GSTC and EU Regulations

Informal Paper – January 2024

This is an Informal Paper on GSTC's Perceptions of How its Programs Relate to Current and Pending European Commission Regulations

[January 2024]

GSTC

Global Sustainable Tourism Council

Overview

The Global Sustainable Tourism Council (GSTC) is a non-profit organization founded by UN agencies UNEP, UNWTO, and prominent organizations in the conservation community and tourism industry. GSTC operates globally, including inside the European Union (EU).

This paper serves to informally (and without external review) provide insights into GSTC's accreditation-based program's current and likely future compliance with the spirit and the letter of the EU's:

CSDDD / Corporate Sustainability Due Diligence Directive

Speaks to businesses operating within the EU to have meaningful management and governance policies and practices in place to ensure that their own operations and those of suppliers involve meaningful and effective protections for the environment and human rights.

CSRD / Corporate Sustainability Reporting

Requires external reporting on those matters. The GSTC Criteria provide tremendous guidance in significant detail on both environmental and human rights issues and practices, as well as guidance for good governance and management practices.

Green Claims Directive

Sets requirements for businesses to only make market-facing claims of "green" or "sustainable" that are supported by review from 3rd-party entities that are themselves accredited. GSTC's accreditation program is EU-compliant and is a world-class mechanism providing guidance on good 3rd-party certification based on international norms.

Accreditation in the European Union

In 2008 the European Commission (EC) adopted EC Regulation 765, requiring that each member state identify a "Single National Accreditation Body per Country". That is to say, EU member states operate or formally designate a legal monopoly on the function of accreditation within each member state. When GSTC's global accreditation program was formally established in 2016, GSTC contracted with the Germany-based firm Assurance Services International (ASI), which was then operating under a temporary agreement with the German national accreditation body (DAkks) which was later formalized with an agreement that ASI could continue operating as an accreditation body inside the EU by requiring its clients – including GSTC – to enter into formal agreements with any national accreditation body inside the EU. GSTC has made the partnership with Accredia, the Italian national accreditation body. GSTC will contract with other national accreditation bodies if the other EU national accreditation bodies choose to accredit the certification bodies in their countries rather than relying on Accredia to do so.

As of October 1st, 2023, GSTC now operates its global accreditation program in-house with a formal relationship with Accredia for operations within the EU.

Accredia and GSTC have a formal and legal agreement on how GSTC Accreditation per the GSTC Accreditation Manual is performed inside the European Union per the requirement of 2008 EC Regulation 765. Auditing duties are shared appropriately between Accredia and GSTC but Accredia makes the crucial accreditation decisions for all certifications issued to EU-based businesses.

As such, we at GSTC consider that we are in compliance with 2008 EC Regulation 765 for the accreditation of certification of hotels, tour operators, and touristic destinations as "sustainable". GSTC is likely unique in this full level of compliance to this regulation for the certification of hotels and tour operators inside the EU. We are not aware of a mechanism to verify this claim, but we believe it to be true.

EU Green Claims Directive

This directive requires and provides guidance on how businesses must substantiate any claims made in their external communications on environmental and human rights protections.

Businesses will do well to address the broad sets of issues inherent within those two realms of environmental and human rights issues. The GSTC Criteria include quite holistic approaches to both.

The GSTC Criteria include reference and guidance to support both:

- Environment: greenhouse gas emission, pollution, wastewater, solid waste, water, energy, animal welfare, protection of wildlife, biodiversity, procurement, contracting of travel service providers, and more

- Human Rights: exploitation and harassment content that includes child labor, human trafficking; employee labor rights content includes fair and non-discriminatory labor practices, living wages, equal opportunity for both employment and training/promotion

Credible Verification of Travel Businesses and Supply Chains

The greatest impacts most travel and tourism make on the environment and human rights are not inside their offices but rather found in the enormous supply chains of even the smallest of tourism businesses. They contract with hotels, land transport providers, attractions, food and beverage providers, and myriad services to deliver a combination of "commodity travel" (mostly transport, mostly price and schedule-based) and "experience travel" components that are largely service-based with business performance based largely on the subjectivity of market demand. The impacts of contracting decisions are enormous, to the point of possibly immeasurable. The most effective filtering, monitoring, measurement, and reporting on the sustainability of those vast supply chains is for businesses with B2B products and services contracting with businesses certified by credible and rigorous Certification Bodies.

The only current reliable means of verifying the rigor and credibility of Certification Bodies to a standard that holistically encapsulates the breadth of "sustainable tourism" is GSTC Accreditation, which is compliant with EC 2008 Regulation 765.

GSTC Accreditation Manual

The GSTC Accreditation Manual (AM) forms the basis for accreditation of certification for sustainable tourism. The AM is built on a strong foundation of international norms and standards for certification and accreditation, formulated for relevance to the travel and tourism sector.

GSTC is guided strongly by ISO 17011 on how we operate our accreditation program and by ISO 17065 on how we define and guide credible auditing and certification processes for the entities we accredit. Further guidance comes from IAF and the ISEAL Alliance Assurance Code.

Among other principles, the GSTC Accreditation Manual strongly pursues good certification based on impartiality and rigor.

The GSTC Criteria

These are widely accepted and applied as global standards for sustainable tourism. They are known collectively as the GSTC Criteria. They are based on UN definitions and guidance on what constitutes sustainable tourism, which were established by UNEP and UNWTO in 2005. The GSTC Criteria are based on four pillars: 1) management and governance for sustainable practices, 2) community and human rights impacts, 3) cultural impacts, and 4) environmental impacts.

The Criteria are developed and managed with occasional revisions through a highly inclusive, transparent and structured process, guided by our analysis of the ISEAL Standards Setting Code.

Currently, GSTC manages two standards:

1. The GSTC Industry Criteria, as guidance for all types of tourism businesses, and fully developed within the GSTC Accreditation Manual and accreditation program for good certification of hotels/accommodations and for tour operators/land transport

2. The GSTC Destination Criteria, as guidance for good public policy on travel and tourism at the national and sub-national levels, and fully developed within the GSTC Accreditation Manual and accreditation program for good certification of tourism destinations.

Currently in development to formally launch two additional standards in 2024:

3. The GSTC MICE Criteria, as guidance for business Meetings, Incentives, Conventions, Conferences, Events, and Exhibitions including trade shows/fairs; and fully developed within the GSTC Accreditation Manual and accreditation program for good certification of venues and professional conference organizers (PCOs)/meeting planners

4. The GSTC Attractions Criteria, as guidance for touristic attractions including but not limited to nature areas, theme parks, museums, and a range of any and all types of facilities and places visited as part of travel experiences; and fully developed within the GSTC Accreditation Manual and accreditation program for good certification of defined types of attractions

GSTC Credentials

GSTC is a current and active Community Member of the ISEAL Alliance, the leading organization in providing a knowledge-sharing platform for leading sustainability programs in many sectors — including FSC, RSPO, MSC, ASC, Fair Trade International, and many more. When ISEAL re-opens their Code Compliance membership category sometime in 2024, GSTC intends to open an application for that membership level.

As of this writing, GSTC is pursuing membership in IAF, the International Accreditation Forum, via the required membership in the regional network of Inter American Accreditation Cooperation (IAAC).

GSTC maintains all legal requirements for 501(c)3 non-profit corporation status in the USA.

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