needs effective dialogue with destinations and CBs already engaged in the process.	Thank you for your feedback. We decided to wait for comments from public consultation; for now, we will keep it.
37	15. Requirements for Destination Certification	15.3 Certified Tourism Businesses. At least 20% of the following tourism businesses have been certified to international or national sustainability standards, which include the GSTC Criteria.	We question whether this is realistic.	Thank you for your comment. We think accommodation facilities can obtain various ISO certifications before or even the GSTC Certification. Therefore we will keep it.
38	15. Requirements for Destination Certification	15.3.1 The international or national sustainability standards are about social, cultural, or environmental sustainability.	This is confusing	Thank you for your comment, we have revised it as below:

The international or national sustainability standards shall cover social, cultural, or environmental aspects of sustainability. |

39	15. Requirements for Destination Certification	15.3.4 The percentage of the certified tourism businesses includes: 15.3.4.1 The percentage of GSTC-Certified hotels/accommodations; 15.3.4.2 The percentage of GSTC-Certified tour operators; 15.3.4.3 The percentage of GSTC-Certified MICE businesses; 15.3.4.4 The percentage of GSTC-Certified attractions; 15.3.4.5 The percentage of tourism businesses to the GSTC-Recognized standards that are used by GSTC-Accredited CBs; and 15.3.4.6 The percentage of tourism businesses certified to other international or national standards described in clauses 15.3.1 and 15.3.2.	The possibility achieving and measuring this requirement needs very careful thought. For example, there may be practical difficulties in identifying and counting all the businesses (e.g. small accommodations), to enable this calculation to be made.	Thank you for your comment, but the GSTC Destination Standard also requires it at A.4. Therefore, we will keep it.
40	15. Requirements for Destination Certification	15.3.5 CBs shall justify if they certify destinations having less than 15% tourism businesses.	How does this relate to the figure in 15.3 above?	Thank you for your comment, we have corrected it as below: 15.3.5 CBs shall justify if they certify destinations having less than 15% tourism businesses.
41	15. Requirements for Destination Certification	15.4.1 Renewable energy supply accounts for at least 10% of the total.	This may be hard to measure at a destination level as destinations are usually not in control of energy supply or usage (OK for a country as the overall supplier or for an individual business as a specific consumer).	Thank you for your comment, but we will keep it since we think that renewable energy options are accessible.
42		15.5.1.1 At least 10% of rental cars and tour buses use green transport.	Could be hard to define and measure - e.g. 'tour buses' locally based or incoming	Thank you for your feedback. We will also wait for comments from the public consultation; therefore, for now, we will keep it.

| 43 | 15. Requirements for Destination Certification | 15.6 The CBs shall have documented procedures for determining the sampling process and audit duration based on the risk assessment considering the following factors:
15.6.1 The size of the DMO;
15.6.2 Tourism contribution to the destination economy;
15.6.3 The ratio of the volume of visitors compared to the number of residents;
15.6.4 The percentage of residents involved in tourism-related businesses;
15.6.5 The complexity of tourism businesses in terms of numbers, types, and size;
15.6.6 Culturally significant and/or sensitive tangible intangible heritage, such as UNESCO World Heritage sites, archaeological sites, national or local heritage, and/or Indigenous communities; and
15.6.7 Environmentally important and/or vulnerable sites include locally, nationally, or internationally protected areas, sites vulnerable to climate change, high biodiversity ecosystems, etc. | Some of the factors listed here are hard to measure. While documented procedures are necessary, the sampling (and duration) requirements should mainly reflect the size of the destination and the DMO and any complexities arising from individual circumstances, considering tourism and any wider related destination management functions affecting sustainability. | Thank you for your valuable insights, but we disagree that it is hard. We think that the public sector has those data and should have them if it claims to be a sustainable destination. Therefore, we will keep it. |
| 44 | 15. Requirements for Destination Certification | 15.6.4 The percentage of residents involved in tourism-related businesses; | This is particularly hard to measure. | Thank you for your comments; the public sector possesses all the economic data and is not too hard to measure. However, the categorization of tourism-related businesses may differ from destination to destination. For now, we have decided to keep it. |

A.2 Public Consultation

This public consultation, which lasted 100 days, was disseminated through various media channels. It engaged certification bodies, including GSTC-accredited Certification Bodies, as well as stakeholders from the tourism industry, other sectors, and international organizations.

Section/Clause from previous drafts	Comments Received	GSTC Analysis	Final Version
PART I	GSTC aims to continually increase the percentage of schemes that are accredited to certify to the GSTC Criteria or the GSTC-Recognized standards . - Longevity of this manual is recognized not being cut? Same preamble as hotels and tour operators. Should be distinct to destinations and reflective of sustainable destinations. Background: The Need for Sustainability in Tourism – talks to businesses rather than taking a destination based approach. Page 9 references UNWTO – now UN Tourism – should reflect actual name.	Thank you for your comment, the clause has been revised.	The PART: I has been reviewed and revised along with the changes from the UNWTO to UN Tourism
PART II	The GSTC-endorsed National Accreditation Body (NAB) shall administer accreditation in the mutually agreed-upon countries, including EU countries. How will the GSTC decide which NABs to endorse? Surely the country mutual recognition means that by default all NABs should be accepted? The GSTC-endorsed NAB shall administer complaints, appeals, and disputes related to the accreditation or certification process in the mutually agreed-upon countries, including EU countries. What about complaints regarding GSTC?	Thank you for your comment, the clause has been revised.	3.1. The GSTC shall administer the accreditation for Certification Bodies (CBs) for Destination certification. However, the accreditation of CBs located in the mutually agreed countries, including the countries inside of the European Union (EU), shall be administered by the GSTC-Endorsed National Accreditation Body (NAB). 3.2. Certification Bodies shall submit their relevant complaints and appeals against GSTC's activities in accordance with GSTC Grievance Procedure for Accreditation.
PART II Page 16	Multiple typos on page 16	Thank you for your comment, the clauses have been revised.	4.1.1. Gain accreditation from GSTC or by the GSTC-Endorsed NAB in mutually agreed-upon countries, including EU countries;

			4.3. For initial GSTC accreditation, CBs shall demonstrate practical experience in operating its conformity assessment system. This includes having carried out at least one internal audit, one management review, and one full conformity assessment activity at least in the last 12 months prior to applying for GSTC accreditation.
4.3 The CB for initial GSTC accreditation shall have experience in the operation of its conformity assessment system, including at least one internal audit and management review conducted and at least one conformity assessment activity completed (including simulated conformity assessment).	Review of management by whom – is ISO a suitable proxy here of is GSTC expecting to fully review each CB? Timeframe for delivering this? This is very unclear	Thank you for your comment, the clauses have been revised.	GSTC's Response: The internal audit and management review shall be completed by the CB's top management, following ISO 17065:2012 requirements.

Revise:
4.3. For initial GSTC accreditation, CBs shall demonstrate practical experience in operating its conformity assessment system. This includes having carried out at least one internal audit, one management review, and one full conformity assessment activity at least in the last 12 months prior to applying for GSTC accreditation.

4.3.1. If a CB has not yet performed conformity assessments for actual clients, then the required conformity assessment activity can be simulated. A simulated conformity assessment involves carrying out the full certification process for an organization - from initially receiving the certification application through to potentially issuing a certificate. This allows the CBs to assess the effective application of its procedures.

4.4. The internal audit and management review shall be completed by the CB's top management, following ISO 17065:2012 (Clauses 8.5 and 8.6, respectively). |

			NOTE: Simulated conformity assessment implies that a conformity assessment activity has been completed following the CB's service procedures and in compliance with the Reference Standard from the start (e.g., submission of certification application) to the end (e.g., issuance of certificate), based on a virtual scenario for conformity assessment.
5.1.1. The GSTC accreditation service is limited to the certification granted to: 5.1.1.1. Tourism Destination. 5.1.1.2. GSTC-endorsed NAB provides the GSTC Accreditation service for Destination Certification in mutually agreed countries, including EU countries.	Super unclear what is meant by this.	Thank you for your comment, the clause has been revised.	5.1. The applicant CB shall specify the Reference Standard against which the certification will be granted:
5.1.2.3.3. The GSTC equivalent criteria and indicators in the GSTC-Recognized Standard shall be edited in the same order as the GSTC Criteria for efficient accreditation assessments.	The same order should not matter – a more logical approach that works for destinations is required. Is ''recognised ''status continuing.This seems to imply it will	Thank you for your comment. The clause has been deleted.	N/A
6.2.1. A CB shall certify using languages for which there is the GSTC Criteria or the GSTC-Recognized	So long as the translation is NAATI certified, why could it not be delivered in any language – providing auditor is also proficient	Thank you for your comment. However, we have considered the following points while revising the clauses.	6.2.1. The CBs shall conduct its audit processes in languages for which formal translations of the GSTC Destination Standard or a GSTC Recognized standard are available. Only GSTC-published

Standard formally translated in that language.		Consistency: Formal translations ensure uniformity in certification standards across languages. Quality control: GSTC maintains oversight on translations to prevent misinterpretations. Auditor proficiency: Language proficiency alone does not guarantee the correct implementation of standards. Uniformity among CBs: Mandating formal translations ensures consistent certification outcomes across accredited CBs. The translated versions should NOT be used for formal or technical purposes.	translations (for GSTC-D) or CB-produced translations created by accredited translators (for GSTC-D and/or Recognized standard) shall be used. 6.2.1.1. The audit team must be proficient in the language of the Reference Standard, as this will be used to conduct the audit process.
6.2.2. If a destination being audited speaks mainly another (local) language, the audit team may undertake the Audit accompanied by a capable translator (who shall not be a staff member of the destination management organization being audited).	The current formulation seems prohibitive to the option that the auditor speaks the local language, hence the suggested addition "or in the local language if the auditor has at least level C1 proficiency in that language"	Thank you for your comment; we have revised the clauses. Specific local languages may not have standardized proficiency levels. Therefore, engaging a local expert and translator will facilitate a more accurate and comprehensive understanding of the context.	6.2.2 When a local, regional, indigenous, or native language is predominantly or partially spoken at a destination, the audit team may carry out the audit process with the assistance of a local translator and/or someone fluent in that language. The translator must not be an employee of the DMO being audited, nor have any conflicts of interest with the auditee destination.
7.2. The GSTC shall give due notice, at least 90 days, of any changes to its requirements for accreditation. The GSTC takes into account the views expressed by interested parties before deciding on the precise form	90 days is not sufficient if changes are major. Clarity needed on those that are already underway and changes get implemented are they required to follow new or continue with old?	This manual will include a transition period to allow CBs adequate time to prepare for the changes. During this period, CBs are expected to update their processes and systems to align with the new requirements and inform their clients about the revised timeline and any changes that may impact their certification process. This approach ensures a smooth transition and minimizes disruption for all stakeholders.	7.2. The GSTC shall give at least 90 days' notice of any changes to its accreditation requirements. The GSTC takes into account the views expressed by interested parties before deciding on the precise form and effective date of the changes.

and effective date of the changes.			
7.4. The GSTC shall inform all applicants and the GSTC-Accredited CBs of any changes in the requirements of the GSTC Destination Criteria:	What gives the GSTC this authority – why is this not a consultative process?	The GSTC Standard is developed in accordance with the GSTC Standard Setting Manual v3.0, which aligns with the ISEAL Code of Good Practice for Sustainability Systems. These criteria undergo periodic revisions every few years, and the revision process includes two public consultations to allow input from all interested parties. For detailed information on the revision process, please refer to the GSTC Standard Setting Manual v3.0. The ongoing revision of the GSTC Criteria will include a public consultation process, during which all Certification Bodies (CBs) and relevant stakeholders will be notified about the consultation and any updates to the criteria. Additionally, the GSTC will communicate all information related to the requirements revisions, including transition details, through updates to the Accreditation Manual.	7.4. The GSTC shall inform all applicants and the GSTC-accredited CBs of any changes in the requirements of the GSTC Destination Standard:
8.1.1. The GSTC and the GSTC-endorsed NAB may further limit the technical or geographical scope of certification based on the justification provided or upon request by the CB.	Where is the authority to limit geographic scope of a commercial CB?	Thank you for the comment. Different countries have varying regulations regarding CBs' authority. For example, in China, CBs shall submit their CNCA as part of their legal registration to obtain approval to conduct business certification activities. GSTC Certification authorization is granted to CBs based on compliance with GSTC Accreditation requirements. If GSTC or a GSTC-endorsed National Accreditation Body (NAB) determines that a CB does not meet the qualifications to perform audits within specific technical or geographical scopes, by the accreditation requirements,	8.2.1. The GSTC and the GSTC-endorsed NAB may further limit the technical or geographical scope of certification based on the justification provided or upon request by the CB.

		these scopes may be restricted. Such decisions are not made personally but are strictly tied to the accreditation standards and requirements.	
8.5.2.1.1. Does not make or permit any misleading statement regarding its certification;	Does this clause relate to the GSTC too?	Thank you for the comment. This clause explicitly refers to the CB, which shall require in its Certification agreement that the client (DMOs, DMC, the organization responsible for the destination management system) does not make or allow any misleading statement about its certification.	8.3.1. The CBs shall, through legally enforceable arrangements, require that the certified client: 8.3.1.1. does not make or permit any misleading statements regarding its certification; 8.3.1.2. does not use or permit the use of a certification document or any part thereof in a misleading manner;
8.5.3. The GSTC Requirements to ISO 17065:2012 Clause 4.1.3: 8.5.3.1. Upon certification, the CB shall issue their client with the: 8.5.3.1.1. The GSTC Logo; and 8.5.3.1.2. The GSTC Logo Terms of Use; in accordance with the GSTC Logo Terms of Issuance.	Should not be mandatory, rather on client request.	Thank you for the comment. The GSTC is obligated to require CBs to deliver the logo and the terms of use to destination managers. Destinations may regulate the intensity of the logo's use as deemed appropriate (which is not regulated in this clause).	8.4.1. Upon certification, the CBs shall issue their client with: 8.4.1.1. GSTC Logo; and 8.4.1.2. GSTC Logo Terms of Use; in accordance with the GSTC Logo Terms of Issuance.
ISO 17065:2012 5.0 Structural requirements; 8.5.7. The CB shall comply with the requirements of ISO 17065:2012 Clause 5.0. ISO 17065:2012 6.0 Resource requirements; 8.5.8. The CB shall comply with the requirements of ISO 17065:2012 Clause 6.0. ISO 17065:2012 7.0	ISO standards sit behind a pay wall – if compliance is sought then identify what the clauses are.	Thank you for the comment; we have revised the clauses. With the introduction of the new Manual, compliance with ISO 17065 will become mandatory. The relevant requirements are detailed in the GSTC Destination Manual. ISO 17065 is a critical standard for Certification Bodies (CBs) involved in certification activities and deriving revenue from such services. Adherence to this standard ensures credibility, maintains trust, and upholds the integrity of the certification process.	For the revision, please see Clause 8 in the Manual.

Process Requirements; 8.5.9. The CB shall comply with the requirements of ISO 17065:2012 Clause 7.0.			
8.5.10. The GSTC Requirements to ISO 17065:2012 Clause 7.1.2: 8.5.10.1. The CB shall define the scope of the certification, specifying the boundary of destination that has been assessed against the Reference Standard: 8.5.10.1.1. During the five-year period, it is required that the scope outlined in the certification documentation accurately identifies any exclusions that fall outside the scope of the GSTC certification, if there are any. 8.5.10.2. When the Reference Standard is the GSTC Recognized Standard, the CB shall have legal authorization to provide auditing and certification services to the GSTC-Recognized Standard. 8.5.10.3. When a third party owns a	note contradicts previous statements about mandatory criteria.	Thank you for your comment. Relevant clauses have been revised.	8.7.1. The CBs shall define the scope of the certification, specifying the geographical coverage and the boundaries of the destination that have been subject to evaluation against the Reference Standard. 8.7.2. During the five-year accreditation period, the geographical scope and Reference Standard described in the certification documentation shall be adequately communicated. If the certified destination jointly advertises its GSTC certification along with such out-of-scope destinations, the advertising material shall clearly differentiate between those that are included within the scope of the GSTC certification and those that are not included. 8.7.3. When the Reference Standard is the GSTC-Recognized standard, the CBs shall have legal authorization to provide auditing and certification services to the GSTC-Recognized standard. 8.7.4. When a certification scheme is owned by a third party, the CBs shall have legal authorization to use the Reference Standard, marks and logos and any other intellectual property rights as well as other rules of the scheme. 8.7.5. All the requirements in the GSTC Standard-equivalent criteria or indicators of the GSTC-Recognized standard are mandatory and shall be assessed for conformity.

certification scheme, the CB shall have legal authorization to use the Reference Standard, marks and logos, and any other intellectual property rights and rules of the scheme. 8.5.10.4. All the requirements in the GSTC-Recognized Standard are mandatory and shall be assessed for conformity. NOTE: To be awarded GSTC-Recognized Standard not all the GSTC Criteria are mandatory. However, for a CB to become awarded GSTC-Accredited status, conformity with at least one of the criteria matching each of the GSTC Criteria shall be mandatory in order to demonstrate that all certified destinations and activities comply with all the GSTC Criteria.			
8.5.12.1. The CB shall define the scope of certification with the client by identifying the scope of the destination as per the following definition:	No definition provided	Thank you for your comment. We have defined "destination" and added it to the glossary document. The Destination Criteria offers the following definition: A destination has been defined by the World Tourism Organization (UNWTO) as: "A physical space with or without administrative and/or	N/A

		analytical boundaries in which a visitor can spend an overnight. It is the cluster (co-location) of products and services activities and experiences along the tourism value chain and a basic unit of tourism analysis. A destination incorporates various stakeholders and can network to form larger destinations".	
8.5.13.4 The certification cycle shall be 3 years, the audit program shall establish as a minimum, a surveillance audit every year and a recertification audit shall begin over the year prior to the expiration of certification.	Will this mean, in the 3-year cycle where recertification audit shall take place in the 3rd year, surveillance audits shall take place twice ? E.g. in month 13 and month 25; with the full recertification audit taking place in month 30, for example? We propose the following edit in formulation of this 8.5.13.4: " (...) every year and the recertification procedure shall start and be completed in the year prior to the expiration of certification." . Saying that " the audit shall begin over the year prior to expiration of certification", might lead to the assumption that the audit can start in month 35. With corrective actions, this will result in passing the 3-y validity and therefore formally removing the certification status.	Thank you for your comment. We have revised it.	8.10.4. The certification cycle shall be three years, and the audit program shall establish, as a minimum, a surveillance audit every year and a recertification audit that shall be conducted prior to the expiration of certification.
8.5.15.4 Each CB before performing audits shall define the level of risk of the client through carrying out a risk assessment. Risk assessments are applicable to all types of clients. The outcome of the risk assessment shall determine the duration and the focus of the audit and is additional to the	All the section related to risk assessment must be better defined. The categories used for RA resulted unclear. For example point 8.5.15.6.1 is unclear: how a destination (a entire province or city) can have itself some likelihood and consequences of environmental, social, economic, and cultural impacts. Additionally, this process is too closely linked to the individual procedures of certification bodies and should be more defined so that the individual procedures are more comparable	Thank you for your comment. The clause has been revised. The risk assessment shall be updated annually. The cycle spans three years, with an annual surveillance assessment required during the cycle period.	8.13. Risk assessment 8.13.1. CBs shall define the client's risk level through a risk assessment to determine audit frequency and duration.
	Does the risk need to be updated annually, at every 3-years cycle?		

elements described in Clause 8.5.15.6.	This will not meet the requirements of the Green Claims Directive.Destinations definitely need annual audit		
8.5.15 relies on visitor number and resident population data –	is this international, domestic and day? What if data is not available?	Thank you for the question. Certification Bodies shall justify which data they use and which are available.	N/A
8.5.15.6 CBs shall rely on the following three primary risk categories when conducting the risk assessment: 8.5.15.6.1 The likelihood and consequences of environmental, social, economic, and cultural impacts. CBs shall include the following conditions for their analysis of impact likelihood and consequences. a. Climate Change Performance Index (CCPI) Rating b. Internal and national protected area: UNESCO World Heritage List, IUCN Protected Areas Category I to IV, List of Wetlands of International Importance (Ramsar List) 8.5.15.6.2 The Rule of Law and Control of Corruption scores of the country.	The volume of visitors compared to the population: average annual?	Thank you for the comment. We have made revisions to enhance clarity.	8.13.2. Three primary risk factors that shall be considered by CBs when conducting the risk assessment are: a. The likelihood that the client's location and/or operations may cause negative environmental, social, economic, or cultural impacts, assessed based on: i. The Climate Change Performance Index (CCPI) Rating ii. The presence of the site within or near internationally and nationally protected areas, including: 1. UNESCO World Heritage Sites 2. IUCN Protected Areas Category I to IV; and 3. Wetlands of International Importance (Ramsar List) b. The Rule of Law index of the country in which the client operates. c. The volume of visitors during the high season compared to the population. *Note 1. UNESCO List: UNESCO provides a List of World Heritage in Danger. When the lists of sensitive areas are unavailable, the CBs should rely on the national legislation where the client is located to determine the sensitive areas.* *Note 2. Rule of Law index: World Justice Project provides updates to the Rule of Law Index.* *Note 3. Volume of visitors: The high season will be determined based on the tourism statistics for the past three years.*
	STB would like to suggest for GSTC's consideration that the risk categories be tied to the existing 4 segments of the GSTC-D criteria (Sustainable Management, Socio-Economic, Cultural and Environmental Sustainability), and that each segment be assessed as high or low risk. This approach would make it clearer for destinations to know which areas require higher level of focus. Subsequent audits of the destination can then be more targeted in monitoring progress for segments which are identified to be high risk. Additionally, if the volume of visitors compared to population is intended as a proxy for overcrowding, STB would like to suggest that urban tourism management is key to crowd control - hence, instead of just looking at the crowd size, we should consider how spaced out the visitorship is throughout the year and the measures put in place to manage crowds.	Thank you for your comment. We have revised it.	

8.5.15.6.3 The volume of visitors compared to the population.			
8.5.15.7 CBs may consider other secondary data and define risk level based on the following: 8.5.15.7.1 Media monitoring checks of the destination (news classified as 'negative' will be prioritized when reviewing many overall results) 8.5.15.7.2 Any other information gathered through online searches, social media, or networks 8.5.15.7.3 Any other relevant information already within the knowledge of the CB personnel.	STB suggests that CBs will need to verify media sources and conduct media monitoring on reputable sites, to ensure that the secondary data is credible.	Thank you for the suggestion. However, the present clause meets the commentary's expectations and allows the CBs to make their own justifications based on secondary data.	8.13.4. CBs may consider other secondary data and define risk level based on the following: a. Media monitoring about the destination. News related to the management, sustainable performance, and reputation of the destination may be closely monitored. b. Any other information gathered through online searches, social media, or networks. c. Any other relevant information already within the knowledge of the CB's personnel.
8.5.15.8 CBs shall consider the client as high or low risk based on the following conditions: 8.5.15.8.1 If any of the aspects listed in this clause apply, the client shall be considered as high risk: a. When negative environmental, social, economic, and cultural impacts have	Point a is very discretionary To reiterate the point raised under clause 8.5.15.6, STB suggests that the risk levels be tied to each of the 4 criteria categories. The respective risk rating can then determine focus areas for the audit. Eg. if the Sustainable Management is assessed to be low risk, to reduce focus in this area for the surveillance audit? This section can also make clear what are the implications if a client is categorised as high/low risk. 8.5.15.8.1a: Is there a metric to determine what is significant likelihood/consequences? Who	Thank you for the comment. While Point A may appear discretionary, it is designed to provide flexibility to the certification body, allowing it to adapt to specific circumstances while still maintaining the integrity of the process. Thank you for addressing this matter; 1. Risk Levels and Focus Areas for Audits: The risk classification framework provided by GSTC serves as the primary basis for assessment. However, CB can supplement this with additional risk assessments supported by a clear rationale.	8.13.2. Three primary risk factors that shall be considered by CBs when conducting the risk assessment are: a. The likelihood that the client's location and/or operations may cause negative environmental, social, economic, or cultural impacts, assessed based on: i. The Climate Change Performance Index (CCPI) Rating ii. The presence of the site within or near internationally and nationally protected areas, including: 1. UNESCO World Heritage Sites 2. IUCN Protected Areas Category I to IV; and

significant likelihood and consequences.
b. When the CCPI Rating is marked as 'Low' or 'Very low'.
c. When it has a protected area listed as a UNESCO World Heritage, IUCN Protected Areas Category I to IV, or Wetlands of International Importance (Ramsar).
d. When the Rule of Law and Control of Corruption scores of the country in which the client is located are below 60 points according to BSCI Countries' Risk Classification, the client shall be considered as high risk.
e. When the number of visitors in the previous fiscal year is more than three times the local population.
8.5.15.8.2 If the client falls under the above cases but is not classified as high risk, the CB shall provide a rationale.
8.5.15.8.3 If the three aspects listed in this clause apply, the client

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determines this - the client or CB? Without clear guidelines, there may not be consistency in assessment.

Additionally, the criteria for high risk and low risk are not mutually exclusive, so a destination can be classified as both - in which case, what are would the required follow-ups be by both the CB/destination?

The provisions in Subsection 8.5.15.8 for the certification bodies to determine risk are excessively prescriptive and do not allow for adaptation to specific contexts and application of the multiple risk provisions in the totality of circumstances. For example, if a destination has a UNESCO World Heritage site, or other site designated in 8.5.15.8.1, even if the other factors qualify as "low risk" per applying the factors in this same subsection, the client would need to be designated high risk. Application of the stated risk factors varies enough across contexts globally that Subsection 8.5.15.8.2 would need to invoked to such an extent as to render the earlier prescriptive provisions in 8.5.15.8 ineffectual as prescriptive requirements. Therefore we recommend GSTC remove the overly prescriptive language ("shall") in 8.5.15.8 and allow CBs to exercise appropriate discretion in applying the risk factors stated in 8.5.15.6-7.

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2. Implications of High/Low-Risk Categorization:
High and low-risk criteria are not mutually exclusive, meaning a destination could be classified into different categories. In such cases, the CB will evaluate the overall risk profile and determine the appropriate follow-up actions. GSTC guides risk assessment but ultimately leaves the decision-making to the CBs, ensuring flexibility to adapt to unique circumstances.
3. Determining Significant Likelihood/Consequences (8.5.15.8.1a):
Currently, there is no specific metric to determine significant likelihood or consequences. The CB makes this determination based on their professional judgment and the context of the assessment
4. CBs must determine audit duration, and our role is to assess whether the duration is/was appropriately calculated. There are so many different conditions/environments that it may not be possible to provide audit duration guidance, but we can provide factors they must consider.

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3. Wetlands of International Importance (Ramsar List)
b. The Rule of Law index of the country in which the client operates.
c. The volume of visitors during the high season compared to the population.
Note 1: UNESCO List: UNESCO provides a List of World Heritage in Danger. When the lists of sensitive areas are unavailable, the CBs should rely on the national legislation where the client is located to determine the sensitive areas.
Note 2: Rule of Law index: World Justice Project provides updates to the Rule of Law Index.
Note 3: Volume of visitors: The high season will be determined based on the tourism statistics for the past three years.

8.13.3. The client may be considered low risk if at least three aspects listed in this clause apply:
a. The Destination´s Climate Change Performance Index (CCPI) Rating is classified as High or Very High.
b. The destination's sensitive protected areas are conserved but not considered in danger by international conventions or national regulations;
c. The Rule of Law Index for the country where the client is located is 0.60 points or higher; and,
d. The volume of visitors during the high season does not exceed the total resident population.

8.13.4. CBs may consider other secondary data and define risk level based on the following:

may be considered low risk: a. When negative environmental, social, economic, and cultural impacts have minimal likelihood and consequences. b. When the CCPI Rating is marked as 'Very High'. c. When there is no national or international protected area. d. When the Rule of Law and Control of Corruption scores of the country in which the client operates are above 60 points according to BSCI Countries' Risk Classification. e. When the client population is less than or equal to 100,000 and the number of visitors for the previous fiscal year is the same or less than the population.			a. Media monitoring about the destination. News related to the management, sustainable performance, and reputation of the destination may be closely monitored. b. Any other information gathered through online searches, social media, or networks. c. Any other relevant information already within the knowledge of the CB's personnel.
8.5.16.2. 'The auditor shall undertake [stakeholder] interviews where there is significant doubt about the sufficiency, quality, or veracity of information supplied by a client'.	We think it's rather naïve and indicating disconnection from the reality of destination certification, to believe that destination sustainability information supplied by clients is in principle always complete in mentioning the challenges the destination faces. Stakeholder interviews are a pre-requisite for verifying destination sustainability and cannot be omitted, it will create disparity between CBs. We therefore request strongly to remove this clause.	Thank you for the suggestion; we have revised it to clarify.	8.11.5. The auditor shall conduct interviews with relevant stakeholders to assess the sustainability compliance of the destination and the performance of the management organization. The auditor shall conduct such interviews in each audit and especially when the information collected is considered insufficient or incomplete, lacking quality or veracity.

			Note: The relevant stakeholders to the destination's tourism development and management include tourism businesses, communities, civil societies, academia, DMO, and other organizations and individuals. During an audit, CBs shall identify the full range of stakeholders involved and ensure their inclusion in the process.
8.5.17.3 When minor non-conformities, the CB shall provide a 30-day term to be corrected. / 8.5.17.2. When major non-conformities have arisen, the CB shall provide a 90-day term to be corrected..	We don't think this division has added value to make in an Accreditation manual; if a destination reports minor and major CARs after 90 days in one go, what's the problem?	Thank you for your comment. If the nonconformity remains unresolved, the result may be a failure to achieve or suspending an existing certification. Sometimes, it could lead to further audit actions, such as follow-up audits or increased scrutiny, until the issue is satisfactorily addressed. Ultimately, unresolved nonconformities indicate that the client has not met the necessary standards, impacting their compliance status. Please find the new Clause for a better understanding of both Major and Minor NC.	8.16.2. When major nonconformities have been issued: 8.16.2.1. CBs shall provide a period of 90 days from the issue date for the closing of nonconformity. 8.16.2.2. For the closing to be accepted by the CBs, adequate root cause analysis, correction, corrective, and/or preventive action shall be provided by the client. 8.16.2.3. Evidence for correction and corrective actions shall be documented. 8.16.2.4. In case the closing is not sufficient, the CBs shall implement sanctions. 8.16.3. When minor nonconformities have been issued: 8.16.3.1. CBs shall provide a period of 90 days from the issue date for the closing of nonconformity. 8.16.3.2. For the closing to be accepted by CBs, adequate root cause analysis, correction, corrective, and/or preventive action shall be provided by the client. 8.16.3.3. Evidence for correction shall be documented. 8.16.3.4. Corrective actions shall be verified during the next audit. 8.16.3.5. In case the closing is not sufficient, the CB shall upgrade to major nonconformities and follow the procedure outlined in Clause 8.16.2.

8.5.19. The GSTC Requirements to ISO 17065:2012 Clause 7.6: 8.5.19.1. The CB shall confirm, prior to making a certification decision, that: 8.5.19.1.1. The information provided by the audit team is sufficient with respect to the certification requirements and the scope for certification. 8.5.19.1.2. It has reviewed, accepted, and verified the effectiveness of correction and/or corrective actions for all non conformities that represent: a. Failure to fulfil one or more requirements of the Reference Standard; or b. A situation that raises significant doubt about the ability of the client's sustainability management processes to achieve its intended outputs. 8.5.19.1.3. It has reviewed and accepted the client's planned correction and/or corrective action for any other non-conformities.	It is our interpretation is that – Certification may only be granted when Corrective Actions are evaluated as 'completed', regarding: ▪ A) non-conformity to the criteria ▪ B) A situation that raises significant doubt about the ability of the client's sustainability management processes to achieve its intendedoutputs. ▪ C) other non-conformities, but And thus, certification can only be granted if there is not a single tiny non-conformity to the criteria left. In our experience of destination certification, we see that a) this is not considered by other CBs; b) it is very challenging to comply with every word of the criteria. We propose to consider an extensive formulation of 'planned corrective actions', to be executed in the next 2 years, for a maximum amount of criteria, and for non-essential no conformities, as a valid basis for certification.	Thank you for your comment. The GSTC uses the interpretation from ISO 17065; the use of ISO 17065 in GSTC certification ensures a rigorous and standardized approach to evaluating conformity. Since certification is a significant achievement indicating excellence in sustainability practices, destinations must fully comply with all applicable standards. Any deviation or partial compliance would prevent certification awarding, as the process demands a comprehensive demonstration of the destination's commitment to sustainability. Full compliance underscores the credibility and integrity of the certification.	8.17.4. CBs shall confirm, prior to making a certification decision, that: 8.17.4.1. The information provided by the audit team is sufficient with respect to the certification requirements and the scope for certification. 8.17.4.2. It has reviewed, accepted, and verified the effectiveness of correction and/or corrective actions for all nonconformities that represent: a. Failure to fulfill one or more requirements of the Reference Standard; or b. A situation that raises significant doubt about the ability of the client's sustainability management processes to achieve its intended outputs. 8.17.4.3. It has reviewed and accepted the client's planned correction and/or corrective action for any other nonconformities.

8.5.22.1 Surveillance activities shall be established in the audit program and shall include periodic on-site audits to assure ongoing validity of the demonstration of fulfilment of the Reference Standard requirements.	Are these surveillance audits GSTC's own audits on the CB, or the CB's audits on the client?	Thank you for the comment. The accreditation manual is intended for Certification Bodies to apply when working with clients, whereas the accreditation procedure outlines the process from GSTC to the CBs. Therefore, the surveillance clause is for the ACB to the client.	8.19.1. Surveillance audits shall be established in the audit program and include periodic audits to assure ongoing validity of the demonstration of fulfillment of the Reference Standard requirements.
8.5.22.2 Surveillance audits shall be conducted once every year.	Are these audits done virtually if not on-site as per 8.5.22.3?	Thank you for the comment. The clause has been updated to enhance clarity and improve understanding.	8.19.4. Formats of Surveillance Audits 8.19.4.1. Surveillance audits may be performed on-site or in a hybrid format (a combination of on-site and remote) based on the client risk assessment by the CB and the characteristics of the stakeholders, sites, attractions, or other businesses the destination has. 8.19.4.2. For high-risk situations, on-site audits shall occur annually. 8.19.4.3. For low-risk or extremely low-risk clients, as determined by the CB's risk assessment, surveillance audits may be performed in a hybrid format. 8.19.4.4. In addition to the overall risk assessment, CBs may consider other relevant factors when determining the modality (on-site or hybrid) for conducting surveillance audits. These factors include but are not limited to nonconformities identified in previous audits and social, economic, cultural, or environmental changes in the client.
8.5.22.3 Surveillance audits shall be conducted on-site at least once every two years:	This implies that still, only certification can be granted if there is not a single non conformity left. I propose to issue a request to GSTC to consider an extensive formulation of 'planned corrective actions', to be executed in the next 2 years, for a maximum amount of criteria, and for	Thank you for the comment. The clause has been updated to enhance clarity and improve understanding.	8.19. Surveillance Audits 8.19.1. Surveillance audits shall be established in the audit program and include periodic audits to assure ongoing validity of the demonstration of fulfillment of the Reference Standard requirements.

8.5.22.3.1 For high-risk situations, on-site audits shall occur annually.	non-essential no-conformities, as a valid basis for certification. For low-risk destinations, can it pleas be possible to plan surveillance as follows: - month 12: remote surveillance audit - month 24: remote surveillance audit - month 30: on-site recertification audit Requiring that "Surveillance audits shall be conducted on-site at least once every two years" would otherwise mean the 2nd surveillance audit shall take place on-site; only 6 months ahead of the full on-site recertification audit. Stakeholders will wonder what's the use of being asked the same questions within 6 months; and it has little added value.		8.19.2. Surveillance audits shall be conducted annually. The first surveillance audit following initial certification shall be conducted no later than 12 months from the certification decision date. 8.19.3. Surveillance audits are not necessarily full sustainability management process audits. Surveillance audits may focus on key processes, a portion of the destination management organization, and/or sensitive issues. In the 3-year certification cycle, all requirements shall be covered. 8.19.4. Formats of Surveillance Audits 8.19.4.1. Surveillance audits may be performed on-site or in a hybrid format (a combination of on-site and remote) based on the client risk assessment by the CB and the characteristics of the stakeholders, sites, attractions, or other businesses the destination has. 8.19.4.2. For high-risk situations, on-site audits shall occur annually.
9.2.2. Personnel shall possess the knowledge and skills necessary to achieve the intended results of the roles they are expected to perform. Personnel shall possess generic knowledge and skills and shall also be expected to possess the discipline and sector-specific knowledge and skills described in this section.	Very heavy requirements for auditors. Lighter for CB which makes no sense from quality assurance sense. Light on tourism knowledge.	Thank you for your comment. The auditor qualification requirements were intentionally kept strict to ensure a rigorous certification process, and auditors must adhere to the standards outlined in the manual.	9.2.2. Personnel shall possess the knowledge and skills necessary to achieve the intended results of the roles they are expected to perform. Personnel shall possess generic knowledge and skills and shall also be expected to possess the discipline and sector-specific knowledge and skills described in this section.

10.7 Work and Audit experience: 10.7.1 Lead auditor qualification in ISO9001, ISO14001, SA8000, or other internationally recognized certification programs focusing on sustainability. 10.7.2 At least 3 years experience in the hospitality, tourism industry, environmental management, or social sector. 10.7.3 Audit experience: at least 20 audits in the hospitality, tourism industry, environmental management, or social sector. Audits should be completed within the previous 3 consecutive years. 10.7.4 GSTC Audit experience: at least 10 audits against GSTC Industry Criteria or a GSTC-Recognized Standard within the previous 3 consecutive years. 10.7.5 An auditor shall undergo a supervised training period that involves at least 5 audits as a trainee auditor to gain practical experience in	It is very difficult for the items I have marked in red below (10.7.2., 10.7.3., 10.7.5., 10.7.5.1.) to be met by any certification body or to fulfill these requirements. If we want to increase the number of destination auditors in the world, these requirements need to be made a little easier. It is easy to write the requirements in writing, but it seems very difficult for those of us who will implement it to train or find auditors who will meet these requirements . Appointing the auditor should be a little easier at the beginning, and then the requirements can be made heavier for monitoring and improvement of the auditor performances. Note:It is easy to write the conditions in writing, but it seems very difficult for those of us who will implement it to train or find auditors who will meet these conditions. Appointing the auditor should be a little easier at the beginning, and then the conditions can be made heavier for monitoring and improvement. It is easy to write the conditions in writing, but it seems very difficult for those of us who will implement it to train or find auditors who will meet these conditions. Appointing the auditor should be a little easier at the beginning, and then the conditions can be made heavier for monitoring and improvement. There is no need to have experience working in the tourism sector for this. Thanks	Thank you for the suggestion, the requirements have been revised.	10.7. Work and Audit experience: 10.7.1. Lead auditor qualification in any internationally recognized certification programs (such as IRCA, ASQ, etc.) in sectors relevant to tourism; or; 10.7.2. At least 2 years of experience in the hospitality tourism industry, environmental management, or social sector.
	10.7.1 is very restrictive and "other internationally recognized certification programs" must be better defined 10.7.2 At least 3 years experience: is very restrictive. Extremely difficult to qualif auditor with this limitation		

audit against GSTC Destination Criteria. 10.7.5.1 If there is no traineeship opportunity, the auditor shall conduct 10 mock audits and the mock audit reports shall be evaluated by the CB. 10.7.5.2 Evidence for no traineeship opportunity shall be documented.	10.7.3 and 10.7.4 again very restrictive. With this new accred manual is impossibile to qualify new auditors		
	10.7.3 + 10.7.4 is very challenging, almost impossible 10.7.5: 5 audits as trainee auditor against whatever standard?		
	10.7.2: Required tourism experience is reduced from 5 years to 3 years, which is good in terms of lowering barriers to entry. For 10.7.2 and 10.7.3., rather than "or", suggest that auditors should have experience in 2 or more of the specified sectors. Having experience in just 1 sector alone does not inspire confidence that the auditor is able and has the relevant knowledge to audit the GSTC Criteria which cuts across so many sectors. 10.7.3: Audit experience is a new requirement which is good to ensure adequate auditor capabilities. For 10.7.4, does this create significant barrier to entry for auditors who have no GSTC audit experience?		
	Auditor qualifications – expecting 10 mock audits before qualifying is impractical and unnecessary		
	10. 7 - In general, it's not clear what of the requirements are AND ; and what is OR (are the requirements cumulative or can 5 destination audits replace 20 audits in the hospitality industry? - In general , auditors should have a lot more in-depth knowledge about destination assets and management processes, especially related to risks, like coastal and water erosion, coastal sedimentary and geomorphological processes in		

	sedimentary coastal and riverine environments, river flood risk, forest management in relation to fire risk, social and DEI issues. Or is this covered in the GSTC-Destination Auditor training? 10.7.1. -> As per Accreditation manual V1.2, this requirement can be replaced by demonstrated experience in developing or operating a sustainable tourism certification program 10.7.3. -> this is beyond what's practically possible or necessary for doing good audits 10.7.4. -> unclear if this can replace 10.7.3.; still impossible 10.7.5. -> severe over-requirement for sustainable destination management experts; doesn't need more than 1 or 2 trainee auditor experiences. For auditors novice to the field of tourism, this shall indeed apply.		
	The auditor work experience requirements stated in Subsection 10.7.3 (minimum 20 audits within the prior 3 consecutive years in the hospitality, tourism industry, environmental management, or social sector), 10.7.4 (minimum 10 audits against the GSTC Industry Criteria or a GSTC-Recognized standard in the previous 3 consecutive years), 10.7.5 (minimum 5 audits as a trainee auditor against the GSTC Destination Criteria, or 10 mock audits) are likely excessive.		
10.8 Training on Auditing: 10.8.1 Training on auditing by training organizations relevant to non-tourism standards. The auditor shall have successfully completed training on audit techniques and practices. The GSTC accepts one of the formal training such as	10.8.1: The phrase "Training on auditing by training organizations relevant to non-tourism standards" reads as confusing. A definition of "non-tourism standards" would be appreciated for consistent understanding. 10.8: STB appreciates the ISO standards required for training, but would caution against setting too restrictive standards, as it may reduce barrier to entry for CBs.	Thank you for the suggestion, the clauses have been revised for a clear understanding.	10.8. Training on Auditing: 10.8.1. The auditor shall complete the following either via online or offline, and CBs shall document the auditor qualification, including the evidence of the training below: 10.8.1.1. Audit techniques and practices based on ISO19011. 10.8.1.2. Auditing to the Reference Standard(s) for GSTC Certification.
	General: unclear of the requirements are cumulative (AND) or mutually exclusive (OR)		

ISO 9001 quality management system standards, ISO 14001 environmental management systems, or other ISO standards or other relevant standards, provided by internationally and nationally recognized training organizations to fulfil this requirement; or 10.8.2 Training on auditing by organizations relevant to tourism standards. The auditor shall have successfully completed training with a minimum of the following areas via online or offline: 10.8.2.1 Quality and Environmental Management System relevant to ISO 9001 and 14001; 10.8.2.2 Audit techniques and practices based on ISO 19011; 10.8.2.3 Stakeholder consultation: ability to consult with tourism businesses, regulatory agencies, industry groups, local community members, and any indigenous stakeholders; and			

10.8.2.4 Management of environmental, economic, and socio-cultural issues applied to the tourism sector.			
10.9. The auditor shall successfully complete the GSTC's Training for Auditors requirements.	What is meant by "successfully complete the GSTC's Training for Auditors requirements" ; complete the training or fulfil the requirements? please re-word.	Thank you for the suggestion, the clause has been revised for a clear understanding.	10.9.1. The auditor shall successfully complete the GSTC Auditor Training. NOTE: This shall be "GSTC Auditor Training" distinct from other GSTC sustainable tourism training programs for other tourism stakeholders:
10.9.1. Auditors shall attend Modules A, B, C, and D. Completion of these are sufficient for auditing the Destination.	does this mean the other training requirements are exempted?		10.9.1.1. Auditors shall attend Modules A, B, C, and D.
10.9.2 Auditors satisfying the following requirements shall only attend Module A via online or offline as a mandatory training course: 10.9.2.1 Tourism work experience 10.9.2.1.1 Having at least 3 years of work experience in tourism certification; or 10.9.2.1.2 10 years of work experience in tourism destination management as a staff member, consultant, or professional in tourism-related organizations such as	It is very difficult for the items I have marked in red below (10.9.2.1.1, 10.9.2.1.2, 10.9.2.1, 10.9.2.2) to be met by any certification body or to fulfill these requirements. If we want to increase the number of destination auditors in the world, these requirements need to be made a little easier. It is easy to write the requirements in writing, but it seems very difficult for those of us who will implement it to train or find auditors who will meet these requirements . Appointing the auditor should be a little easier at the beginning, and then the requirements can be made heavier for monitoring and improvement of the auditor performances. Note:It is easy to write the conditions in writing, but it seems very difficult for those of us who will implement it to train or find auditors who will meet these conditions. Appointing the auditor should be a little easier at the beginning, and	The requirements have been reviewed and modified. Some of the changes respond to comments.	10.9.1.2. Auditors satisfying the following requirements shall only attend Module A either online or offline as a mandatory training course: 10.9.1.2.1. Having over 3 years of work experience in tourism certification; and 10.9.1.2.2. Completed at least 5 audits of Destination against a GSTC-Recognized standard or the GSTC Destination Standard completed within the previous three (3) consecutive years. 10.9.1.2.3. If some or all of the 5 audits were completed prior to the GSTC's Recognition of the standard, the decision to accept those audits will be based on how similar the standard was before and after GSTC's Recognition. The final decision lies solely with the GSTC and is at GSTC's discretion. Note: The outline of the content of the GSTC Auditor Training course is presented in

public authorities, academic tourism departments, community groups, and so on. 10.9.2.2 Tourism audit experience 10.9.2.1 Completed at least 5 audits of Destination against GSTC Criteria or a GSTC-Recognized Standard completed within the previous 3 consecutive years; or 10.9.2.2 Completed at least 30 audits against GSTC Industry Criteria or a GSTC-Recognized Standard within the previous 3 consecutive years and completed 10 destination mock audits and evaluated by a GSTC Accredited CB.	then the conditions can be made heavier for monitoring and improvement. There is no need to have experience working in the tourism sector for this. For 10.9.2.1.1 and 10.9.0.1.2 are these cumulative requirements or exclusive?		Annex B. Questions on GSTC Auditor Training should be directed to the GSTC.
10.9.2.2.1. Completed at least 5 audits of Destination against GSTC Criteria or a GSTC-Recognized Standard completed within the previous 3 consecutive years;	completion of 3 audits should be sufficient	Thank you for your suggestion. However, we believe a strict approach is required to maintain the rigor and integrity of the process.	10.9.1.2.2. Completed at least 5 audits of Destination against a GSTC-Recognized standard or the GSTC Destination Standard completed within the previous three (3) consecutive years.
10.9.3 Evaluation of the GSTC Training for Auditors. Auditors shall successfully pass the approved GSTC's Training for Auditors	GSTC training for auditors should be organized with an annual calendar to allow for organization.	Thank you for your suggestion. Following the manual's release, GSTC will offer additional training opportunities for destination auditors to ensure comprehensive understanding and effective implementation.	10.9.2. Evaluation of the GSTC Auditor Training. Auditors shall successfully pass the approved GSTC Auditor Training evaluation, which is divided into online written exam and field performance test evaluations:

evaluation, which is divided into online and field evaluations: 10.9.3.1 Online evaluation. The passing mark for the written exam on the contents and application of the GSTC Criteria shall be 85%+. The exam may be re-taken once, with the same requirement of 85%+ passing mark. If failed a 2nd time, the entire training course shall be repeated prior to additional testing. 10.9.3.2 Field evaluation. Passing marks for the field performance test on the ability to apply the GSTC Criteria and Indicators to the field and the audit skills is above 75% achievement. In the case of failure to pass the field performance test, the auditor shall satisfy the GSTC requirements for the completion of training.			10.9.2.1. Online evaluation. The passing marks for the written exam on the contents and application of the GSTC Destination Standard shall be 85%+. The exam may be re-taken once, with the same requirement of 85%+ passing marks. If failed a second time, the entire training course shall be repeated prior to additional testing. 10.9.2.2. Field evaluation. Passing marks for the field performance test on the ability to apply the GSTC Destination Standard and Indicators to the field and the audit skills shall be 75%+. In the case of failure to pass the field performance test, the auditor shall satisfy the GSTC requirements for the completion of training. Note: The GSTC will share the requirements for the auditors who failed the field evaluation in a separate document.
10.9.4 GSTC Training Sanctions: 10.9.4.1 The GSTC may sanction those who cheat during the test. For auditors, GSTC may issue a 2-year sanction	Clause re auditors ''Cheating'' in tests is unprofessional Mentioning these sanctions looks really odd in the frame of this accreditation manual. This whole section has very little to do with the normaltive reference for accreditation..	Thank you for your suggestion. This part has been moved to the Annex B.	Please see "GSTC Auditor Training Sanction" in the Manual Annex B.

prohibiting them from participating in GSTC Auditor Training. 10.9.4.2 If the auditor is again caught cheating on the second chance, he or she shall be prohibited from attending GSTC Auditor Training.			
10.10 The CB shall determine whether or not personnel are competent to undertake audits, review audit reports, and make certification decisions in each country covered by its accreditation scope, considering that there may be significantly different regulatory, cultural, and language issues.	Where is this coming from? What does it mean in the context of the previous requirements?	There is no change from the previous requirement. CBs remain responsible for ensuring, documenting, and monitoring auditors' qualifications, as they have done in the past.	10.10. The CB shall determine whether or not personnel are competent to undertake audits, review audit reports, and make certification decisions in each country covered by its accreditation scope, considering that there may be significantly different regulatory, cultural, and language issues.
10.11 Auditors whose accreditation scope includes the certification with a GSTC-Recognized Standard shall be trained on that full standard. This is not included in the GSTC Auditor Training and shall be provided by the Standard Owner or the CB.	What is 'accreditation scope' ? Decide on a wording for this auditor qualification status and use it consistently (add to glossary)	The requirements have been reviewed and modified. Some of the changes respond to comments.	10.11 Auditors auditing against a GSTC-Recognized standard shall receive specific training on the interpretation, use and application of that standard. This training shall be provided by the Standard Owner or the CB as such content is not part of the GSTC Auditor Training.
10.14. Auditors shall attend follow-up	Is this free of charge?	Thank you for your comment. Follow-up trainings are not provided free of charge,	10.14. Auditors shall attend follow-up training organized by the GSTC whenever

training organized by the GSTC whenever changes are made to the GSTC Criteria.		and all CBs and independent auditors will be duly informed accordingly.	changes are made to the GSTC Destination Standard.
10.16.2. Revised GSTC Criteria Examination. Approved Auditors shall pass an examination within six months of the issue of revised GSTC Criteria or certification requirements to sustain competence. The GSTC shall manage and communicate the type of examination (e.g., online, field performance, or both).	Unnecessarily onerous and costly,why would you need to do an infield exam?	Thank you for the comment. The clause has been updated to enhance clarity and improve understanding.	10.16.2. Revised GSTC Destination Standard Examination. Approved Auditors shall pass an examination within six months of the issue of revised GSTC Destination Standard or certification requirements. The GSTC shall manage and communicate the type of examination required (e.g., online, field performance, or both) to assess competency, as well as to provide value and benefit to CBs and independent auditors.
12.1 GSTC Destination Certification shall be made through the following steps. 12.1.1 The options for the destinations take a step-by-step approach.	Are there any guidelines or requirements to inform whether destinations/clients choose to embark on Options 1/2/3? Would these same Options apply for recertification?	This will only be applicable for initial certification.	12.1. GSTC Destination Certification shall be made through the following options. 12.1.1. Step-by-step pathways.
	12.1 pushing GSTC agenda and anticompetitive in approach to market • 12.1 GSTC Destination Certification shall be made through the following steps. In general , we are against the proliferation of GSTC business models competing with the traditional responsibilities of CBs. This has started with offering GSTC trainings and GSTC auditor trainings, GSTC destination assessment, GSTC destination re-assessment, the status of "GSTC Committed" and now creating the space for a kind of pre-certification workshops. This obviously creates business opportunities to GSTC board members offering consultancy, and reduces the roles of CBs to the generic audit companies that GSTC has actively brought into the tourism certification world while there was no need to do	The requirements have been reviewed and modified in the following clauses.	

	so, making it more complex and more expensive for destinations to embark on the journey to sustainability. All this process is making participation in GSTC Accreditation a very unattractive option for certification bodies who have developed their own trainings, auditor trainings, destination assessment, who reject the unconditional status of "GSTC Committed" and offer solutions for pre certification workshops and support offered by specialized independent partners. 12.1.1 The options for the destinations take a step-by-step approach. This whole section is one big question mark; we kindly request a call with GSTC to explain the details and rationale behind this new approach to eligibility. What is "GSTC Destination Certification" in the first place? I thought this would only be used in 'speaking' terms but does not belong in such a formal document when addressing 'GSTC-Accredited Certification', right? Or is this whole section excluding certification that based on our own Certification Schemes with different certification names?		
12.1.1.1 Option 1 with three steps. 12.1.1.1.1 Step 1. Approved Destination Certification Candidacy status by the CB. 12.1.1.1.2 Step 2. Verified as a destination with a Sustainable Management System (SMS) by the CB (hereafter, GSTC SMS Verified Destination).	This step system (1 2 or 3 does not really matter) does not agree with me. This system makes the application phase very complex and articulated. At this stage the destination may not be very familiar with the certification or may not yet be ready. The long list of documents required is really excessive before the audit and could put some destinations in difficulty where some processes are not directly under their control because they are managed by other organisations operating there (e.g. risk or crisis management, or climate change management). I think this whole part should be very very simplified because it is counterproductive. See comment in 12.1	The requirements have been reviewed and modified. Some of the changes respond to comments. Even the reference standard is GSTC Standard or Recognized Standard; since the CBs perform certification by following GSTC accreditation requirements, they are called GSTC-certified. Therefore, the terminology has been kept.	12.1.1.1. Pathway 1: Three-step approach - Candidacy to GSTC SMS-verified to GSTC-certified. a. Step 1: Applying for GSTC Destination Certification Candidacy Status. CBs shall verify that the client meets the requirements described in 12.3. b. Step 2: Applying for GSTC Sustainable Management System Verified (SMS-verified) destination status. CBs shall verify that the client meets the requirements described in Section 13. c. Step 3: Step 3: Applying for GSTC-certified Destination status. CBs shall conduct a conformity assessment of the client against the Reference Standard to

12.1.1.1.2 Step 3. Certified as a sustainable destination (hereafter, GSTC Certified Destination).	Three step approach makes no sense and will set up total confusion as to what each level means 12.1.1.1.2 Step 3. Why GSTC-Certified Destination ? We issue Green Destinations or Mountain IDEAL Certified Destination; are these steps available to these applicants		determine compliance with all applicable requirements. In addition, CBs shall verify that the client meets the specific requirements outlined in Section 14.
12.1.1.2 Option 2 with two steps. 12.1.1.2.1 Step 1. Approved Destination Certification Candidacy status by the CB. 12.1.1.2.2 Step 2. Certified as a sustainable destination.	See comment in 12.1	The requirements have been reviewed and modified. Some of the changes respond to comments.	12.1.1.2. Pathway 2-1: Two-step approach - Candidacy to GSTC-certified. a. Step 1: Applying for GSTC Destination Certification Candidacy Status. CBs shall verify that the client meets the requirements described in 12.3. b. Step 2: Applying for GSTC-certified Destination status. CBs shall conduct a conformity assessment of the client against the Reference Standard to determine compliance with all applicable requirements. In addition, CBs shall verify that the client meets the specific requirements outlined in Section 14. 12.1.1.3. Pathway 2-2: Two-step approach - GSTC SMS-verified to GSTC-certified. a. Step 1: Applying for GSTC SMS-verified Destination Status. CBs shall verify that the client meets the requirements described in Section 13. b. Step 2: Applying for GSTC-certified Destination status. CBs shall conduct a conformity assessment of the client against the Reference Standard to determine compliance with all applicable requirements. In addition, CBs shall verify that the client meets the specific requirements outlined in Section 14.
12.1.1.3 Option 3 for destinations ready for certification.	See comment in 12.1	The requirements have been reviewed and modified. Some of the changes respond to comments.	12.1.2. Directly applying for GSTC-certified Destination status: CBs shall conduct a conformity assessment of the client against

12.1.1.3.1 CBs may proceed with certification if destinations are ready for audit without any intermediate steps described in Clause 12.1.1.			the Reference Standard and confirm that the client meets all requirements of the standard.
12.1.3 A Destination shall not hold a GSTC Destination Certification Candidacy status for more than two years. The destination shall obtain either a GSTC SMS Verified Destination or a GSTC Certified Destination status.	Why put a timeframe on destination working through criteria?These levels will be totally misunderstood by market	The clause has been updated to enhance clarity and improve understanding.	12.2. A client shall not hold a GSTC Destination Certification Candidacy status for more than two years (see Clause 13.2). The client shall obtain either a GSTC SMS-Verified Destination or a GSTC-certified Destination status.
12.2.1 Completion of a Destination Certification Candidacy Workshop. 12.2.1.1 To be eligible as a Candidate for Destination Certification, a representative from the applicant organization shall complete the online Candidacy Workshop, which the GSTC provides. This is an online asynchronous workshop, which the proposed Candidate can take at any time prior to applying for Candidacy.	12.2.1.1 Why does GSTC need to do this surely that is for the CB to determine	The clause has been updated to enhance clarity and improve understanding.	12.3. Eligibility for step-by-step pathways 1 and 2 (2-1 and 2-2). 12.3.1. Completion of a Destination Certification Candidacy Course. 12.3.1.1. To be eligible as a Candidate for Destination Certification, the applicant organization representative shall complete the free online GSTC Candidacy Course. This is an online asynchronous course, which the proposed Candidate can take at any time prior to applying for Candidacy.

12.2.2 Submission of the documents demonstrating a sustainable tourism management system is in place by a Destination Management Organization(DMO). The documents include the following: 12.2.2.1 Introduction of Destination Management Organization a. The name of the organization applying for candidacy b. Demonstrate the organization has been in place for a minimum of 5 consecutive years. c. Link to the organization's website. d. Name and geographic description of the destination. e. Inventory of destination tourism businesses, including hotels/accommodations, tour operators, and tourism attractions. f. The organization's chart or structure, which identifies all paid and contracted employees with the lead person responsible	12.2. Does not need to be a DMO leading the process. GSTC has no right to ask for documentation from the DMO.Is the DMO really the destination authority b. Why – may have been in another format or be developed as a sustainable organisation. This clause verges on criteria and is set out in the destination standard. Why is it included here? What if the DMO is not the lead?	Thank you for the comment. The documents are submitted to the ACB, not GSTC. While GSTC does not directly communicate with destinations, it retains the right to request these documents from the ACBs. For compliance assessment purposes, GSTC may also request the relevant documents.	12.3.2. Submission of the documents demonstrating a sustainable tourism management system is in place by a DMO. The documents include the following: 12.3.2.1. Introduction of DMO: a. The name of the organization applying for candidacy. b. Demonstrate that the organization has been in place for a minimum of five (5) consecutive years. c. Link to the organization's website. d. Name and geographic description of the destination. e. Inventory of destination tourism businesses, including hotels/accommodations, tour operators, and tourism attractions. f. The organization's chart or structure, which identifies all paid and contracted employees and with the lead person responsible for certification clearly identified. g. The organization's most recent strategic plan, including its mission statement, goals, and objectives. h. The organization's financial plan outlining current and future funding sources for operating the destination organization.

for certification, is clearly identified. g. The organization's most recent strategic plan, including mission statement, goals, objectives, etc. h. The organization's financial plan shows current and future funding sources for operating the destination organization.			
12.2.3 CBs shall verify the submitted information through a desk review to accept the destinations as GSTC Destination Certification Candidates. 12.2.3.1 CBs shall submit the list of destinations with the GSTC Destination Certification Candidacy status to the GSTC Secretariat within 10 days of officially granting the destination the candidacy status. 12.2.3.2 The GSTC Accreditation Secretariat shall review the CB's verification report during surveillance assessments.	STB wishes to highlight that for larger destinations with many stakeholders, the list of stakeholders will not be able to be exhaustive.	Thank you for your comment. However, the destination needs to monitor and maintain a record of these activities, as this is essential for ensuring that the destination meets the necessary scale and requirements for certification	12.3.3. CBs shall verify the submitted information through a desk assessment to accept the destinations as GSTC Destination Certification Candidates. 12.3.3.1. CBs shall submit the list of destinations with the GSTC Destination Certification Candidacy status to the GSTC within 10 days of officially granting the destination the Candidacy status. 12.3.3.2. The GSTC shall review the CB's verification reports related to the Candidacy and/or the GSTC SMS-Verified during surveillance audits.

13.1 A destination is ineligible for the GSTC Certification if: 13.1.1 It does not comply with the requirements described in Section 12. 13.1.2 It has had its certificate withdrawn within the last 2 years. 13.1.3 it has had its certificate suspended within the last 6 months.	if a destination is deciding for option 3; there are not any 'requirements' other than declaring you're ready for certification, i suppose?	Thank you for the question. If a destination is ready for certification, it will follow step 3 and apply for certification.	12.4. Eligibility for Destination Certification 12.4.1. A destination is ineligible for the GSTC Certification if: 12.4.1.1. It has had its certificate withdrawn within the last 2 years. 12.4.1.2. It has had its certificate suspended within the previous 6 months.
13.2 The CB shall require the destination to declare any cases convicted of forced labor or environmental violations in the destination during the application and certification periods.	Definitions for both "forced labor" and "environmental violations" should be provided for clarity and consistent understanding among GSTC, CB and clients. For example, will "environmental violations" comprise cases which have been convicted by the national court?	Thank you for your feedback. We will include the details in the glossary document.	12.4.2. The CB shall require the destination to declare any cases of forced labor convictions or environmental violations in the destination during the application and certification periods.
13.3 If there is a case for violating laws on forced labor and/or environment in the last 2 years, this organization shall not be allowed to continue with the GSTC certification process.	Is the violation of the law intended in any sector or activity within the destination? If for example just one hotel in the destination is convicted of illegal work or just one company for illegal dumping within the destination, will the entire destination not be eligible?	The clause has been updated to enhance clarity and improve understanding.	12.4.3. If documented cases of forced labor or environmental law violations have occurred in the past two years, the Destination shall disclose them to the CB and provide evidence of the prevention, response, and follow-up mechanisms implemented, along with the outcomes achieved. 12.4.3.1. Certification may only be denied if the destination fails to demonstrate that it has a functional framework for managing such cases or if there is evidence of poor governance or inaction.
14.1 Destinations can apply for the GSTC SMS Verified Destination status before seeking	GSTC controlling processes for no reason. This should sit with CBs.	Thank you for the comment. The requirements have been reviewed and modified, and some of the changes respond to comments.	13.1. Destinations can apply for the GSTC SMS-Verified Destination status before seeking GSTC Destination Certification.

GSTC Destination Certification.. 14.2 CBs shall initiate the verification process within two years of destination certification candidacy approval by the GSTC. 14.3 CBs shall verify if the destination meets Pillar A requirements of the GSTC Destination Criteria through desk review and onsite verification. 14.4 CBs shall initiate the GSTC Destination Certification process within three years of issuing the GSTC SMS Verified Destination Certificate	Adding another recognition of "Sustainable Destination Management Verification" is only adding to the confusion – GSTC's name should ONLY be associated with full Certification; nothing else – because any Member, Committed, or Verified status is devaluating the status of 'GSTC-Accredited Certification' and is in competition with GSTCs members.		13.2. CBs shall initiate the verification process within two years of obtaining GSTC Destination Certification Candidacy status if the destination follows the three-step pathway as outlined in 12.1.1.1. 13.3. CBs shall verify if the destination meets Pillar A requirements of the GSTC Destination Standard through desk assessment. 13.4. CBs shall initiate the GSTC Destination Certification process within three years of issuing the certificate of the GSTC SMS-verified Destination. 13.5. CBs shall guide their clients in claiming their GSTC SMS-verified status rather than delivering it as a GSTC-certified destination.
Time limits for Destination Candidacy and GSTC SMS Verified Status 15.1 Destinations shall apply for the GSTC Destination Certification after obtaining the GSTC SMS Verified Destination status or the GSTC Destination Certification Candidacy status. 15.1.1 The GSTC Destination Certification application shall be	Is the application in 15.1.1 to be submitted by the client or the CB to GSTC?	Thank you for the comment. The client should apply to the Certification Body.	14.1. Destinations shall apply for the GSTC Destination Certification after obtaining the GSTC SMS-verified Destination status or the GSTC Destination Certification Candidacy status within no later than the following periods. 14.1.1. The GSTC Destination Certification application shall be submitted within 2 years of obtaining Candidacy status or 3 years of being a GSTC SMS-verified destination (see Clause 12.2). 14.1.2. CBs shall verify compliance with all applicable requirements during the certification process, regardless of the destination's GSTC Candidacy or SMS-verified status.

submitted within 2 years of obtaining candidacy status or 3 years of being a GSTC SMS Verified Destination.			
Requirements for Certified tourism businesses, Renewable energy, and Green transport 15.2 The CBs shall verify the following requirements before proceeding with the certification process. 15.2.1 The destination shall have a clear plan for sustainable tourism businesses with specific targets for certification, renewable energy, and green transport.	This is not clear...how the meaning of the plan? and what the contents? not clear and too complexAdditionally, these are requirments also for the destination itself...once again GSTC is adding requirments for the CH in the document for CB! Please see comments as indicated below on specific clauses under Section 15	Thank you for the comment. The plan can be integrated into a destination management strategy or maintained separately. However, if destinations do not have such a plan, it raises the question of how they can be considered sustainable. The requirements are directly tied to CBs, as we mandate that ACBs obtain and verify these plans. To clarify this, we have revised the clause accordingly.	14.2. The CBs shall verify the following requirements before proceeding with the certification process. 14.2.1. The destination shall have a baseline and a clear plan for sustainable tourism management with specific targets for certified tourism businesses, renewable energy, and green transport. CBs are responsible for verifying the plan's existence, completeness, and adequacy to ensure they meet the required standards.
15.3 Certified Tourism Businesses. At least 15% of the following tourism businesses have been certified to international or national sustainability standards, which include the GSTC Criteria.	simply impossible... To clarify if the denominator for this 15% criteria is by industry (e.g. Hotels/MICE), or the overall tourism sector. Is the 15% a hard requirement or a benchmark (the latter is an assumption based on 15.3.5)? STB would like to provide feedback for consideration that some degree of flexibility be granted for Section 15 instead of fixed % requirements, given that the scale and scope of each destination audit is different. Why linked to GSTC criteria? BCorp and ISO standards equally viable. 15% of active tourism businesses or all listed (that would include Ubers and is not viable).	Thank you for the comment. When these requirements were presented during the GSTC Destination Members Meeting, there was minimal objection. The scope of the industry sector is clearly defined, and it is important to emphasize that without sustainable businesses, a destination cannot legitimately claim to be a sustainable tourism destination. Certification is the most reliable and objective method to assess the sustainability of businesses. This is the rationale behind our request for this requirement.	14.3. Certified Tourism Businesses. At least 15% of the following tourism businesses have been certified to international or national sustainability standards, which include the GSTC Standards.

15.3.1 The international or national sustainability standards shall cover social, cultural, or environmental aspects of sustainability.	We seek clarification if either social/cultural/environmental aspects should be covered, or all three.	Thank you for the comment. It should cover all aspects, including social, cultural and, environmental.	14.3.1. The international or national sustainability standards shall cover social, cultural, and environmental aspects of sustainability.
15.3.2 The certification in clause 15.3 shall be one of the accredited schemes by the IAF members.	This clause overlaps with 15.3 and may cause confusion. Suggest to be clear and comprehensive under 15.3 what types of standards are acceptable.	Thank you for the comment. The requirements have been reviewed and modified. Some of the changes respond to comments.	14.3.2. The certification in clause 14.3.1 shall be performed by certification bodies accredited by national or international accreditation organizations.
	In many destinations, industry certification schemes accredited by IAF members are not available and when they are available they will no longer be affordable for SMEs under the new GSTC Accreditation rules for Industry, especially due to the heavy auditing requirements. We request to widen the requirement to industry certification schemes and follow the requirements set by Travalyst.15.4 Renewable energy. Destinations set targets for renewable energy production and supply with a defined timeframe that aligned with the national climate change strategy and renewable energy production.		
15.3.3 The tourism businesses counted in this Manual are limited to the following: 15.3.3.1 Hotels/Accommodations 15.3.3.2 Tour operators 15.3.3.3 MICE (Meetings, Incentives, Conventions/Conferences, and Events/Exhibitions) 15.3.3.4 Attractions	Tour operators with legal address within the destination or operating in the destination?	Thank you for the comment. The requirements have been reviewed and modified. Some of the changes respond to comments.	14.3.3. Only certified tourism businesses with a registered legal address in the destination shall be considered when estimating the percentage of certified businesses, and these shall be limited to the following types: 14.3.3.1 Hotels/Accommodations 14.3.3.2 Tour operators 14.3.3.3 MICE 14.3.3.4 Attractions 14.3.3.5. Food and Beverage Service Provides

15.3.4 The percentage of the certified tourism businesses includes: 15.3.4.1 The percentage of GSTC-Certified hotels/accommodations; 15.3.4.2 The percentage of GSTC-Certified tour operators; 15.3.4.3 The percentage of GSTC-Certified MICE businesses; 15.3.4.4 The percentage of GSTC-Certified attractions; 15.3.4.5 The percentage of tourism businesses to the GSTC-Recognized standards that are used by GSTC-Accredited CBs; and 15.3.4.6 The percentage of tourism businesses certified to other international or national standards that are described in clauses 15.3.1 and 15.3.2.	who count this? based on witch data? honestly all this sound too complex and without any sense...this will be a huge limitation for the destination. Often the certified destination arrives before its hotels... please remove this section about 15%	Thank you for the comment. The requirements have been reviewed and modified, and some of the changes respond to comments. The requirement for a certain level of certified business is essential for the destinations that want to apply for certification. It also covers international and national standards. This has already been asked in the D-Standard A4.	14.3.4 The percentage of the certified tourism businesses includes: 14.3.4.1 The percentage of GSTC-certified hotels/accommodations; 14.3.4.2 The percentage of GSTC-certified tour operators; 14.3.4.3 The percentage of GSTC-certified MICE businesses; 14.3.4.4 The percentage of GSTC-certified attractions; 14.3.4.5 The percentage of GSTC-certified food and beverage service providers; 14.3.4.6 The percentage of certified tourism businesses to the GSTC-Recognized standards that are used by GSTC-accredited CBs; and 14.3.4.7 The percentage of certified tourism businesses against other international or national standards that are described in clauses 14.3.1 and 14.3.2.
	STB would like to provide feedback for consideration that some degree of flexibility be granted for Section 15 instead of fixed % requirements, given that the scale and scope of each destination audit is different.		
	To confirm that other industry-specific/national standards and certifications are acceptable, not only GSTC/GSTC-Recognised ones.		
	Regarding 15.3.4.3 These are venues and businesses. Cannot certify 15% of all events, thus it will be venue based. Not viable should not be included.		
15.3.5 CBs shall justify if they certify destinations having less than 15% tourism businesses.	considering the Note. "The percentage of GSTC-Certified MICE businesses and attractions will be evaluated, respectively, following the launch of the GSTC MICE and the GSTC Attraction Certification. But other certifications	Thank you for the comment. The requirements have been reviewed and modified, and some of the changes respond to comments.	14.3.5 CBs shall justify why a destination is awarded GSTC certification when less than 15% of the destination's tourism businesses are certified as sustainable.

Note. The percentage of GSTC-Certified MICE businesses and attractions will be evaluated, respectively, following the launch of the GSTC MICE and the GSTC Attraction Certification. But other certifications meeting clauses 15.3.1 and 15.3.2 can be counted.	meeting clauses 15.3.1 and 15.3.2 can be counted." an appropriate period of time must be left between when the standards in question come into force Suggest to rephrase this clause to make clear that the 15% refers to the percentage of tourism biz that have acceptable sustainability standards, if that was the intended meaning. Is there another % threshold for tourism biz to be specifically GSTC certified? Also, a longer timeframe will be required to enact this as businesses and attractions will need sufficient lead time to adopt the criteria.	There is no specific threshold for GSTC Certification; it covers international or national sustainability standards. They can also be certified against international or national standards. Therefore, there is no timeframe for GSTC Certification in this context.	Note: The percentage of GSTC-certified MICE businesses (14.3.4.3), attractions (14.3.4.4), and food and beverage service providers (14.3.4.5) shall be counted from the launch of such certification. However, other available GSTC certifications that comply with clauses 14.3.4.1 and 14.3.4.2 may be registered.
15.4 Renewable energy. Destinations set targets for renewable energy production and supply with a defined timeframe that aligned with the national climate change strategy and renewable energy production. 15.4.1 Renewable energy supply accounts for at least 10% of the total. 15.4.2 The achievement of each target year shall be verified.	15.4.1: Is this 10% a criteria which needs to be already achieved by the destination, or is it a target % as per 15.4? Could GSTC consider some flexibility on this clause 15.4, as it would not apply to destinations which have natural constraints in deploying renewable energy. 15.4.1 Needs to be contextually driven. This should sit in standard not in manual.	Thank you for the comment. The requirements have been reviewed and modified, and some of the changes respond to comments.	14.4. Renewable energy. Destinations set targets for renewable energy production and supply with a defined timeframe that is aligned with the national climate change strategy and renewable energy production. 14.4.1. Renewable energy supply accounts for at least 10% of the total where applicable. 14.4.2. CBs shall justify why a destination is awarded GSTC certification with less than 10% of its energy coming from renewable sources. 14.4.2.1. Meeting the planned targets shall be verified annually.
15.5 Green transport. Destinations set targets for green transport and cleaner mobility aligned with national climate change strategy and target	All these requirements must be present in the destination standard, not (or at least not only) in the accreditation standard. In little destination these activities are not under the DMO control	Thank you for the comment. The clause was slightly revised.	14.5. Green transport. Destinations set targets for green transport and cleaner mobility aligned with national climate change strategy and target and provide evidence that confirms the implementation of the target.

and provide evidence that confirms the implementation of the target. 15.5.1 At least 10% of rental cars and tour buses use green transport.	15.5: A definition of "green transport" would be appreciated, for a common understanding of the term and what is comprises. 15.5.1: Is this 10% a criteria which needs to be already achieved by the destination, or is it a target % as per 15.5? We seek GSTC's consideration to grant flexibility according to each destination. For example in Singapore's case, tourists are unlikely to rent cars because of the small size of the destination, and the presence of a highly connected, affordable and accessible public transport system. In addition, based on governance structure, the national green transport policy is managed by the MOT not STB. Hence at present, greening the public transport system network is prioritised over private bus fleets, including tour buses. 15.5.1. this may not be practically possible everywhere		14.5.1. Destinations have a green transportation policy with a specific target of green public transportation. 14.5.2. At least 10% of rental vehicles and tour buses use green transport solutions. 14.5.3. CBs shall justify why a destination is awarded GSTC certification when less than 10% of rental vehicles and tour buses offer green transport solutions. Note: See the definition of Green transport in the Glossary.
Sampling Requirements 15.6 The CBs shall have documented procedures for determining the sampling process and audit duration based on the risk assessment considering the following factors: 15.6.1 The size of the DMO; 15.6.2 Tourism contribution to the destination economy; 15.6.3 The ratio of the volume of visitors	again audit durantion here...before it was based on risk assessment, here again other factors...the document is redundant and complex about this topic making it impossible to define a clear and comprehensible procedure	Thank you for your valuable insights. A guidance document outlining sampling procedures and setting maximum durations will be prepared.	Sampling Requirements 14.6. The CBs shall have documented procedures for determining the sampling process and audit duration based on the following factors: 14.6.1. The size of the DMO; 14.6.2. Tourism contribution to the destination economy; 14.6.3. The ratio of the volume of visitors to the number of residents; 14.6.4. The percentage of residents involved in tourism-related businesses; 14.6.5. The complexity of tourism businesses in terms of numbers, types, and size; 14.6.6. Culturally significant and/or sensitive tangible and intangible heritage, such as UNESCO World Heritage sites,

compared to the number of residents; 15.6.4 The percentage of residents involved in tourism-related businesses; 15.6.5 The complexity of tourism businesses in terms of numbers, types, and size; 15.6.6 Culturally significant and/or sensitive tangible intangible heritage, such as UNESCO World Heritage sites, archaeological sites, national or local heritage, and/or Indigenous communities; and 15.6.7 Environmentally important and/or vulnerable sites include locally, nationally, or internationally protected areas, sites vulnerable to climate change, high biodiversity ecosystems, etc.			archaeological sites, national or local heritage, and/or Indigenous communities; and 14.6.7. Environmentally important and/or vulnerable sites include locally, nationally, or internationally protected areas, sites vulnerable to climate change, high biodiversity ecosystems, etc.
15.7 The CBs shall ensure the samples represent a diverse range of stakeholders, including businesses, communities, civil societies, academia, and public bodies, as well as places most	At every MA and SV audit? During the 3-years cycle? To encourage adoption of certification and continued recertification, we recommend that the surveillance audit need not be as onerous as the initial audit. Rather, new areas (e.g. those deemed high risk) should be audited to avoid repetition.	Thank you for your valuable insights. A guidance document outlining sampling procedures and setting maximum durations will be prepared.	14.7 The CBs shall ensure the samples represent diverse stakeholders, including businesses, communities, civil societies, academia, and public bodies, as well as places most visited and conflicts raised due to tourism. The procedure shall meet IAF MD1:2018 Requirements.

visited and conflicts raised due to tourism. The procedure shall meet IAF MD1:2018 Requirements.			
17.2.2. The GSTC may arrange publicity and promotion of the GSTC-Accredited CB and tourism businesses certified by the GSTC-Accredited CB.	How will this be done in a balanced and fair manner without preferential treatment when the Chair of the GSTC is a CB CEO?This for destinations so why is the promotion for businesses	Thank you for your valuable insights. The clause is revised slightly. A guidance document outlining sampling procedures and setting maximum durations will be prepared.	16.2.2. The GSTC may arrange publicity and promotion of the GSTC-accredited CB and tourism businesses and destinations certified by the GSTC-accredited CBs.
Annex A A.1.3. The GSTC-Accredited CB submits an application for extension of technical sub-scope to GSTC: - The CB shall indicate and provide the evidence regarding the GSTC-Recognized Standard owned by the respective CS. - The Standard of the CS shall be the GSTC-Recognized Standard. If the GSTC-Recognized status is expired, the CS shall re-apply or renew the GSTC-Recognized status of the standard in accordance with the GSTC-Recognized Manual v5.0. - Tour Product is a part of the technical scope of the TO and does not	A.1.3 Does not appear to relate to destinations.	Thank you for your comment; the irrelevant part has been removed from the clause.	A.1.3. The GSTC-accredited CB submits an application for extension of technical sub-scope to GSTC: - The CB shall indicate and provide the evidence regarding the GSTC-Recognized standard owned by the respective CS. - The Standard of the CS shall be the GSTC-Recognized standard. If the GSTC-Recognized status is expired, the CS shall re-apply or renew the GSTC-Recognized status of the standard in accordance with the GSTC-Recognized Manual in its latest version.

require additional technical scope and separate application process.			
A.1.6. GSTC carries out the witness assessment (of a CB audit of the GSTC-Recognized Standard: - Major nonconformities resulting from the witness assessment shall be satisfactorily closed.	Typo	Thank you for the comment; typo has been corrected.	A.1.6. GSTC carries out the witness assessment (of a CB audit of the GSTC-Recognized Standard): - Major nonconformities resulting from the witness assessment shall be satisfactorily closed.

A.3 Destination Members

Section	Initial Draft	Comments	GSTC Analysis and Decision
12. Eligibility for Destination Certification and Steps	12.1.2. Destinations shall apply for the GSTC Destination Certification after obtaining the GSTC Sustainability Management System (SMS) Verified Destination status or the GSTC Destination Certification Candidacy status in no later than the following periods. 12.1.2.1. The GSTC Destination Certification application shall be submitted within 2 years of obtaining candidacy status or 3 years of being a GSTC SMS Verified Destination. 12.1.2.2. CBs shall verify all the requirements during the certification process regardless of the destination's GSTC candidacy or SMS Verified status.	We understand from the public consultation done in Aug 2024 that there is also an option that CBs may proceed with certification directly if destinations are ready for audit. However, we suggest to be clearer on the guidelines/requirements that would allow a destination to be eligible for direct certification without the steps mentioned in 12.1.2. Is it mandatory for the certification, to obtain the GSTC Sustainability Management System (SMS) Verified Destination status or the GSTC Destination Certification Candidacy status? How it works and what is the investment for it?	Thank you for the comment. The clause is revised as follows: 12.1.2. Directly applying for GSTC-certified Destination status: CBs shall conduct a conformity assessment of the client against the Reference Standard and confirm that the client meets all requirements of the standard.
15. Requirements for Destination Certification	Requirements for Certified tourism businesses, Renewable energy, and Green transport 15.2. The CBs shall verify the following requirements before proceeding with the certification process. 15.2.1. The destination shall have a clear plan for sustainable tourism businesses with specific targets for certification, renewable energy, and green transport.	Basically, no objections but green transport especially for tourism industry sounds bit hard to estimate for municipalities in city area, because there happens both visitors and locals use public transports.	Thank you for the comment. The clause is revised as follows: 14.2.1. The destination shall have a baseline and a clear plan for sustainable tourism management with specific targets for certified tourism businesses, renewable energy, and green transport. CBs are responsible for verifying the plan's existence, completeness, and adequacy to ensure they meet the required standards.

15. Requirements for Destination Certification	15.3. Certified Tourism Businesses. At least 15% of the following tourism businesses have been certified to international or national sustainability standards, which include the GSTC Criteria. 15.3.1. The international or national sustainability standards shall cover social, cultural, or environmental aspects of sustainability. 15.3.2. The certification in clause 15.3.1 shall be one of the accredited schemes by the IAF members. 15.3.3. The tourism businesses counted in this Manual are limited to the following: 15.3.3.1. Hotels/Accommodations 15.3.3.2. Tour operators 15.3.3.3. MICE (Meetings, Incentives, Conventions/Conferences, and Events/Exhibitions) 15.3.3.4. Attractions	On Criteria 15.3 - STB would like to provide feedback for consideration that some degree of flexibility be granted for Section 15 instead of fixed % requirements, given that the scale and scope of each destination audit is different, e.g. Singapore tracks hotel certification by room stock rather than tourism businesses. On Criteria 15.3.1 - We seek clarification if either social/cultural/environmental aspects should be covered, or all three. On Criteria 15.3.2 – Can we confirm that the various GSTC certification are / will be an accredited scheme by an IAF member? What about GSTC-Recognized standards? For national sustainability standards, we suggest to provide greater flexibility in not mandating that is has to be accredited by IAF, but as long as it can be demonstrated that there was a robust process in place in its development, to allow for such standards to also be accepted.	Thank you for the comment. The clause is revised as follows: 14.3.1. The international or national sustainability standards shall cover social, cultural, and environmental aspects of sustainability. 14.3.2. The certification in clause 14.3.1 shall be performed by certification bodies accredited by national or international accreditation organizations.
		15.3.2. The certification in clause 15.3.1 shall be one of the accredited schemes by the IAF members >> this is also for the SME´s? All must be accredited schemes by the IAF members?	
		15.3. To set a percentage like this in my opinion is only possible, if there is a clear definition of the sustainability standards that are recognized otherwise "everything goes". With a clear definition of the recognized standards I think the % should be defined also within a time range. 15.3.3.4. Attractions: does this include lift facilities? These are very important for ski resorts and should absolutely be included	

15. Requirements for Destination Certification	15.3.4. The percentage of the certified tourism businesses includes: 15.3.4.1. The percentage of GSTC-Certified hotels/accommodations; 15.3.4.2. The percentage of GSTC-Certified tour operators; 15.3.4.3. The percentage of GSTC-Certified MICE businesses;	To confirm that other industry-specific/national standards and certifications are acceptable, not only GSTC/GSTC-Recognized ones, since Criteria 15.3.1 does not only specify GSTC-Certified businesses	Thank you for the comment. The clause is revised as follows: Note: The percentage of GSTC-certified MICE businesses (14.3.4.3), attractions (14.3.4.4), and food and beverage service providers (14.3.4.5) shall be counted from the launch of such certification. However, other available GSTC certifications that comply with clauses 14.3.4.1 and 14.3.4.2 may be registered.
	15.3.4.4. The percentage of GSTC-Certified attractions; 15.3.4.5. The percentage of tourism businesses to the GSTC-Recognized standards that are used by GSTC-Accredited CBs; and 15.3.4.6. The percentage of tourism businesses certified to other international or national standards that are described in clauses 15.3.1 and 15.3.2.	No objections (MICE and attraction criteria are new ones so we would like to know which certifications would be applicable for them.)	
15. Requirements for Destination Certification	15.3.5. CBs shall justify if they certify destinations having less than 15% tourism businesses. Note. The percentage of GSTC-Certified MICE businesses and attractions will be evaluated, respectively, following the launch of the GSTC MICE and the GSTC Attraction Certification. But other certifications meeting clauses 15.3.1 and 15.3.2 can be counted.	Suggest to rephrase this clause to make clear that the 15% refers to the percentage of tourism biz that have acceptable sustainability standards, if that was the intended meaning.	Thank you for the comment. The clause is revised as follows: 14.3.5. CBs shall justify why a destination is awarded GSTC certification when less than 15% of the destination's tourism businesses are certified as sustainable.

15. Requirements for Destination Certification	15.4. Renewable energy. Destinations set targets for renewable energy production and supply with a defined timeframe that aligned with the national climate change strategy and renewable energy production. 15.4.1. Renewable energy supply accounts for at least 10% of the total. 15.4.2. The achievement of each target year shall be verified.	Criteria 15.4.1 - Is this 10% a criteria which needs to be already achieved by the destination, or is it a target % as per 15.4? For GSTC to consider some flexibility in this clause 15.4, as it would not apply to destinations which have natural constraints in deploying renewable energy.	Thank you for the comment. The clause is revised as follows: 14.4.1. Renewable energy supply accounts for at least 10% of the total where applicable. 14.4.2. CBs shall justify why a destination is awarded GSTC certification with less than 10% of its energy coming from renewable sources. 14.4.2.1. Meeting the planned targets shall be verified annually.
15. Requirements for Destination Certification	15.5. Green transport. Destinations set targets for green transport and cleaner mobility aligned with national climate change strategy and target and provide evidence that confirms the implementation of the target. 15.5.1. At least 10% of rental cars and tour buses use green transport. Note: See the definition of Green transport in the Glossary.	Criteria 15.5 – A definition of "green transport" would be appreciated, for a common understanding of the term and what is comprises. Criteria 15.5.1 – Is this 10% a criteria which needs to be already achieved by the destination, or is it a target % as per 15.5? We seek GSTC's consideration to grant flexibility according to each destination. For example in Singapore's case, tourists are unlikely to rent cars because of the small size of the destination, and the presence of a highly connected, affordable and accessible public transport system. In addition, based on governance structure, the national green transport policy is managed by the MOT not STB. Hence at present, greening the public transport system network is prioritised over private bus fleets, including tour buses / rental cars. It is difficult to give a comment, if I can't see the definition of Green transport here, as I think I cannot hop back to this point, once I click on next.	Thank you for the comment. The clause is revised as follows: 14.5.1. Destinations have a green transportation policy with a specific target of green public transportation. 14.5.2. At least 10% of rental vehicles and tour buses use green transport solutions. 14.5.3. CBs shall justify why a destination is awarded GSTC certification when less than 10% of rental vehicles and tour buses offer green transport solutions. Note: See the definition of Green transport in the Glossary.

		Basically, no objections, but in regards of 15.5.1, would public transport be eliminated from those 10%?	