



GSTC Report on the Accreditation Manual Revision

GSTC Accreditation Manual for Certification of
Hotels/Accommodation & Tour Operator version 3.1
to
GSTC Accreditation Manual for Certification Bodies - Industry:
Hotel/Accommodation & Tour Operator version 4.0

Summary of the Revision Process and Key Changes

November 1, 2024

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Document Control

This report outlines the revision process and key changes to the GSTC Accreditation Manual.

Document Approval

November 1, 2024

GSTC Global Assurance Director

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The Global Sustainable Tourism Council

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1. Introduction

Background

The GSTC Accreditation Manual for the Certification Bodies - Industry: Accommodation/Hotel & Tour Operator (abbreviated as the Accreditation Manual throughout the report) serves as a critical guide for ensuring quality and standards for the Certification Bodies (CBs). Given the dynamic nature of the industry, 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 the needs, the Accreditation Manual has been updated from version 3.1 to version 4.0. This comprehensive revision aims to enhance the manual's clarity, applicability, and overall effectiveness. The revision process involved multiple stages to ensure thoroughness and inclusivity.

The key stages of the revision process included the preparation of a draft, which involved extensive research with relevant ISO and IAF documents. This initial draft was then subjected to a rigorous public consultation process, where feedback was solicited from a wide range of stakeholders, including Certification Bodies, NPOs, experts from the travel and tourism industry and individual consultants

The report summarizes the changes of the Accreditation Manual v.3.1 to v.4.0 taking into account the feedback and comments from industry players. It outlines the purpose of the report followed by the methodological steps taken to undergo the revision. The outcome of the extensive public consultations and workshops will be highlighted in the results section. The results lists the summaries of the public consultation and summarizes key changes made that have been reflected in the version 4.0 of the Accreditation Manual.

The changes to each version of the Accreditation Manual is summarized below.

Table 1. Accreditation Manual version

Version number	Main changes	Effective date
1.0	Initial draft following the ISO and IAF documents and GSTC own checklist	2016
2.5	Changes made to specific clauses	April 27, 2021
3.0	Changes made to Requirements for Tour Operators and Tour Production Certification	October 13, 2024
3.1	Minor revisions	October 13, 2023
4.0	Risk assessment, remote audit, auditor qualification, Clause 8.0, and Manual structure	November 1, 2024

This report outlines the changes from GSTC Accreditation Manual v.3.1 to GSTC Accreditation Manual v.4.0.

The report has been prepared to demonstrate clarity and transparency in the consultations and revision processes. An inclusive and rigor process has been taken in all steps.

Purpose

The report aims to provide a comprehensive overview of the revision process of the Accreditation Manual for Certification of Accommodation/Hotel & Tour Operator from v.3.1. This document aims to:

1. outline each stage of the revision process, including the initial drafting process, public consultation, public consultation response, online workshop, subsequent revisions based on workshop feedback, and the finalization of the manual.
2. highlight the key changes. Identify and elaborate on the major changes, updates, and improvements made in the new revision of the manual.
3. summarize the feedback received from various stakeholders during public consultation and online workshops.

By fulfilling these objectives, this report aims to ensure transparency in the revision process, demonstrate the thoroughness of the updates made, and underscore the commitment to maintaining high standards of quality in the accreditation for certification body on certifying the accommodation/hotel and tour operator.

2. Methodology

The new version of the GSTC 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 the version 4.0:

- 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 System (version 1) was reviewed to follow its stakeholder engagement requirement during the public consultation and reflect the assurance requirements into the Accreditation Manual version 4.0.

Stakeholder engagement

To invite more stakeholders to give their opinions workshops and online interviews were conducted. The aim was to collect comments and hear from all stakeholders related to accreditation, including the GSTC-Accredited certification bodies, GSTC-Recognized standard owners, GSTC members, and GSTC social media followers.

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 is the methods used for outreaching:

1. Online public consultation from December 29, 2023 to April 6, 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.

2. Online workshops on July 3, 2024.

An online workshop was held with Certification Bodies, consultants in tourism on the revision of Accreditation Manual v.3.1. Two separate online workshops with the same content were held to cover the different time zones.

3. Private emailing

Another option to the public consultation was private emailing to Certification Bodies, GSTC-Recognized Standard Owners, relevant NGOs such as WWF, public consultation participants, and so on. They were invited to make comments and feedback to each clause and respond to GSTC taking a more comprehensive approach.

The email was sent to the stakeholders at different stages, such as during the public consultation, and before and after online workshops.

4. Reviewing comments received through ongoing feedback mechanism

Some stakeholders shared their views about the Accreditation Manual before the official revision process, and those were also reviewed during the official process.

5. Assurance Panel members' comments

Members of the GSTC Assurance Panel 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.

3. Results

A significant number of responses have been received. The public consultation, which lasted 100 days received 196 comments from more than 10 stakeholder organizations, while the online workshops and private emailing received 77 comments. Responses were received from Certification Bodies, Recognized Standard Owners, International Organizations, and other professional individuals. A list of organizations participated in the public consultation and workshops is available as Annex.

Key comments received

Comments on the Accreditation Manual and suggestions for changes can be summarized as below:

- Requirements to the simulated virtual conformity assessment;
- Language in documents used for the accreditation process;
- GSTC's capacity of limiting the technical or geographical scope in agreement with GSTC-Endorsed National Accreditation Body (NAB);
- Elaboration of the requirements of the public information revealed by CBs;
- Elimination of the requirement to use specific checklist/evaluation tool for auditing;
- To broaden the risk analysis factor and make it feasible to all types and sizes of tour operators or hotels and to allow CB discretion in risk evaluation;
- Assessment of the CB's robust procedure for assessing risk;
- Requirement of surveillance audits as remote audits or on site audits;
- Provisions of the GSTC Remote Audit Guidelines (specific definition on risk level);
- Guidelines for the sampling for TO Certification.

Summary of the key changes

- **Manual Title Change:**
 - To clarify the purpose of the Accreditation Manual, which outlines the requirements for Certification Bodies, the manual title has been revised from the previous "GSTC Accreditation Manual for Certification of Hotel/Accommodation & Tour Operator" to "GSTC Accreditation Manual for Certification Bodies - Industry: Hotel/Accommodation & Tour Operator".
- **Information Updates:**
 - Part I has been revised to include updated information on the Accreditation map along with a more detailed explanation regarding Certification Systems (CS) and recognition mechanisms.
- **Structural Changes:**
 - Scope-specific requirements have been moved to Annex C.
 - Definitions have been moved and improved for clarity, while the glossary has been consolidated into a single document that serves as a comprehensive reference for the entire glossary.

- **Geographical Scope:**
 - Clarifications were added concerning the geographical scope for CBs operating under the same brand name or headquartered under the same entity, ensuring consistent application of standards across locations.
- **Normative References:**
 - Updates have been made to the normative references to ensure alignment with the latest standards and practices.
- **Simulation of Conformity Assessment:**
 - A new clause was introduced to outline the simulation of conformity assessments for CBs that have not yet conducted any audits for actual clients.
- **Risk Factors and Nonconformities:**
 - The inclusion of social and environmental impacts as risk factors has been introduced, along with a refinement of risk definitions using qualitative statements.
 - Timelines and requirements for addressing nonconformities have also been revised.
- **National Accreditation Body (NAB):**
 - Clarification on the roles of the GSTC and GSTC-Endorsed National Accreditation Bodies in managing the accreditation process within their respective countries and outlining their association with the GSTC. Additionally, there is now a requirement for all Certification Bodies to hold accreditation from either the GSTC or, where relevant, a GSTC-Endorsed National Accreditation Body.
- **GSTC Criteria Clarifications:**
 - Clear guidelines have been added on the certification requirements related to GSTC criteria and the mandatory alignment with the equivalent criteria of the Recognized Standard Owners for conformity.
- **Auditor Qualifications:**
 - Additional qualifications for auditors have been specified.
- **Technical Review and Certification Decisions:**
 - Updates to the technical review process and the certification decision-making procedures have been implemented to streamline operations.
- **Certification Requirements and Sampling Procedures:**

- Modifications to certificate requirements have been made, including the addition of specific sampling procedures for multi-site, group, and Tour Operator (TO) certifications.
- **Evaluation Tools and Certification Ineligibility:**
 - Clarification on the requirements for evaluation tools has been provided.
- **Certification Program Updates:**
 - Clarifications and updates have been made to the Certification Program, specifically regarding the Multilevel Award System, to provide a more structured approach to certification.
- **Certification of Multi-Site Organizations**
 - The certification requirements for multi-site organizations were updated to mandate auditing of all sites throughout the three-year certification cycle.
- **Certification Bodies License Agreement:**
 - Updates to the Certification Bodies License Agreement have been made to reflect new licensing terms and conditions.
- **Revisions to Clause 8:**
 - Clause 8 has been thoroughly reviewed and updated to enhance clarity and incorporate recent procedural improvements.
- **New Annexes and Revisions:**
 - An annex has been added detailing sanctions for auditors.
 - Added a new Annex C, which includes specific requirements for the certification of C1 Hotels and Accommodations, C2 Tour Operators, and C3 Tour Products.

Between the public consultation and the online workshops, numerous internal revisions were made to the Accreditation Manual draft.

4. Conclusion and next steps

The comments and recommendations have been thoroughly reviewed and has been reflected in the GSTC Accreditation Manual for the Certification Bodies - Industry: Accommodation/Hotel & Tour Operator v.4.0. The new Manual is effective from November 1, 2024 . As of the said date only applications for initial accreditation for v.4.0 will be accepted.

A transition plan for the new version of the Accreditation Manual to take effect is outlined in the [\[Transition Requirements on the GSTC Accreditation Manual for the Certification Bodies - Industry: Accommodation/Hotel & Tour Operator v.4.0.\]](#). There is a one year period where the new requirements of the manual will be gradually integrated into the assessment process.

Annex A. Comment log and Analysis - Public Consultation + Online workshop

A list of participants in the public consultation and online workshop 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	<ul style="list-style-type: none"> Control Union Royalcert United Certification Systems Limited (UCSL) Vireo
Certification Body	<ul style="list-style-type: none"> ISOQAR
GSTC-Recognized Standard Owner	<ul style="list-style-type: none"> Ecostar Green Star Hotel Preferred by Nature TourCert Travelife Travelife for Tour Operators
Industry - Tourism	<ul style="list-style-type: none"> Royal Caribbean
Industry - Others	<ul style="list-style-type: none"> ETIFOR
International Organization	<ul style="list-style-type: none"> World Wildlife Fund (WWF)
Others	<ul style="list-style-type: none"> Individual stakeholders

Comment Log

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
1	PART 1	On page 10, add the Assurance Panel's complete functions per the GSTC bylaws—currently the following are missing: Policies and procedures for the GSTC Assurance Program shall be developed in collaboration between the	The role of AP is outlined in Accreditation Procedure.	-

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		Assurance Panel and the Secretariat. In the event that the Panel and the Secretariat cannot agree on policy issues, the Board shall determine the policy; The Panel shall operate independently of the GSTC Board and executive staff regarding specific applications.		
2	5. Introduction	Does a CB that is already certifying have to do a simulated virtual conformity assessment? Why can this not be done on an actual live conformity assessment?	The result of the public consultation are reflected to the comment, whereas the simulated virtual conformity assessment shall only be conducted for those Certification Bodies that have not yet completed a full certification process.	4.3 For initial GSTC accreditation, the CB shall demonstrate practical experience in operating its conformity assessment system. This includes having conducted at least one internal audit, one management review, and one complete conformity assessment activity. 4.3.1. If the 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 CB to assess the effective application of its procedures
3		Also other requirements for CB's management system may be added to this clause. Conducting risk analyse and conflict of interest analyse clauses should be added.		
4		Does a CB that is already certifying have to do a simulated virtual conformity assessment? Why can this not be done on an actual live conformity assessment? Typically, a simulation would only be required for a new CB or a new scheme where no prior audits had ever taken place.		
5		Internal audits should be carried out at least once a year to meet all requirements of the GSTC manual. NOTE:GSTC implementation records must show a minimum 3 months period.		
6	Section 5 - continued	We regard this clause as over-regulating. There are other appropriate orders such as the 17 SGDs. If the efforts of matching are paid on an hourly rate it should be up to the CB to either ease documents for approval or to assure it's individuality.	Recognition is the process where the Standard Owner seeks to have their standard deemed equivalent to the GSTC Standard. Therefore, the criterion requires that the equivalent standard be aligned with the GSTC Criteria to ensure consistency and compliance.	5.1.2.2. The GSTC-Recognized Standard (alternative B). In this case, all the requirements in the standard that allow for its Recognition by the GSTC are requirements and therefore mandatory for compliance. 5.1.2.2.1. For applying for accreditation and maintaining the accredited status, the identifier of the GSTC criterion shall be given next to the criterion or indicator of the Recognized standard that is equivalent to the GSTC criterion. (Example: Recognized standard criterion/indicator identifier(GSTC criterion identifier) - C2.5(GSTC B7).
7	Section 5 - continued	It is inappropriate for an AB to have a requirement simply designed to make life easier for their staff when it may be to the detriment of the CB's standard and thus, to tourism sustainability. The CB may have very good reasons for not wanting their standard to be in the same order as the GSTC criteria. Furthermore, the CB pays GSTC for the equivalency assessment with a high daily rate being imposed if this takes longer than expected. Surely, if the CB is willing to pay this rate, the GSTC should have no issues.		
8	6. Language	There is not much sense in commenting on this, but GSTC could engage better in equality and accessibility.	The clause is reflected in the comment. Whereas, if the Certification Body (CB) wishes to provide the other language, the CB shall provide interpretation and translation services and ensure that the services are fair and impartial to all CBs.	6.1. Language for Accreditation 6.1.1. The language used for the GSTC accreditation service is English. All information requested by the GSTC shall be submitted in English. 6.1.2. If a CB wishes to receive accreditation services in a language other than English, the CB shall provide interpretation and translation services, and the CB shall ensure that the services are fair and impartial. It is the responsibility of the CB to cover the expenses of translation and interpretation services.
9		No comment.		
10		6.1.1.Documents sent to GSTC can be prepared in two languages(bilingual): English and the native language.		
11	8. GSTC Requirements	We question the right to endorse NABs. We lack any details on standards and criteria for this process. Reducing the scope is a sensitive issue that should be free of any doubts. This change enhances the opportunities to reduce scopes. We oppose to that. Furthermore we oppose to justification only being provided on request.	In accordance with EU Regulation (Regulation EC No 765/2008), Certification Bodies (CBs) based in Europe are required to seek accreditation from the National Accreditation Body (NAB) of their respective country. As such, GSTC functions as a Scheme Owner (SO) within the EU and as an Accreditation Body (AB) in non-EU countries. Consequently, CBs applying for accreditation within EU countries will be	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.
12		More clarification from the AB is required here as per questions below: Typically an NAB accredits a privately operated body, so how is it possible for GSTC to 'endorse' an NAB? What is GSTC's criteria for endorsing an NAB? Is there a quality check process? Who makes that decision? Who is consulted? What are "the mutually agreed countries"? Does GSTC maintain a list somewhere? Who is overseeing GSTC's decision to endorse and NAB in order to ensure that decisions		

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		are impartial and made with the public interest, and the interests of sustainable tourism, in mind?	referred by GSTC to the relevant National Accreditation Body, whereas CBs outside the EU will be accredited directly by GSTC. This clause further stipulates that GSTC and the NAB may impose additional limitations on the technical or geographical scope of certification, either based on the justification provided or at the request of the Certification Body.	
13	8.5.1.	8.5.1. CBs should note that Accreditation Bodies have been instructed to follow the accreditation auditing guidance contained within the Accreditation Audit Practice Group's document ISO/IAF AAPG Key Criteria for assessing the competency of CBs and their ability to deliver credible results. NK: Instructed by whom?	The clause has been deleted.	-
14	8.5.7	8.5.6.1. The CB shall also maintain public information about: 8.5.6.1.1. Geographical areas in which it operates; and 8.5.6.1.2. Dispute mechanisms including complaints and appeals procedures available in the languages the CB operates. 8.5.6.1.3 The Operational Procedure for Non Conformities Management for single, group and multi-site certification 8.5.6.1.3 List of issued certificates Rationale: the CBs OPs are a fundamental part of the supplier selection, therefore they should be publicly available and easy to access. Also the list of issued certificates would be important in order to understand the competence of the supplier in relation to the clients' needs. In addition this information can help in marketing GSTC certification (e.g. through the Italy Working Group).	The new clause has been revised to reflect the suggestion. 8.5.7.1.2. Geographical areas in which it is accredited; and	8.6. Publicly available information 8.6.1. The CB shall also maintain public information about; 8.6.1.1. Technical scopes in which it is accredited; 8.6.1.2. Geographical areas in which it is accredited; and 8.6.1.3. Dispute mechanisms, including complaints and appeals procedures, available in the languages the CB operates.
15	8.5.10.1.1.	Do not agree [with what it says in clause 8.5.10.1.1.] A supplier is a different entity and might have a different branding. It is all about branding. If for example a TUI tour operator is certified it does not mean that TUI owned cruise-ships, excursions or hotels (suppliers) do have to be certified as well. Important is that no consumer confusion will take place. Internal suppliers who are part of the same legal entity and within the scope of the certification and using the same branding need to comply however from the onset as to avoid misleading claims.	The new clause has been revised to reflect the suggestion.	C2.9. In cases where the TO owns majority equity in a supplier or is under common ownership with that business, and the supplier's products and services are promoted or used frequently by the TO, the TO shall be required to follow Clause 8.7.1.1. 8.7.1.1. In cases where the client owns majority equity in a supplier or is under common ownership with that business and that supplier's products and services are promoted or used frequently by the client, it is strongly recommended that the client arrange for that business to be either; a. included within the scope of certification; or b. certified under a separate and distinct certification.
16	8.5.10.4.	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 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 businesses and activities comply with all the GSTC Criteria.	The new clause has been revised to enhance clarity. Moreover, the clause means that every requirement within the GSTC criteria, or the equivalent criteria and indicators within a GSTC-Recognized Standard, is mandatory or cannot be optional.	8.7.4. All the requirements in the GSTC criteria-equivalent criteria or indicators of the GSTC-Recognized Standard are mandatory and shall be assessed for conformity.

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		NK: not completely clear what is meant here?		
17	8.5.13.1.	Travelife will never use a third party's tools to carry out certification activities unless they, in their sole judgement, determine them to enhance the robustness and efficiency of their programme, or unless required to do so by law.	The clause has been deleted in accordance with the suggestion.	Deleted
18	8.5.13.4.	8.5.13.4. The certification cycle shall be 3 years, and the audit program shall establish, as a minimum, a surveillance audit every year and a recertification audit that shall begin during the year prior to the expiration of certification." NK: so onsite audit once every 3 years?	Please refer to 8.18.4. For further details and Annex D2 for Tour Operator	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.
19	8.5.15.4.	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. NK: Risk assessment is an extra layer of costs and bureaucracy and the question is for what problem is this a solution. Is there any proof of objective risks indicators in the travel sector? A proper certification system has taken care of potential risks by including them in the criteria and indicators. I do not experience objective indicators for risks in practice such as location of operation or countries of legal establishment.	Risk assessment shall be conducted by the CB	8.18.4. Remote audits for Surveillance Activities C2
20	8.5.15.6.	We appreciate any detailing of the risk analysis. These specification on "sensitive area" and the choice of applying only one of two do help. Yet. The focus on corruption perception or any variation of corruption indices is still to prominent. Lack to experience the the new indices we cannot evaluate it's quality. We still miss any taking into account of a audit history or the fact of being an re-audit. Furthermore we again encourage to broaden the risk analysis. The Human Rights in Tourism Initiative has published a 13 indices based approach on "risk". This could be a blue print for a more comprehensive evaluation of risks. Risk criteria (esp. corruption index) and audit frequency and duration for high-risk clients seem extremely challenging and not feasible for Certifiers. A micro tour operator from a high corruption country would automatically have to be audited on-site every year for more than two days. At the moment, it seems non-inclusive and will act as a financial barrier for establishments located in certain vulnerable areas. Discussion points and open questions: Does the risk analysis necessarily have to be linked to the auditing frequency? Would it be a feasible way forward for environmental and social risks to be assessed instead through variation in criteria (for example risk of drought/flooding, risk connected with location in sensitive biodiversity areas, etc.)? Note that the strength of certification schemes is that they have often considered these local risks and have applied them in regional or activity specific criteria and auditing guidance. For 8.5.15.6.2. This does open up opportunities, yet why not leaving a consistent and document risk evaluation to the CB then? 6.2 seems to make 6.1 unnecessary.	As the comments highlight concerns about the reliance on corruption index focus, the need for broader risk analysis, risk assessment flexibility, sensitive area definition, and the potential financial and operational impacts on businesses in high-risk areas, a. The initial audit is a crucial phase in the certification process, as it enables the Certification Body (CB) to gain a comprehensive understanding of the client's current situation and conditions. This foundational assessment, alongside the CB's classification of the status quo based on factors such as the corruption index, sensitive areas, local regulations, and secondary data, forms the basis for conducting a proper risk analysis prior to initiating certification. Proceeding with certification without this essential insight would compromise the integrity of the process. Therefore, it is vital for CBs to thoroughly assess the client's identity, location, and associated risk	8.13. Risk assessment 8.13.1. CBs shall define the client's risk level through risk assessment and each scope classification to determine audit frequency and duration. 8.13.2. Two primary risk factors which shall be considered by CBs when conducting the risk assessment are: a. The likelihood that the client's location and/or operations cause negative environmental, social, economic, or cultural impacts. b. The Rule of Law and Control of Corruption score of the country in which the client operates. <i>Note: World Bank Group provides updated Worldwide Governance Indicators including Rule of Law and Control of Corruption scores.</i> 8.13.3. The client may be considered low risk if: a. The client's location and/or operations have a minimal likelihood of causing negative environmental, social, economic, and cultural impacts, and b. The Rule of Law and Control of Corruption score of the country in which the client operates are below 60 points. 8.13.4. In addition to two primary risk categories, CBs shall ensure the client's location and/or operations in a sensitive area are considered in defining the level of risk. 8.13.4.1. CBs shall use the following lists and categories to determine sensitive areas: a. UNESCO World Heritage List. b. IUCN Protected Areas Category I to IV. c. List of Wetlands of International Importance

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		<p>For 8.5.15.6.3.</p> <p>We strongly favour to leave the tools and parameters to the CB and rely on GSTC investigation if the provided standard is convincing and sufficient. I.e. we recommend to refrain from declare any tool by the Accreditation Body as standard that is not provided beforehand and unknown at application. Measurement tools should be left to the professionalism of the CB. The system in place is then subject to accreditation. This clause should be eliminated as 6.1 and 6.4 serve the purpose sufficiently.</p>	<p>classification during the initial certification.</p> <p>The sensitive area details provided on 8.5.13.6.5.</p> <p>The Notes "Note: World Bank Group provides updated Worldwide Governance Indicators including Rule of Law and Control of Corruption scores (https://www.worldbank.org/en/publication/worldwide-governance-indicators)" provided reflecting to the request from the public consultation.</p>	<p>(Ramsar List).</p> <p>8.13.4.2. When the lists of sensitive areas are unavailable, the CB should rely on the national legislation where the client operates to determine the sensitive areas.</p> <p>8.13.5 CBs may consider other secondary data and define risk level based on the following:</p> <ol style="list-style-type: none"> Media monitoring check of the business (news classified as 'negative' will be prioritized when reviewing many overall results). Any other information gathered through online searches, social media, or networks. Any other relevant information already within the knowledge of the CB personnel. <p>8.13.6. CBs shall ensure that the determination of risk along with potential mitigation practices are documented.</p>
21		<p>It is not very clear how to define a "sensitive area" Please define for the point b. "according to the last available report"</p> <p>For 8.5.15.6.3.</p> <p>It is not very clear how to define a "sensitive area" Please define for point b. "according to the last available report"</p>	<p>In response to the comment about the business operation type, GSTC reflects Clauses 16, 17, and 18 and has established the document Guidance on Sampling TO Certification.</p>	
22		<p>8.5.15.6.1.a: Recertification/prior audits have not been factored in. If the CB has conducted a site audit of the facility within the last 3-years and/or it is a recertification audit, the auditee should automatically be considered low-risk.</p> <p>8.5.15.6.1.b: The AB should not specify which tools a CB uses. The AB should simply assess if the CB has a robust procedure in place for assessing risk and any tools or reference information being used by the CB are both reputable and relevant. Again, per comments for 8.5.15.6.1.a, the AB has not factored in recertification audits/recent audit history. This requirement should be eliminated because it serves no real purpose in terms of improving tourism sustainability, with 8.5.15.6.1.a + 8.5.15.6.4 being sufficient.</p> <p>For 8.5.15.6.2.</p> <p>Agreed, however this poses a question about the rationale for the existence of requirements 8.5.15.6.1.b. + 8.5.12.12 + 8.5.12.13 etc.? The AB only ever needs to verify that the CB can provide sound rationale for their risk assessments.</p> <p>For 8.5.15.6.3.</p> <p>8.5.15.6.3.a: No comments. 8.5.15.6.3.b: (per comments for 8.5.15.6.1.b) The AB should not specify which tools a CB uses. The AB should simply assess if the CB has a robust procedure in place for assessing risk and any tools or reference information being used by the CB are both reputable and relevant. Again, per comments for 8.5.15.6.1.a, the AB has not factored in recertification audits/recent audit history. This requirement should be eliminated because it serves no real purpose in terms of improving tourism sustainability, with 8.5.15.6.1.a + 8.5.15.6.4 being sufficient.</p>	<p>b. The tools provided establish a baseline for CBs to ensure a consistent approach when conducting certification and risk assessments. Clause 8.5.13.5.2 of the Manual also allows flexibility for CBs to justify if they determine that a client is in a low-risk situation. CBs are required to implement SMS that outlines each step and cycle of the certification process. Additionally, CBs must establish their own risk management system to effectively address and manage potential risks.</p> <p>c. In response to the potential financial impacts associated with sampling for Tour Operators (TOs), GSTC has provided and shared the GSTC Sampling Guidelines for TO Certification. These guidelines take into account factors such as the number of employees and the operational status of the TO's. In response to concerns raised about the operational impact on businesses in high-risk areas, it is essential to ensure that such businesses operate in a way that minimizes disruption to environmental, social, or economic conditions in these sensitive regions. Therefore, sampling plays a critical role in offering a</p>	
23		<p>Records of justification should be kept in the audit file (for 8.6.15.6.2.</p>		
24		<p>For 8.5.15.6.2.</p> <p>Point a, remain unclear and difficult to define, especially at application phase. More objective criteria are suggested Point b, please include the official source of data</p>		

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		<p>For 8.5.15.6.3.</p> <p>Point a, remain unclear and difficult to define, especially at application phase. More objective criteria are suggested Point b, please include the official source of data</p>	<p>comprehensive perspective of the client's compliance, providing a more thorough assessment of their practices and impact in these high-risk areas.</p>	
25		<p>Adjust overly prescriptive formulas and determinants for risk to allow certification body (CB) discretion in the risk evaluation. For example, if companies will be automatically relegated as high risk based on their country's BSCI Rule of Law and Control of Corruption score, explicitly allow the CB to consider mitigating factors such as governance safeguards the company may have in place to transcend the country context, based on the CB's discretion and expertise. Provisions such as 8.5.15.6.2. do not provide strong enough basis for CB variance from prescriptive provisions above it, so if CB discretion is intended to be allowed—which WWF recommends—better to spell out within the primary text of the guidance a wider range of factors to guide CB on what they may take into account when making their particularized determination in a client's case.</p> <p>If GSTC decides the country score must be determinative for the initial audit, at least allow the CB to adjust the client's risk determination following the initial audit, based on the client's demonstration of safeguards that address the risks in the country context.</p>	<p>d. The new revision reflects the comment from WWF.</p> <p>8.5.13.6.1. CBs shall include the following among the risk factors used to define the level of risk of the client.</p> <p>a. Whether the client's location and/or operations have a significant likelihood of causing negative environmental, social, economic, and cultural impacts.</p> <p>b. The Rule of Law and Control of Corruption score of the country in which the client operates.</p> <p>8.13.7. CBs shall document determination of risk based on factors noted in 8.5.13.6., along with other risk factors and corresponding mitigation practice.</p>	
26		<p>8.5.15.6 Manual provision 8.5.15.6 could read, for example:</p> <p>"8.5.15.6. CBs shall conduct a risk assessment appropriate to the nature, scale and complexity of the tourism activity, and may consider risk factors such as the following when conducting the risk assessment:</p> <ul style="list-style-type: none"> Number of sites where the business operates Size of the business Whether negative environmental, social, economic and cultural impacts have significant likelihood and consequences The client's country of operation score on BSCI Rule of Law and Control of Corruption Whether the client is located or operates in a Sensitive Area, and how well regulated or carefully managed tourism activities are in that area. Sensitive Areas include but are not limited to World Heritage listed areas, areas set aside for environmental and/or cultural protection, marine parks, beaches, rivers, lagoons, wetlands/swamps, alpine/arctic areas, tropical islands/coral reef, national/state parks, areas set aside for indigenous people or specific national and state or regional environmental, social and cultural legislation requirements, or any other factor that is considered high risk by the CB as per the location and the activity of the client Mitigating factors such as governance safeguards that the CB determines reduce the risks posed in the client's case. <p>The risk evaluation is subject to the discretion of the CB. The CB may adjust the client's risk determination, including following the initial audit, and therefore adjust the CB's approach to audits (type, duration, focus) based on the risk evaluation."</p>		
27		<p>Globally, review instances of "shall" and ensure "shall" is used only when "must" is meant. For example, in provision 8.5.15.6.5. recommend replacing "shall" with "may" since the list provided is not exhaustive.</p>		

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		<p>BSCI Country Risk Classification. WWF has been unable to find or access this resource. Could you please share the resource or point to where it can be found? Would it make sense to reference where it can be found as their website is not intuitive? It would also be helpful to understand why this resource was chosen over others.</p>		
28		<p>"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."</p> <p>NK: Risk assessment is an extra layer of costs and bureaucracy and the question is for what problem is this a solution. Is there any proof of objective risks indicators in the travel sector? A proper certification system has taken care of potential risks by including them in the criteria and indicators. I do not experience objective indicators for risks in practice such as location of operation or countries of legal establishment.</p>		
29		<p>"8.5.15.6.1 a. If either of the two aspects listed in this clause apply, the client shall be considered high risk: When the client's location and/or operations have a significant likelihood of causing negative environmental, social, economic, and cultural impacts in a sensitive area."</p> <p>NK: how is this defined? Conduct in sensitive areas is part of normal certification process, it is what certification is about! Not clear why this is than high risk. Tourism is not like mining or cloth production where there are extra-ordinary higher risk in certain countries or geographical locations. All risk factors are included in the criteria and indicators which in the case of Travelife are all pre-assessed in a lengthy process before onsite audit is launched. Specific risk will be taken into account as part of defining the scope of the audit.</p> <p>"8.5.15.6.1 b. When the Rule of Law and Control of Corruption scores of the country in which the client operates are below 60 points according to Business Social Compliance Initiative (BSCI) Countries Risk Classification."</p> <p>NK: this is all the developing world with some exceptions (e.g. Bhutan)</p> <p>"8.5.15.6.2 If the client falls under the above cases but is not classified as high risk, the CB shall provide a rationale."</p> <p>NK: need guidance for this. It is an additional layer of bureaucracy and can be subject to different approaches by certification schemes.</p> <p>"8.5.15.6.3 a. If the two aspects listed in this clause apply, the client may be considered low risk: When the client's location and/or operations have minimal likelihood of causing negative environmental, social, economic, and cultural impacts in a sensitive area."</p> <p>NK: how to define this? See above?</p>		

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30		<p>"8.5.15.6.3 b. When the Rule of Law and Control of Corruption of the country in which the client operates are both above 60 points according to BSCI Countries Risk Clarification."</p> <p>NK: this is not changing the list, all but a few developing countries remain in the high risk list.</p> <p>"8.5.15.6.4 CBs shall ensure the client's location and/or operations in a sensitive area are considered in defining the level of risk."</p> <p>NK: this was mentioned before</p> <p>"8.5.15.6.5 CBs shall use the following lists and categories to determine sensitive areas: UNESCO World Heritage List. IUCN Protected Areas Category I to IV. List of Wetlands of International Importance (Ramsar List)."</p> <p>NK: so this is limited, however outbound operators operating in multiple countries always operate in such area somewhere. These areas are sensitive, but also protected by international law. Real risks are in non-protected but still valuable areas.</p>		
31		<p>RCG sees limiting scope based on defining risk instead of including factors that contribute to risk as being too prescriptive of CBs. In addition, media monitor and social media does not influence the sustainability of the site but can speak to the operation of the tour. While useful only including negative reviews should not be allowed. If these types of topics are included the totality of information should be considered (positive and negative) in the assessment. Based on that recommendation and earlier recommendations on risk consolidation, RCG would suggest consolidating 8.5.15.6. 8.5.15.6.1., 8.5.15.6.2, 8.5.15.6.3., 8.5.15.6.4., 8.5.15.6.5., 8.5.15.6.6., 8.5.15.6.7. and 8.5.15.8. to read as follows:</p> <p>"8.5.15.6 CBs may consider the following risk factors when conducting the risk assessment:</p> <ol style="list-style-type: none"> a. Number of sites where the business operates b. Size of the business c. When negative environmental, social, economic and cultural impacts have significant likelihood and consequences. d. When the Rule of Law and Control of Corruption scores of the country in which the client operates are below 60 points according to Business Social Compliance Initiative (BSCI) Countries Risk Classification. e. Sensitive areas including but are not limited to UNESCO World Heritage List areas, IUCN Protected Areas Categories System, List of Wetlands of International Importance (Ramsar List), areas determined by the national legislation to be sensitive or any other factor that is considered high risk by the CB as per the location and the activity of the client. f. Mitigating factors that the CB determines reduce the risk posed in the client's case. The risk evaluation is subject to the discretion of the CB. The CB may adjust the client's risk determination over time, and therefore adjust the CB's approach to audits (type, duration, focus) based on the risk evaluation. <p>Adjustments to the risk designation should be considered after successful completion of one audit cycle, which is original certification audit, surveillance</p>		

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		<p>audit and renewal audit. All levels of risk are subject to ratification by the CB."</p> <p>8.5.15.4 RCG recommends on consolidating risk management factors into one section and allowing a path for the CB to adjust the risk determination following the initial audit, for purposes of future requirements including for recertification and surveillance.</p> <p>Following this recommendation, RCG suggests 8.5.15.4 to read: 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.</p>		
32		<p>Risk Assessment and Corruption Perceptions Index (CPI)</p> <p>If a tour operator or hotel operates in a country with a low CPI score, does this automatically categorize it as a high-risk case, even if other conditions or factors suggest a low-risk profile?</p>		
33		<p>it seems that risk assessment is very subjective thing - one CB can decide according to their vision low risk and lead to remote audit and other CB can decide medium or high risk and lead to completely different outcome.</p>		
34		<p>According to Clause 8.5.13.6: "CBs shall rely on the following two primary risk categories when conducting the risk assessment:</p> <p>8.5.13.6.1. If either of the two aspects listed in this clause apply, the client shall be considered high risk:</p> <p>a. When the client's location and/or operations have a significant likelihood of causing negative environmental, social, economic, and cultural impacts in a sensitive area.</p> <p>b. When the Rule of Law and Control of Corruption scores of the country in which the client operates are below 60 points according to Business Social Compliance Initiative (BSCI) Countries Risk Classification."</p> <p>Our Question (after answer above we are even more confused):</p> <ul style="list-style-type: none"> - Does the use of "shall" indicate a compulsory requirement for classifying a client as high risk if either condition (a) or (b) is met? - Could the term "shall" in this clause be interpreted as "could" to allow for flexibility in the risk assessment process, or is it strictly mandatory? 		
35		<p>Why can the Global Corruption Perceptions Index be used to assess country risk?</p>		
36		<p>We understand from the earlier webinar session that the BSCI Rule of Law and Control of Corruption index score is not intended to be prescriptively determinative of the business's risk, but rather the country score is one of the factors the CB may take into account in assigning risk. Is that correct? We suggest changing the language of provision 8.5.13.6.1. to clarify this. For example "The following aspects are factors, among others, that the CB should consider in determining the client's risk."</p>		
37		<p>Corruption index is very stable index! it is not changing yearly but rather decades. Even there are none nonconformities, index still the same (HIGH) - so still onsite audit?</p>		
38		<p>1. Risk Evaluation: There is a disconnect and inherent contradictions between key provisions in the draft regarding risk evaluation. After submissions of written feedback and several stakeholders pointing out this contradiction in the text during the webinars held by the Accreditation Team on July 3, the revised draft issued by</p>	<p>The clause has been revised in accordance with the suggestion. 8.5.13.6.1. CBs shall include the following among the risk factors used to define the level of risk of the client.</p>	

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		<p>GSTC following the webinars retains this problematic language, despite the fact that this seems contradictory to the intent noted by GSTC during its public webinars.</p> <p>This is a prescriptive assignment of a high-risk designation for clients who meet one of the two conditions described above. This is a very specific formula for determining risk, not a list of factors the CB may take into account.</p> <p>In contradiction, in the text of this latest revised draft, GSTC stated that "8.5.13.8. All levels of risk are subject to ratification by the CB. The two primary risk categories described in Clause 8.5.13.6 shall be included in the risk factors used by the CB to define the level of risk of the client."</p> <p>According to comments made by GSTC during the first session of the public webinars (recording timestamp 01:03:10), we now understand that GSTC's intent is for conditions (a) and (b) of provision 8.5.13.6.1 to be important "factors" the CB shall take into account. Since that is the case, then the provision should describe those two conditions as factors to be included and considered, rather than state a prescriptive formula for how a certain country risk score automatically "shall" dictate a high-risk designation. Further, during the second webinar session (recording time stamp: 01:06:15) GSTC also shared it would be acceptable to use discretion to lower/redetermine risk after initial audits. Though we don't believe this needs to be stated explicitly in the Manual, it should be included as a practical example for how the criteria could be applied/interpreted.</p> <p>Provision 8.5.13.6.2. further describes that CBs can justify deviation, "If the client falls under the above cases but is not classified as high risk, the CB shall provide a rationale." We suggest clarifying provision 8.5.13.6.1 if the intent is to grant the CB discretion (see example language below).</p> <p>WWF suggests alternate language to meet GSTC's stated intent, for example: 8.5.13.6.1. "The CB shall include the following among the risk factors used to define the level of risk of the client: a. Whether the client's location and/or operations have a significant likelihood of causing negative environmental, social, economic, and cultural impacts in a sensitive area. b. The Rule of Law and Control of Corruption score of the country in which the client operates according to Business Social Compliance Initiative (BSCI) Countries Risk Classification." 8.5.13.6.2 "The CB shall document determination of risk based on factors noted in 8.5.13.6.1., along with other risk factors and corresponding mitigation practices (or lack thereof)."</p>	<p>a. Whether the client's location and/or operations have a significant likelihood of causing negative environmental, social, economic, and cultural impacts. b. The Rule of Law and Control of Corruption score of the country in which the client operates. 8.13.7. CBs shall document determination of risk based on factors noted in 8.5.13.6., along with other risk factors and corresponding mitigation practice.</p>	
39		<p>2. Rule of Law and Corruption Index as Risk Factor: Another unclear aspect is that, while GSTC points to BSCI as the index the CB "shall" use, in the very next sentence, GSTC includes a note: "Note: World Bank Group provides updated Worldwide Governance Indicators including Rule of Law and Control of Corruption scores (https://www.worldbank.org/en/publication/worldwide-governance-indicators)"</p> <ul style="list-style-type: none"> • Which index is the CB supposed to use (BSCI or World Bank)? • Is it up to the CB to choose which index to use? • BSCI is not easily accessible, we have not been able to find or access this index. <p>*** Practical Examples: GSTC needs to add illustrative examples to demonstrate how CBs are expected to implement the more intricate parts of the Accreditation Manual. This will show how the provisions are intended to apply, and the degree of</p>	<p>The new clause reflects the suggestion, b. The Rule of Law and Control of Corruption score of the country in which the client operates. Note: World Bank Group provides updated Worldwide Governance Indicators including Rule of Law and Control of Corruption scores (https://www.worldbank.org/en/publication/worldwide-governance-indicators)</p>	

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		discretion CBs are permitted to exercise—for example, when applying the risk evaluation provisions under various circumstances. For guidance on the types of examples that would be helpful to accompany the Manual, see, for example: https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-issues-revise-d-green-guides/greenguides.pdf (examples are noted starting on page 4).		
40		<p>8.5.13.6.</p> <p>a) Recertification/prior audits have not been factored in. If the CB has conducted a site audit of the facility within the last 3-years and/or it is a recertification audit, the auditee should automatically be considered low-risk.</p> <p>b) The AB should not specify which tools a CB uses. The AB should simply assess if the CB has a robust procedure in place for assessing risk and any tools or reference information being used by the CB are both reputable and relevant. Again, per comments for 8.5.15.6.1.a, the AB has not factored in recertification audits/recent audit history.</p>	<p>a. The initial audit is a vital component of the certification process. It enables the Certification Body (CB) to gain a comprehensive understanding of their client's current circumstances and conditions. This foundational knowledge is crucial for accurately assessing factors such as the client's operations, location, and potential risks. Proceeding with certification without this essential understanding could compromise the integrity of the certification process. Therefore, it is essential that CBs conduct a thorough evaluation of who the client is, where they are located, and the appropriate risk classification during the initial certification stage.</p> <p>b. The role of the GSTC as an Accreditation Body (AB) is to provide tools that serve as a baseline for CB. These tools ensure a consistent approach across all CBs when conducting certifications and risk assessments. Clause 8.5.13.12.3 of the AM also allows flexibility for CBs to justify if they determine that a client is in a low-risk category. CBs are required to implement a SMS/procedure/guidelines/policy that outlines each step and cycle of the certification process. Additionally, CBs must establish their own risk management systems to effectively address and manage potential risks.</p>	
41		<p>8.5.13.6.3.</p> <p>Again, A. and B. do not consider certification history, and this must be considered.</p>	The Certification Body (CB) shall provide its own management system to address this matter.	
42		Globally, review instances of "shall" and ensure "shall" is used only when "must" is meant. For example, in provision 8.5.15.6.5. recommend replacing "shall" with "may" since the list provided is not exhaustive.	The new clause has been revised to reflect the suggestion.	
43		Maintain consistency in language across provisions addressing the same topic, for example refer in terms of either "low-risk" or "high-risk" (rather than switching between the two) when determining surveillance audit details across hotel and tour operator categories.	The new clause has been revised to reflect the suggestion.	
44	8.5.15	Does this section refer to when a certification is issued straight away, even if there are nonconformities?	Unfortunately, the certificate cannot be issued if there are any non-conformities (NCs). Certification can only be granted	-

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			once all NCs have been closed. The client is required to address and close the NCs within 90 days	
45	8.5.15.8. - 8.5.15.9	<p>8.5.15.8 All levels of risk are subject to ratification by the CB. The two primary risk categories described in Clause 8.5.15.6 shall be used to define the level of risk of the client.</p> <p>8.5.15.8. NK: it gets all very complicated with this risk level assessments method. Is it based on any international requirements?</p> <p>8.5.15.9 Travel time to and from audited sites shall not be included in determining the audit time."</p> <p>8.5.15.9. NK: what about pre-assessment of documents which have been shared by the company (online)? Seems logical to accept this as auditing time, although it is not onsite.</p>	<p>8.5.15.8. Yes, all CBs implement this risk level assessment method.</p> <p>8.5.15.9. Pre-assessment is not included in audit time. Audit time shall include assessment of documentation in any case.</p> <p>10/06 performing review of documented information (ISO 19011, 6.3.1) is not included in audit plan if conducted before the audit because it is done in order to finalize the audit plan.</p>	-
46	8.5.15.6.7.	We appreciate to include secondary data.	Since this requirement is optional rather than mandatory, the wording reflects that "the Certification Body (CB) may consider".	<p>8.13.2. Two primary risk factors which shall be considered by CBs when conducting the risk assessment are:</p> <ul style="list-style-type: none"> a. The likelihood that the client's location and/or operations cause negative environmental, social, economic, or cultural impacts. b. The Rule of Law and Control of Corruption score of the country in which the client operates. <p><i>Note: World Bank Group provides updated Worldwide Governance Indicators including Rule of Law and Control of Corruption scores.</i></p>
47		<p>points a and b are too wide. A certification body may be found not to be in compliance if it has missed a piece of news or a post that comes from a social media, perhaps unverified. It would be appropriate to better define which news portals are to be taken into consideration</p> <p>vague requirement, unclear and which leaves too much room for interpretations. It is necessary to define more objective criteria</p>		
48		<p>With a slight tweak to wording, this could replace 8.5.15.6.5 + 8.5.15.6.6 for the reasons below: 8.5.15.6.5: The AB should refrain from these types of references because they do not take into account all possible scenarios yet are oddly specific about certain scenarios. For example, any coral reef or sand dune is sensitive – it does not need to be on an international list for a CB or auditor to be factoring that in. Furthermore, the AB is focused only on environmental sensitivity and has not factored in communities and human rights. For example, if the auditee is in a location with a high number of refugees, it is a sensitive location for human rights in terms of labour exploitation and other forms of human exploitation and abuse that any good CB will be factoring in during the audit planning and auditor assignment process – yet the AB is completely silent on this issue. Likewise for locations where the abuse of animals in tourism is widespread. This requirement should be eliminated because it serves no real purpose in terms of improving tourism sustainability, with 8.5.15.6.1.a + 8.5.15.6.4 being sufficient. 8.5.15.6.6: Again, the AB is being very specific about environmentally sensitive areas but has not factored in any other sustainability issues. The AB has also not considered the fact that often the locations that present the highest risks are those that lack robust environmental, labour or human rights legislation. This requirement should be eliminated because it serves no real purpose in terms of improving tourism sustainability, with 8.5.15.6.1.a + 8.5.15.6.4 being sufficient.</p>		
49		d. If there are environmental violation penalties previously given by legal authorities		
50	8.5.15.11.	Surveillance audits should always be open to remote unless there is any evidence for physical inspection of conformity. Remote surveillance should not be limited to risk-category. Further details go into the right direction.	The clause has been revised in accordance with the suggestion.	8.14.3 Initial and re-certification audits shall be conducted on-site

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51		<p>clear even if a little convoluted. Wouldn't it be better to allow remote/hybrid for low or extremely low according to NCs raised in the previous audit or always on site at RA audit?</p> <p>too much and unnecessarily complex requirement. I suggest making it simpler defining simpler and clearer rules on when an audit must be done in presence or remotely. I suggest limiting remote audit as much as possible because they do not allow to adequately verify a hotel. I suggest the possibility of the Audit remotely only for Extreme Low Risk. I also suggest not to predict the form of hybrid audit: I don't understand how this form of audit should be applied (what is it remotely done? What do you give in presence?).</p>		
52		<p>8.5.15.11.1: No comments 8.5.15.11.2: Surveillance audits should always be able to be done remotely unless the CB identifies a non-compliance that would specifically require a physical site inspection. For example, a report that the property is not properly managing wastewater, is dumping solid waste illegally or is engaged in labour exploitation (possibly necessitating staff interviews and an inspection of staff accommodation). 8.5.15.11.3: It seems odd that the AB is requiring surveillance audits to be conducted onsite if the property is not low risk (by the AB's definition of low risk) yet is permitting an entire certification to be issued without an inspection of low-risk properties. 8.5.15.11.4: No comment. 8.5.15.11.5: With a small tweak, this text could form the entirety of clause 8.5.15.11 because it should be for the CB to determine audit type based on the CB's risk assessment, with the AB checking that the CB has robust and consistent processes in place that the correct audit type and duration are utilised to make reliable and consistent conformity decisions. 8.5.15.11.6: What are the GSTC Remote Audit Guidelines? They are not attached as an annex and, as such, we cannot comment on this.</p>		
53		<p>Remove any on-site audit requirement. It is unnecessary with current digitalization and tech tools, and it massively limits ability and time taken for hotels to certify.</p>		
54		<p>Two consecutive audits cannot be performed remotely. Initial audit must be conducted on site audits, first surveillance can be remote, second surveillance must be on site audit. Recertification audit must be onsite audit again. Remote audits are experiences whose effectiveness decreases depending on many factors. Therefore, audits should take place on-site as much as possible.</p>		
55		<p>RCG recommends providing more flexibility for the CB to conduct surveillance audits remotely when it deems appropriate and removing prescribed duration for a "normal" audit. In addition, defining low risk audits should be at the CB's discretion in risk analysis. As such, RCG recommends removing entirely 8.5.15.13.4, 8.5.15.14.4, 8.5.22.4 and 8.5.22.6. Based on this recommendation, 8.5.15.11, 8.5.15.13, 8.5.15.14 and 8.5.22 would read as follows:</p> <p>"8.5.15.11. CBs shall conduct audits as follows: 8.5.15.11.1. Initial Audit shall be conducted on-site. 8.5.15.11.2. Surveillance Audits may be performed remotely or in a hybrid format based on the CB's risk assessment. 8.5.15.11.3. The first and second re-certification audits may be performed remotely or in a hybrid format based on the CB's risk assessment. 8.5.15.11.4. The third re-certification audit shall be performed on-site or as a hybrid audit. 8.5.15.13. When the scope of certification is TO : 8.5.15.13.1. On-site audits shall follow Clause 8.5.15.11. Surveillance audits shall occur annually. 8.5.15.13.2. Audits shall be set for a duration at the discretion of the CB based on risk evaluation, elements to be audited, and other factors as appropriate. The CB</p>		

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		<p>determination of audit duration shall be justified.</p> <p>8.5.15.13.3. Surveillance audits may be conducted remotely, in a hybrid format, or on-site, depending on the CB's risk assessment of the TO.</p> <p>a. The CB may conduct a remote audit following the GSTC Remote Audit Guidelines and IAF MD4:2022.</p> <p>8.5.15.14. When the scope of certification is Tour Product (TP):</p> <p>8.5.15.14.1. On-site audits shall follow Clause 8.5.15.11. Surveillance audits shall occur annually.</p> <p>8.5.15.14.2. Audits shall be set for a duration at the discretion of the CB based on risk evaluation, elements to be audited, and other factors as appropriate.</p> <p>8.5.15.14.3. Surveillance audits may be conducted remotely, in a hybrid format, or on-site, depending on the CB's risk assessment of the TP.</p> <p>8.5.22. The GSTC Requirements to ISO 17065:2012 Clause 7.9:</p> <p>8.5.22.1. Surveillance audit shall occur annually. Surveillance audits may be conducted remotely, or hybrid, at the discretion of the CB.</p> <p>8.5.22.2. Surveillance audits shall follow the requirements set out in Clause 8.5.15.</p> <p>8.5.22.5. Surveillance audits can be performed on-site, remotely or a combination of both. The CB shall provide clear justification of the chosen methods for remote and on-site audits:</p> <p>8.5.22.5.1. For remote audits, the CB shall only cover Section A, D1 and D3 in the GSTC Industry Criteria.</p> <p>8.5.22.5.2. For on-site audits, the CB shall ensure that social, cultural and environmental sensitive criteria in Section B, C and D3 of the GSTC Industry Criteria are covered.</p> <p>8.5.22.7. The date of the first surveillance audit following initial certification shall not be more than 24 months from the last day of the audit.</p> <p>8.5.22.8. Surveillance audits are not necessarily full sustainability management processes audits. Surveillance audits may focus on key processes, a portion of the client's organization and/or sensitive issues. In the 3-year certification cycle, all requirements shall be covered.</p> <p>8.5.22.9. Surveillance audits can use remote auditing techniques. In this case, IAF MD 4:2022 shall be used.</p> <p>8.5.22.10. The CB may undertake random unannounced monitoring visits; and</p> <p>8.5.22.11. The CB shall maintain certification based on the demonstration that the client continues to comply with the Reference Standard."</p>		
56		<p>Provide flexibility for the CB to conduct surveillance audits remotely when it deems appropriate. The Manual could read, for example, "Surveillance audits may be conducted remotely at the discretion of the CB," next to where the Manual specifies that surveillance audits shall occur annually.</p>		
57		<p>"8.5.15.11.2 Surveillance Audits may be performed remotely or in a hybrid format if the client is assessed as low-risk or extremely low-risk based on the CB's risk assessment."</p> <p>NK: So in all developing countries a yearly onsite audit needs to be conducted as all these country are part of high risk.</p> <p>"8.5.15.11.3 The first and second re-certification audits may be performed remotely or in a hybrid format if the client is assessed as low-risk or extremely low-risk based on the CB's risk assessment."</p> <p>NK: for a hotel the risk is not pre-dominantly related to location or country. This means that an onsite audit in a low risk country / location (e.g. hotel in Amsterdam) needs to be done only once every 9 (!) years. Any hotel audit needs to be done onsite as this can otherwise easily be cheated. A hotel is never "low risk" as much depends on daily application of management rules by staff.</p>		

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		<p>"8.5.15.11.5 Based on the CB's risk assessment, the CB shall determine if the fourth and subsequent re-certification audit will be conducted on-site, remotely, or in a hybrid format."</p> <p>NK: so this means: Year 1 onsite audit; Year 9 onsite audit; following years no onsite audit anymore.</p>		
58	8.5.15.12.	<p>Again surveillance audits should be remote due to type not to risk. On-site inspection cause associated environmental loads that seem inappropriate. When referring to GSTCs high/low risk scheme again here we must say that the specifications of low and high are not sufficient and remain unclear for a majority of cases. So far some of the worst and most common risks have not been included (human rights and labour issues as well as social cultural dimensions) yet has been highly specific about those that only apply in a small number of cases. We miss the provision of "GSTC Remote Audit Guidelines" and are unable to comment on that and therefore oppose to the reference here.</p> <p>For 8.5.15.12.6.</p> <p>We ask for further specifications on the definition of low and high risk as we cannot see how this linked to the credibility of a certification decision, the audit duration or the auditor qualification. We miss aspects like an audit history or recertifying a current certification as relevant factors.</p>	<p>The revision addresses and incorporates feedback from the public consultation with specific updates applied to the clauses from Section 16.</p> <p>a. The low and high-risk factors have been detailed in clauses from Section 8, which covers the basic risk assessment, and in clauses from Sections 16, 17, and 18, which pertain to specific certification requirements.</p> <p>b. Additionally, a specific list of risks for extremely low-risk conditions has been included in response to public consultation feedback, as outlined in Clause 16.6.</p>	Newly revised- Annex C1 Requirements Specific to Hotel Accommodation
59		<p>8.5.15.12.3: low risk? 8.5.15.12.5 it is allowed the manage on-site audit even in Extremely low risk hotel?</p> <p>For 8.5.15.12.6.</p> <p>Can you better define c. Locally owned? It is clear that the H shall not belong to a chain, but what you mean with locally?</p>		
60		<p>It may be mentioned at least more than 1 day onsite without reporting, desk review issues etc. And calculation parametres should be added. This sentence is not clear and doesn't give an idea about the calculation points. Which criteria effects the audit duration? Number of staff, location, size of business, environmental issues, translator need, remote audit (if applicable) etc?</p>		
61		<p>8.5.15.12.1: See comments for 8.5.15.11 8.5.15.12.2: Surveillance audits should always be able to be done remotely unless the CB identifies a non-compliance that would specifically require a physical site inspection. For example, a report that the property is not properly managing wastewater, is dumping solid waste illegally or is engaged in labour exploitation (possibly necessitating staff interviews and an inspection of staff accommodation). Otherwise, travel is being carried out (with its associated environmental cost) for no reason. 8.5.15.12.3: Agreed but only if the issues under how a CB determines low or high risk are addressed by the AB. The AB has not properly factored in some of the worst and most common risks yet has been highly specific about those that only apply in a small number of cases.</p> <p>8.5.15.12.4: See comment for 8.5.15.12.3 8.5.15.12.5: See comment for 8.5.15.12.3 and what are the GSTC Remote Audit Guidelines? Cannot comment on them unless we have seen them.</p> <p>For 8.5.15.12.6.</p> <p>8.5.15.12.6: The AB should perhaps provide rationale for their definition of 'low risk' and 'extremely low risk) because it is difficult to understand how this contributes to the credibility of a CB's certification decision or affects how long an audit should take or the auditor competencies. A good CB will be considering far more than this so surely the Abs role is to ensure that the CB is properly</p>		

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		<p>considering all risks when making decisions. For example, a hotel that meets the 'extremely low-risk' criteria provided by the AB could easily be allowing chemicals into the ocean from cleaning or refuelling activities that causes serious long-term harm to biodiversity in their location. They could be engaged in modern slavery and overlooking guests behaving inappropriately with local children. Conversely, a 500 room property could be actively cleaning up pollution in their destination, investing in renewable energy, providing jobs to locals and educating people about protecting children and the environment. Finally, the AB has not factored in audit history and recertifying a current certification – both of which drastically lower the risk of any audit, regardless of the property size. As per earlier comments, the AB should not define low or high risk, but assess that the CB has robust and consistent procedures in place for assessing this risk.</p>		
62		<p>Remove any on-site audit requirement. It is unnecessary with current digitalization and tech tools, and it massively limits ability and time taken for hotels to certify.</p>		
63		<p>The cost of independent, third-party certification is relatively high for small enterprises. Moreover, the potential environmental and social impacts of small enterprises are, on average, relatively low. To reduce certification costs for such small and low risk enterprises, permits shall be granted to certification bodies to evaluate and report on these businesses using streamlined certification procedures (e.g. by avoiding the application of some GSTC criteria). This follows a well-established practice in certification schemes such as in FSC certification for SLIMF (Small and Low Intensity Managed Forests) Forests (https://connect.fsc.org/slimf-standard). The statement "In the case of micro and community-owned tourism businesses which have a small social, economic and environmental footprint, it is recognized that limited resources may prevent comprehensive application of all criteria." is too vague to ensure the impartiality of the audit: a clear definition of the categories included in "small enterprises" and the GSTC criteria that are exempted must be given. A suggestion of the small and low risk enterprises (derived from the definitions of low risk included in the Accreditation manual) and of the GSTC criteria to be exempted is the following: Eligibility criteria for small and low risk enterprises The client's location and/or operations may be considered to have minimal likelihood of causing negative environmental, social, economic and cultural impacts in a sensitive area if the following conditions are met: o Twenty (20) or fewer guest rooms o OR Five (5) or fewer staff (full-time equivalent); o AND No meetings, weddings, or function spaces and activities; o AND Locally owned but not belong to a multi-site organization; o AND No Operating tours, OR Operating tours in a small geographical area like a village, town, or city with a limited population and businesses OR Operating ten (10) or fewer fixed tours using less than 50 suppliers.</p>		
64		<p>Remove prescribed duration for audits, given audit duration depends on various factors the CB will determine (e.g., risk, number of tours, etc.). If GSTC is to prescribe duration for audits, provide ranges specifying the assumptions underlying the suggested audit durations. The Manual provision 8.5.15.13.2. could read instead, for example, "Audits shall be set for a duration at the discretion of the CB based on risk evaluation, elements to be audited, and other factors as appropriate. Audits should be at minimum ½-day (4 hours). The CB's determination of audit duration shall be justified."</p>		
65		<p>Consolidate sections or sub-sections addressing the same topic into the same section or sub-section of the GSTC Accreditation Manual (Manual), for clarity and ease of reference. For example, consolidate sections relating to risk management factors into one section and delete additional provisions on risk assessment from</p>		

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		elsewhere in the document. Another example is sub-sections 8.5.15.12.2. and 8.5.15.12.4. relating to surveillance audits of hotel/accommodations— should be consolidated. Eliminate redundancies such as 8.5.15.5. and 8.5.15.7. (or if they have unique meanings somehow but relate to the same topic—make sure to clarify for ease of understanding).		
66		<p>"8.5.15.11.2 Surveillance Audits may be performed remotely or in a hybrid format if the client is assessed as low-risk or extremely low-risk based on the CB's risk assessment."</p> <p>NK: So in all developing countries a yearly onsite audit needs to be conducted as all these country are part of high risk.</p> <p>"8.5.15.11.3 The first and second re-certification audits may be performed remotely or in a hybrid format if the client is assessed as low-risk or extremely low-risk based on the CB's risk assessment."</p> <p>NK: for a hotel the risk is not pre-dominantly related to location or country. This means that an onsite audit in a low risk country / location (e.g. hotel in Amsterdam) needs to be done only once every 9 (!) years. Any hotel audit needs to be done onsite as this can otherwise easily be cheated. A hotel is never "low risk" as much depends on daily application of management rules by staff.</p> <p>"8.5.15.11.5 Based on the CB's risk assessment, the CB shall determine if the fourth and subsequent re-certification audit will be conducted on-site, remotely, or in a hybrid format."</p> <p>NK: so this means: Year 1 onsite audit; Year 9 onsite audit; following years no onsite audit anymore.</p> <p>"8.5.15.12.3 Audit shall be more than one (1) day for high-risk situations. Exceptions are allowed for extremely low-risk cases following Clause 8.5.15.12.6."</p> <p>NK: OK, so one day audit for normal situations? Unclear statement.</p> <p>"8.5.15.12.5 If a client is classified as extremely low-risk, the CB may conduct a Remote Surveillance audit following the GSTC Remote Audit Guidelines for the H/A and IAF MD 4:2022. If the client has some conformity issues, but the CB can justify a hybrid audit, they may opt for a hybrid."</p> <p>These clauses are repeating what is under 8.5.15.11 NK: so if not extremely low risk an onsite audit should take place yearly!</p> <p>"8.5.15.12.6 Extremely low-risk H/As shall comply with the following: c. Locally owned but not belong to a multi-site organization;"</p> <p>NK: not clear why this is relevant. There is no scientific base for the relation between locally owned and low risk. International chains usually have stricter management procedures and internal audits.</p>		
67	8.5.15.13	We see the ambition to be more specific. And we welcome the option to opt for hybrid audits. We appreciate Guidelines on remote audits but we cannot on those as they are not provided. We disagree that an TO audit needs justification for our standard of 1 day. Although the parameters provided help as guidelines we feel the approach of risk factors is incomplete in scope. If at all, then all risk categories should be specified to give an insight on how the parameters are escalated over the categories. These tight definitions for low-risk classify too many TOs as risky.	In response to the comments and requests, GSTC has developed the Guidance on Sampling for TO Certification. This guidance aims to provide clear and structured procedures to ensure that sampling practices are consistent with the standards, while	Newly revised- Annex C2 Requirements Specific to Tour Operator

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		And we are left uncertain whether more comprehensive schemes of risk assessment will be accredited. Nevertheless the favourable option for justification.	also addressing the specific needs and challenges encountered by tour operators.	
68	8.5.15.13	8.5.15.13.5. can you define small number of suppliers? C VERY CONFUSED!!! AGAIN PLEASE SIMPLIFY! NOTES: 99% of TO at the end of the evaluation are at high risk because everyone bring tourists to potentially sensitive areas because they are those at greatest interest for tourists. The risk assessment of TO should have criteria other than those of the hotel.		
69	8.5.15.13	The same comment on section 16. On the other hand we need to sampling details of tour operator offices and conducted tours.		
70	8.5.15.13	No comments.		
71	8.5.15.13	"8.5.15.13.1 On-site audits shall follow Clause 8.5.15.11. Surveillance audit shall occur annually. If a client is classified as a high-risk TO, the CB shall conduct an on-site surveillance audit." NK: so all developing countries, except few. All (outbound) operators who visit sensitive areas. "8.5.15.13.2 Audit duration shall be, at minimum, half a day (4 hours) for extremely low-risk, but more than two (2) days (16 hours) for high-risk situations. The CB shall provide justification whenever it assigns fewer than two (2) days." NK: So for developing countries not only once a year an onsite audit but also at least minimum two full days even for micro companies. "8.5.15.13.5 The CB shall justify the conditions in Clause 8.5.15.13.5." NK: not clear what is meant by this.		
72	8.5.15.14.1 8.5.15.14.2 8.5.15.14.3 8.5.15.14.4	"8.5.15.14.1 On-site audits shall follow Clause 8.5.15.11. Surveillance audits shall occur annually. If a client is classified as a high-risk TP, the CB shall conduct an on-site surveillance audit." NK: so for all developing countries, earlier it is stated in clause 8.1.15.12.5 that only in case of extremely low risk an onsite surveillance audit is not needed. "8.5.15.14.2 The duration of on-site audits is one (1) day, with a minimum duration of half a day (4 hours). The CB shall provide justification whenever it assigns less or longer duration." NK: is this per each tour product? How is this to be defined? Avia Tours in Cartagena has 100 tour products for Royal Caribbean for example, does that mean 50 audit days?, every year? Some products use the same suppliers and are only different in packaging and branding. Better to look at group of suppliers of a tour product. "8.5.15.14.3 c. If the TP is classified as high risk, the CB shall conduct an on-site audit." NK: not clear: only if extremely low risk = remote audit. High risk is always onsite audit. What about normal risk?	8.5.15.14.1 This applies specifically to the scope of TP, whereas the previous clause pertained to Hotels. 8.5.15.11 This clause applies to the scope of TP, covering a single product. 8.15.14.3.c Normal audits are already stipulated to follow the requirements outlined in 8.5.15.11. 8.5.15.14.4 This clause pertains to TP. Certification may be conducted by a third party, whereas verification could be handled by the TO sustainability team.	-

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		"8.5.15.14.4 b. All suppliers have been certified/verified sustainable by third parties;" NK: who would have to certify/ verify them? Guide? Transport companies? It is not existing in real world. "c. The tour duration is four (4) hours or less." NK: in all other cases onsite audit yearly?		
73		For clarity, ensure language is most precise as to how provisions apply—for example, in a provision such as 8.5.15.14.4., if all of the sub-sections are required to be considered "extremely low-risk," specify "all of the following." If fewer than all are required, or if CB discretion is being invited, provide for "one of" or "some of the following."	The suggestion has been accepted, and is reflected in the relevant clauses.	C.3.12 The TP complying with the following will be categorized as extremely low-risk:
74	8.5.16.2.	"8.5.16.2 The auditor may undertake interviews with stakeholders within or external to the client in order to clarify aspects of the client's activity and performance. The auditor shall undertake such interviews where there is significant doubt about the sufficiency, quality, or veracity of information supplied by a client." NK: even if no doubt, interviews with (internal) stakeholders (staff) should always be taken to check compliance. It is part of serious audit process.	The CB will be responsible for providing justification as required by the clause.	8.11.5. The auditor may undertake interviews with external stakeholders to the client in order to clarify aspects of the client's activity and performance. The auditor shall undertake such interviews where there is significant doubt about the sufficiency, quality, or veracity of information supplied by a client.
75	8.5.19.1.2. - 8.5.19.1.3.	"8.5.19.1.2 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" NK: it normal to grand certification conditionally, e.g. that non conformities are solved within the deadlines. If not, the risk of losing certification as of a minor NC is great. To avoid one needs to conduct the recertification audit 90 days in advance. However their still might be a period with open non conformities? Does it mean the Certification will be interrupted? Is this also valid for the resilience audit? "8.5.19.1.3 It has reviewed and accepted the client's planned correction and/or corrective action for any other nonconformities." NK: what is meant with "any other non-conformities"? Is a non-conformity not by definition against the reference standard?	8.5.19.1.2-accepted and verified C, CA 8.5.19.1.3-accepted planned of C, CA It is implemented CA vs planned CA	8.16.4.2. 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. Situations that raise significant doubt about the ability of the client's sustainability management processes to achieve its intended outputs; and 8.16.4.3. It has reviewed and accepted the client's planned correction and/or corrective action for any other nonconformities.
76	8.5.20.2.	"8.5.20.2 The CB shall have rules for certified clients that jointly advertise other tourism services that have not been certified by the Reference Standard. The advertisement of those other tourism services shall not imply that the product, process or service is certified by the Reference Standard." NK: what does that mean for a tour operator? Not all tours and products are certified.	This refers to the certification scope, which defines the specific areas or activities covered under the certification.	8.17.3. CBs shall have rules for certified businesses that jointly advertise other tourism services that have not been certified by the Reference Standard. The advertisement of those other tourism services shall not imply that the product, process or service is certified by the Reference Standard.
77	8.5.22.1. -8.5.22.3	"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 fulfillment of the Reference Standard requirements." NK: What are surveillance activities? What does it mean they "include periodic on-site audits"? Is this in addition to (re)certification audits? "8.5.22.2 Surveillance audits shall follow the requirements set out in Clause 8.5.15." NK: this clause states that they do not always have to include onsite audits. Contradictory to the article before.	8.5.22.1. Surveillance activities as outlined in ISO 17067 are required under ISO 17065. For clarification, we recommend consolidating sub-clauses within section 8.5.22 to streamline requirements 8.5.22.2. Surveillance audits may also be conducted remotely when appropriate.	8.18. Surveillance Activities

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		<p>"8.5.22.3 Surveillance audits shall be conducted once every year."</p> <p>NK: earlier it stated that they need to be conducted as follows: Y1: certification audit; Y2 resilience audit; Y3 resilience audit; Y4 (re)certification audit; etc. That is not once every year. "once every year" = each year? But not in year 1?</p> <p>"8.5.22.4 Surveillance audits shall be conducted on-site at least once every two years:"</p> <p>NK: does not fit with the above schedule.</p> <p>"8.5.22.4.1. For high risk situations, on-site audits shall occur annually."</p> <p>NK: here there is repetition of clause 8.5.15.</p>	<p>8.5.22.3. Annual surveillance audits are required. Please refer to the comment in 8.5.22.1.</p> <p>8.5.22.3 & 8.5.22.4. This approach allows for annual surveillance, with on-site audits required every two years; alternate years may utilize remote audits.</p> <p>8.5.22.4.1. For high-risk audits, annual surveillance shall be conducted on-site rather than remotely.</p>	
78	8.5.22.1. - 8.5.22.11	<p>"8.5.22.5.1 For remote audits, the CB shall only cover Section A, D1 and D3 in the GSTC Industry Criteria.</p> <p>NK: Why is that? Seems not to make sense. See earlier remark that in low risk situations onsite audits are only needed once per 9 (!) years.</p> <p>"8.5.22.5.2 For on-site audits, the CB shall ensure that social, cultural and environmental sensitive criteria in Section B, C and D3 of the GSTC Industry Criteria are covered."</p> <p>NK: an audit should cover all criteria. How to define "sensitive criteria", please be specific.</p> <p>"8.5.22.6 For extremely low risk clients, surveillance audits can be performed remotely. The CB shall cover all the GSTC Criteria and provide clear justification of the chosen methods for remote audit."</p> <p>NK: under 8.5.22.5.1 it is stated for remote audits "the CB shall only cover Section A, D1 and D3". This states something else.</p> <p>"8.5.22.7 The date of the first surveillance audit following initial certification shall not be more than 24 months from the last day of the audit."</p> <p>NK: the last day of which audit? Certification audit? Earlier a 3 year cycle is indicated. Y1: initial certification audit; Y2 surveillance audit; Y3 surveillance audit; Y4 re-certification audit. So Y2 surveillance audit is not required?</p> <p>"8.5.22.8 Surveillance audits are not necessarily full sustainability management processes audits. Surveillance audits may focus on key processes, a portion of the client's organization and/or sensitive issues. In the 3-year certification cycle, all requirements shall be covered.</p> <p>NK: so 3 year cycle. It just means that in Y2 and Y3 together all criteria should be covered in the two surveillance audits? Y1 and Y4 all criteria in certification audits? Good to make table as it gets very confusing.</p> <p>"8.5.22.9 Surveillance audits can use, to some extent, remote auditing techniques. In this case, IAF MD 4:2022 shall be used."</p> <p>NK: "to some extent"? So for the other part non remote (=onsite) techniques should</p>	The new clause has been revised	-

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		<p>be used. So all surveillance audits should have an onsite part. Contradicts what is written before.</p> <p>"8.5.22.11 The CB shall maintain certification based on the demonstration that the client continues to comply with the Reference Standard." NK: any non-conformity is not allowed and will imply losing the certification. Seems not realistic, minor non conformities will happen. See also earlier. There needs to be a term to solve them and if not complied with the term the certification can be terminated. That is normal in the certification world. This is too strict and leading to quick loss of certification with all consequences (e.g to adapt all promotion material, loss of reputation).</p>		
79	8.5.23.	<p>8.5.23 The CB shall comply with the requirements of ISO 17065:2012 Clause 8.0. NK: why not mention the clause here?</p>	The clause has been deleted	-
80	10 Auditor Qualification, Knowledge and Skills	<p>Auditor Qualifications. What is the rationale for doubling the number of audits from 10 to 20 that an auditor must have completed in the hospitality, tourism, environmental management, or social sector in the last three consecutive years? If the requirement of 20 audits in the hospitality, tourism, environmental management, or social sector is too stringent, consider an alternate approach of requiring more supervised audits as part of the training period.</p>	The clause has been deleted	-
81	10.7.1. -10.7.4.	<p>"10.7.1. Lead auditor qualification in any internationally recognized certification programs." NK: what is the definition of "internationally recognized"? Statement is unclear: is this about "work and audit experience" as the heading of 10.7 implies. Or a diploma / certificate based on a training / education programme?</p> <p>"10.7.2. At least 2 years experience in the hospitality tourism industry, environmental management, or social sector." NK: experience as what? Auditor or any experience?</p> <p>"10.7.3 Audit experience: at least 20 audits in the hospitality, tourism industry, environmental management or social sectors. Audits should be completed within the previous 3 consecutive years." NK: 20 audits in three years. We will lose all auditors. Our auditors are spread globally to avoid travel costs and climate damage. Our auditors have all worked in the tour operator sector. That is essential as deep understanding of role and responsibility and the supply chain is essential. We have bad experiences with auditors coming from the hotel sector, let alone auditors from environmental or social sector. You will not find auditors who have worked in the tour operator sector and done 20 audits in 3 years. We have alternative (online pre-assessment) approaches to ensure the quality of an audit.</p> <p>"10.7.4 An auditor shall undergo a supervised training period that involves at least 3 audits as a trainee auditor to gain practical experience in audit against GSTC Industry Criteria." NK: this will lead to high extra costs and flying around. Audits are thin spread. New auditor from Hawaii? Argentina? Bhutan? Mongolia? What to do with existing</p>	<p>10.7.1 The clause has been revised</p> <p>10.7.2. Any relevant experience is accepted, as this is not the sole requirement. Additional qualifications will also apply to ensure comprehensive competency.</p> <p>10.7.3 and 10.7.4.. The clause has been deleted.</p>	<p>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 experience in the hospitality tourism industry, environmental management, or social sector.</p>

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82	10.8.1. - 10.8.4.	<p>auditors?</p> <p>10.8.1. Training on auditing by training organizations relevant to non-tourism standards." NK: not clear sentence "The auditor shall have successfully completed training on audit techniques and practices provided by internationally and nationally recognized training organizations. GSTC accepts one of the formal training on such as ISO 9001 Quality Management Systems, ISO 14001 Environmental Management Systems, or other ISO standards or other relevant standards, provided by internationally and nationally recognized training organizations to fulfill this requirement; or" NK: Repeats clause above. What does "internationally recognized" mean</p> <p>10.8.2. Training on auditing by organizations relevant to tourism standards. The auditor shall have successfully completed training equivalent to other auditor training programs, as described in Clause 10.8.1, NK: "as described in Clause 10.8.1": not clear what is meant by this? with a minimum of the following areas, via online or offline:</p> <p>10.8.2.1 Quality and Environmental Management System relevant to ISO 9001 and 14001; NK: unclear formulation: what does "relevant to" mean?</p> <p>10.8.2.2 Audit techniques and practices based on ISO 19011; 10.8.2.4 Management of environmental, economic and socio-cultural issues applied to the tourism sector. NK: partly overlapping with Clause 10.8.1. These are many different trainings. Not realistic for smaller globally operating schemes. Will limit GSTC Accreditation to a few global players with no link to the travel and tourism sector.</p>	The clause has been revised	<p>10.8. Training on Auditing:</p> <p>10.8.1. The auditor shall complete the following via online or offline and CBs shall document the auditor qualification including the evidence of the training below:</p> <p>10.8.1.1. Audit techniques and practices based on ISO19011.</p> <p>10.8.1.2. Auditing to the Reference Standard(s) for GSTC Certification.</p>
83	10.9. - 10.9.3.2.	<p>10.9 The GSTC Training for Auditors. The auditor shall successfully complete the GSTC's Training for Auditors requirements. NK: so this in addition to all the trainings mentioned above.</p> <p>10.9.2 Auditors of TOs shall satisfy Module A, Module C, and Module E. Completion of these is sufficient for auditing TOs and Tour Products. NK: Good to be a bit more specific on what these "modules" are about. The website of GSTC indicates the following: To confirm auditors and certification decision-makers have the needed specific knowledge, they are required to attend an auditor training approved by the GSTC and satisfactory pass of an examination. Which are the "auditor trainings approved by the GSTC"? Or do you mean "GSTC auditor training provided by GSTC"? This requirement cannot be initiated until after the Certification Body has formally opened their application for accreditation. Unclear sentence: you can only follow the training after having applied for Accreditation?</p> <p>10.9.3.2 Completed at least 20 audits of Hotel/Accommodation/Tour Operator against a GSTC-Recognized Standard or the GSTC Criteria completed within the previous 3 consecutive years</p>	Clause 10.9 focuses exclusively on auditor training.	-

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		NK: The 20 audits is already a starting condition for any auditor. So if these happen over 3 years less training is needed.		
84	10.14.	10.14 Following up the GSTC Training for Auditors. Auditors shall take follow-up GSTC Training for Auditors organized by the GSTC when there is any change of the GSTC Criteria. NK: this is leading to additional costs. Information might also be communicated via online learning tools.	Online learning tools are accepted; however, this does not guarantee they will be provided free of charge.	-
85	10.15.	10.15 Records of auditors' competence. Up-to-date records shall be maintained at all times to demonstrate auditors' competence. The record of auditors newly qualified for sustainable tourism auditing shall be submitted to the GSTC Accreditation Secretariat for reviewing and managing the GSTC's list of qualified auditors. NK: what is happening with this list? Is it public? CB's might invest in their auditors and then they are promoted to other schemes by the GSTC?	This information is intended solely for GSTC internal knowledge and is not meant for public dissemination.	-
86	10.15.2.	Will this be at the cost of the GSTC? If the GSTC Criteria are revised, it is not the responsibility of the CB to front the costs of new examinations.	The Certification Body (CB) holds the responsibility for maintaining, improving, developing, and enhancing auditor qualifications. It is essential for the CB to ensure continuous professional development for auditors, enabling them to effectively meet industry standards and requirements, such as those outlined in the GSTC Auditor requirements. This includes regularly updating auditors' skills and knowledge to align with evolving certification criteria and best practices. The costs associated with keeping auditors' knowledge and qualifications current are the responsibility of the CB. Consequently, the cost of training related to revised criteria will not be included in the Manual revision.	-
87	10.6.1. - 10.6.2.	10.16.1 Periodical Evaluation. Auditors' competence shall be evaluated at least every three years through a combination of an observed on-site audit, shadow audits and feedback from different sources such as review of audit reports or client feedback. NK: additional costs and burden, especially in case auditors are not used frequently. 10.16.2 Revised GSTC Criteria Examination. Auditors shall pass an appropriate examination within six months of issue of revised GSTC Criteria or certification requirements. The type of examination (e.g., online, field performance, or both) shall be managed and communicated by the GSTC.	This clause is intended for the verification mechanism.	-

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		NK: This overlaps with 10.14, better to merge them or put them after each other.		
88	11.1.2.	Why do the reviewers need to know the GSTC Criteria and our own one if we only audit against our own certification requirements. In addition, how are the local, social, cultural and business contexts assessed?	It is important to note that 'The GSTC Criteria and Indicators and the GSTC-Recognized Standard used as Reference Standard' should be interpreted as a complete paragraph rather than in isolation. This section clearly references both the GSTC Criteria and Indicators, along with the GSTC-Recognized Standard. It is crucial for reviewers to understand that the recognized standard must also be aligned with the GSTC Criteria and Indicators. A comprehensive understanding of this alignment is essential for ensuring accurate and consistent evaluations	-
89	12.1.	If the organisation has taken remedial action then why is this relevant? What if there has been a change of management or ownership? This is not appropriate.	The suggestion is accepted and the clause has been revised in accordance with the suggestion. An organization is ineligible for certification if: 12.1.1. it has had its certificate withdrawn within the last 2 years and no remedial action has been taken; and 12.1.2. it has had its certificate suspended within the last 6 months without remedial action being implemented	12.1. An organization is ineligible for certification if: 12.1.1. it has had its certificate withdrawn within the last 2 years and no remedial action has been taken; and 12.1.2. it has had its certificate suspended within the last 6 months and no remedial action has been taken
90	12.1.2.	12.1.2 It has had its certificate suspended within the last 6 months. NK: so in case of suspension a minimum of 6 months gap will appear. What if the problem is solved within one month?	Suspensions are typically lifted once the issue has been resolved.	-
91	12.3.	12.3 If an entity belonging to, or currently contracted by, a client has been successfully prosecuted for violations of laws related to forced labor and/or environmental violations in the last 2 years, the organization applying for certification shall not be allowed to continue with the GSTC certification process. NK: not clear formulation. "GSTC certification process" = process towards certification. What if the companies is already certified? Does that mean the certification will be withdrawn? Tour operators are contracting thousands of suppliers. They can do a due diligence process, but there might be a small supplier who is prosecuted without them knowing it.	This clause specifically applies to the initial certification process, as indicated by the phrase "(organization applying for certification...)."	-
92	12.5.	12.5 The certification shall not be transferred when the client has any outstanding major nonconformities or is suspended, or the client is subject to an ongoing complaint that is under process by the current CB. NK: earlier it was stated that there cannot be a "certified" status with still	This may apply in cases of surveillance where an organization requests a transfer but has not yet closed all major non-conformities. In such cases, the organization still holds a valid certificate.	-

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		outstanding non-conformities (minor and major)		
93	12.4.	12.4 For the instance of a transfer to a new accredited CB (provision 12.2), consider ensuring that the CB from whom the client is transferring supply records and documentation pertaining to that client, to the new CB.	The suggestion has been accepted, and is reflected in the relevant clauses.	12.4. A CB may transfer a GSTC Certification to another GSTC-Accredited CB upon request from a client. Where a transfer has been requested, the CB accepting the transfer shall: 12.4.1. Record the reason(s) for the transfer and its legitimacy; 12.4.2. Verify and close any open minor nonconformities; 12.4.3. Determine whether an on-site or off-site audit is required to complete the transfer; 12.4.4. Inform the GSTC within five calendar days from the client's request to transfer; and 12.4.5. Apply the requirements of IAF MD 02: Transfer of Accredited Certification.
94	14.1.	<p>"14.1 CBs should note that Section 14 uses IAF MD 1:2018 as a basis with additional or specific GSTC requirements."</p> <p>NK: better formulation. "CB's should comply with IAF MD 1:2018 for multi-site certification". In addition the following GSTC specific requirements apply.</p> <p>"14.2 As in the general market, there are large enterprises in the tourism sector that operate and deliver tourism services at several different sites. When this happens in such a way that the tourism activities and their management are carried out in a similar manner at different sites, all under a single management system, the multi-site certification can apply."</p> <p>NK: this is a very vague formulation which might lead to a lot of confusion. Is a tour operator who offers packages in 100 countries, such as Evaneos, but works with local independent suppliers (legal entities) a multi site organisation? All suppliers have to comply to the rules of the Evaneos management system, for the products they deliver to Evaneos. Some Evaneos suppliers are large companies with 1000+ staff. Are they themselves part of the Evaneos "multi site organisation and certification"? Better to use ownership (legal entity) as definition. A multi-site organisation is a single legal entity with more sites (physical offices / buildings). It should not be about delivering the service but about production of the service legally under the to be certified legal entity. Third party suppliers should be excluded.</p> <p>"14.3 A multi-site organization is an organization with a central office in which certain activities are performed or managed within a network of sites, and at which such activities are fully or partially carried out. All sites have a direct legal or contractual link with the central office of the organization and are subject to a common sustainability management system (SMS)."</p> <p>NK: "network of sites"? That is a very vague (not legal) formulation. "legal link", very vague formulation, better to use "legal ownership", e.g. more than 50 %". "contractual link", very vague, it includes the bookkeeper, the accountant, and legal advisor, the telephone company, the internet provider, the cleaning company, etc. "with the central office", very vague: better to use "with the organization (= legal entity) under certification. What is a common SMS?"</p>	<p>14.1. The suggestion has been accepted, and is reflected in the relevant clauses.</p> <p>14.2. and 14.3. is the baseline for CB</p>	<p>14.1. CBs shall comply with the requirements of IAF MD 1:2023 when applying for multi-site certification.</p> <p>14.2. As in the general market, there are large enterprises in the tourism sector that operate and deliver tourism services at several different sites. When this happens in such a way that the tourism activities and their management are carried out in a similar manner at different sites, all under a single management system, the multi-site certification can apply.</p> <p>14.3. A multi-site organization is an organization with a central office in which certain activities are performed or managed within a network of sites, and at which such activities are fully or partially carried out. All sites have a direct legal or contractual link with the central office of the organization and are subject to a common sustainability management system (SMS). A multi-site organization is defined as an organization having:</p>

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		<p>14.3.2 A network of local offices or branches (sites) at which such activities are fully or partially carried out.</p> <p>NK: this is a more clear formulation. However the bottom line is legal entity or ownership in line with common branding. Certification is given to a legal entity and a commercial brand under that entity. There should be no public confusion regarding the certified brand, meaning that the products sold under that brand and within the scope of the certification should comply.</p>		
95	14.4.	<p>14.4 Such an organization need not be a unique legal entity, but all sites shall have a legal or contractual link with the central office of the organization and be subject to a common quality system which is established and subject to continuous surveillance by the central office. This means that the central office has the right to implement corrections or corrective actions when needed at any site. This shall be specified in the contract between the central office and the sites.</p> <p>NK: not "right to implement corrections", but "right to enforce corrections". Right to implement is always within one legal entity.</p> <p>Examples of possible multi-site organizations are:</p> <p>a. Organizations operating with franchises with common SMS, (for example, hotel management groups);</p> <p>NK: What if they have not a common SMS system? It should be about external branding. If sold under a common brand, than all the entities under the brand (within the scope of the certification) should comply in line with a multi-site organization.</p> <p>b. Tourism service companies with multiple sites offering a similar service; and</p> <p>NK: similar service? Very vague. Take "common brand" instead</p> <p>c. Tourism companies with multiple branches.</p> <p>NK; The question is what is going to obtain the certification. It is always a legal entity which selects one or more brands to be certified. If a brand is not selected the sites related to that not selected brand are not relevant for the scope of certification and are not part of the multi-site.</p>	A multi-site organization is defined as one with multiple locations operating under a single, unified management system. Therefore, having a common management system is essential.	-
96	14.6.	<p>14.6 All the relevant sites (including the central office) shall be under the multi-site organization's internal audit program and all shall have been assessed in line with that program before the organization applies to the certification.</p> <p>NK: what are "relevant" sites?</p>	"Relevant sites" refer to all sites included in the multi-site certification.	-
97	14.7.	<p>14.7 The tourism services provided by the multi-site organization shall be managed by the same organization.</p> <p>NK: "managed by the same organisation"? Vague. In a franchise system the services are not managed by a single organization (the franchise provider), but have to comply to a single set of common management rules. These are normally limited to certain aspects. The central organisation is not managing it franchise takers.</p>	In this case, the organization may not be eligible for multi-site certification under IAF MD 1 requirements.	-
98	14.8.	<p>14.8 The multi-site organization shall demonstrate that its central office has an established SMS in line with the Reference Standard under assessment and that the whole organization meets the requirements of the standard. This shall include consideration of relevant regulations.</p> <p>NK: it is also possible that a multi site organisation does not have a central SMS. If</p>	The definition of a multi-site organization is one that operates multiple sites under a single, unified management system, making a common management system essential.	-

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		they operate under a single brand than each single entity should be certified separately in order for each entity to get certified. If one would not comply all the other entities would lose their certification. With common internal SMS not all entities need to be audited separately and this is therefore cheaper. So a common internal system is advisable, but not essential.		
99	14.9.1.2.	14.9.1.2. Size of sites eligible for multi-site assessment: the larger the size of individual sites, the greater the inherent tendency for system implementation to vary from site to site; NK: why is that? Not logical, larger entities might have more documented procedures and control mechanisms consequently, the greater the need to have a higher sampling frequency. Similarly, extreme differences in the size or complexity of individual sites within the population increase the tendency for variations in the way in which the system is implemented. If significant variation exists in operational equipment or site size, such that it would be reasonable to expect some variations in consistency of operations, visits undertaken shall ensure sufficient sampling of each sub-category of site type. NK: it really depends on the quality of the management system and the level and deepness of its internal compliance systems.	The clause has been revised to enhance clarity.	14.9.1.The multi-site certification process shall not be applied where site sampling is not appropriate to gain sufficient confidence in the effectiveness of the management system under assessment. Such considerations shall include: 14.9.1.1. The scope of the SMS and if applicable sub-scopes for each site; and 14.9.1.2. Size of sites eligible for multi-site assessment.
100	14.11.2.	14.11.2 The sampling frequency shall be at least once every year. NK: "once every year", Better to use the word "annually". Sampling for what? Shall the audit take place every year? Is that different from a single site organisation? If so what is different? If not why to mention this here.	The clause has been revised to enhance clarity.	14.11.2. CBs shall ensure that the multi-site certification audit plan covers all sites over the course of the 3-year certification cycle.
101	14.12.2.	14.12.2 The CB shall monitor the multi-site organization's review and corrective action process and may need to increase the sampling frequency until it is clear that control is re-established. NK: "increase the sampling frequency"? Sampling for what? Probably it is meant to increase the audit frequency. So more audits per year? More audits will imply "more sampling". The objective is to audit and for that you need to do a sampling. 14.12.3.2 Exclude a particular site because of a major nonconformity at that site (in the case of surveillance). NK: not clear what is meant by this. So what should happen in case of major non conformity at one site during surveillance?	14.12.2. An increase in sampling means that CB may decide to audit additional sites. This does not imply an increase in audit frequency. 14.12.3.2. the clause of 14.12.3. is deleted	-
102	14.13.1.	14.13.1 The CB shall issue a single certificate identifying the name and address of the central office of the multi-site organization with a list of the sites to which the certificate relates. If the certification scope of any site(s) is only part of the general scope, this will be clearly shown in the schedule. NK: not clear what is meant by this? General scope? Is there also another scope?	If a single site performs only certain activities described in the certification, it is essential to clearly define the site's scope when describing it.	14.13.1. CBs shall issue a single certificate identifying the name and address of the central office of the multi-site organization with a list of the sites to which the certificate relates. If the certification scope of any site(s) is only part of the general scope, this will be clearly shown in the certificate.
103	14.13.4.	14.13.4 The certificate shall be suspended in its entirety if the central office or any of the site(s) does not/do not fulfill the necessary criteria for maintaining the certificate. NK: So any minor non-conformity noticed at any point in any of the sites will lead to suspension. Earlier it was stated that suspension will imply that the organisation will only be illegible to obtain the certificate back after minimum 6 months after suspension.	The clause has been revised to enhance clarity.	14.13.4. The certificate shall be suspended or withdrawn in its entirety if the central office or any of the site(s) does not/do not fulfill the necessary criteria for maintaining the certificate. Clause 8.19 shall apply for suspension or withdrawal.

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104	15.3.1.	<p>15.3.1. Group members shall be individual organizations that offer similar tourism services according the following categories:</p> <p>Hotels, Motels, B&Bs, Farmhouses, Campings, Alpine Huts, Scattered Hotels (Albergo Diffuso), Hostels offering at least stable rooms and breakfast service for guests</p> <p>Camping only offering tend camps and/or camper/caravan parking</p> <p>Resort and/or villages</p> <p>Apartments/Aparthotels, Holiday Homes, Residences and accommodations listed in point a without breakfast service</p> <p>Tour operators offering only daily excursions</p> <p>Tour operators offering multi-days packages (and daily excursions).</p> <p>The size of the group members should not exceed the one established for Small and Micro Enterprises according to the local legislation. (e.g. in Europe https://single-market-economy.ec.europa.eu/smes/sme-fundamentals/sme-definition_en)</p> <p>Rationale:the interpretation given is still too broad and can lead to the risk that different CBs would have different opinions leading to uncertainties for the Group Manager. In addition Group Certification is a tool useful for Small and Micro Enterprises who can't afford a Sustainable Management System, whilst it could be a burden for more structured enterprises.</p>	<p>Regrettably, the request cannot be accepted. The wording, 'Group members shall be individual organizations that offer similar tourism services,' clearly indicates that group members must provide similar tourism services. It is the responsibility of Certification Bodies (CB) to ensure that this requirement is communicated effectively and that there is a clear understanding of what constitutes similar services.</p> <p>Additionally, the clauses in Section 16, 17, and 18 provide a sampling classification that the CB can use as a reference when categorizing tourism businesses. We trust that this guidance will assist in ensuring compliance with the criteria.</p>	<p>15.3 When a certification scheme accepts the practice of group certification, the following shall be required:</p> <p>15.3.1. Group members shall be individual organizations that offer similar tourism services;</p>
105		<p>15.3.1 Group members shall be individual organizations that offer similar tourism services;</p> <p>NK: what is the definition of "similar"</p>	<p>"Similar" refers to organizations that fall within the same categories, such as accommodations or tour operators.</p>	-
106	15.3.6.	<p>15.3.6 A group manager shall be appointed who shall be responsible for the operation of the SMS. The group manager may be a cooperative of group members, an association, a consultant or an external auditing body;</p> <p>NK: but that cannot be the CB itself</p>	<p>The suggestion has been accepted, and is reflected in the relevant clauses.</p>	<p>15.3.6. A group manager shall be appointed who shall be responsible for the operation of the SMS. The group manager may be a cooperative of group members, an association, a consultant or an external auditing body, but shall not be the CB itself;</p>
107	15.6.	<p>15.6. The CB shall clearly communicate the certification requirements for group certification, including these requirements and any additional scheme-specific requirements (regardless if these are set by the CB or the standard owner) to the group manager. Any update and new interpretation must be communicated to the Group Manager in a timely manner. GSTC shall grant at least one year for its integration in the SMS.</p> <p>Rationale: despite the improvement, it is important to state that the GM has at least one year (between the two external audits) to implement the new requirements. Otherwise there could be the risk of sanctions and NCs for requirements that have been communicated since a short time.</p>	<p>Regrettably, the request cannot be accepted, the GSTC does not intervene in or oversee the relationship between Certification Bodies (CB) and their clients. This Accreditation Manual is intended for the CBs to adhere to, and the responsibility for managing client relationships and ensuring compliance rests with the CB.</p> <p>Furthermore, regarding the rationale for input, each CB has its own</p>	<p>15.6. CBs shall clearly communicate the certification requirements and any relevant revisions, including timelines for integration, for group certification, including these requirements and any additional scheme-specific requirements (regardless if these are set by the CB or the standard owner) to the group manager.</p>

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			management system to address these matters. It is the CB's responsibility to ensure that their internal procedures and management systems effectively meet these requirements.	
108	15.10.	<p>15.10 The CB shall audit the SMS to the same Reference Standard at least once every year.</p> <p>NK: use the term "annually". What does "auditing the SMS" mean? The system or the compliance to the criteria? Is this a certification audit ? Resilience audit? What is different from the logic for a single entity organisation?</p>	There is no difference; the same logic applies to single-entity auditing. This means that the headquarters (HQ) and the single management system (SMS) are audited annually, while sampling is only applied to group members. No sampling is used to audit the SMS. Additionally, the comment has been accepted, and the clause has been revised to enhance clarity.	15.10. CBs shall audit the SMS to the same Reference Standard at least annually while the group members are audited according to the sampling described in Clause 15.15 of this manual.
109	15.11.4.	<p>15.11.4 Each member of the group shall be internally inspected annually;</p> <p>NK: what does internally inspected mean? Onsite audit / inspection? Document audit?</p>	"Internal inspection" means that the group can decide on the method for auditing its members, and the certification body (CB) will incorporate the results of the group's internal audit into the overall auditing process. Additionally, the clause has been revised to enhance clarity.	15.11.4. The frequency of the internal audit shall be justified and include all group members; and
110	15.11.5.	<p>15.11.5. New group members are only accepted as certified after the record-keeping requirements are fulfilled, the internal inspection is completed and there are no nonconformities outstanding. The Group Manager may add new Members to the certificate scope at any time within the annual growth limit approved by its certification body.</p> <p>NOTE: At each evaluation, the certification body will evaluate the ability of the Group Manager to manage the number of members in the certificate and approve an annual growth rate up to a limit of 100% based on the number of Participating Sites at the time of the evaluation. Where a certificate has 20 (twenty) or fewer members at the time of the main evaluation, the certification body may approve a growth rate higher than 100%, based on the demonstrated capacity of the Group Manager to manage a higher number of members.</p> <p>If the number of Participating Sites is going to exceed the approved growth limit, new sites can only be added to the certificate after the Certification Body has done an audit of the Central Office and a sample of the new members. The CB is not required to visit all new members before including them in the certificate.</p> <p>NOTE: In the audit for inclusion of new members, the certification body will establish a new growth limit for the period between the date of the expansion of scope audit and the next certification body's surveillance audit.</p> <p>Rationale: Group Certification has Economies of Scale only if there is a sampling of members by the CB. However some kind of limitations should be implemented in order to avoid an unmanageable increase in audit risks. The proposed compromise derives from FSC FSC-STD-40-003 standard.</p>	<p>Regrettably, the request cannot be accepted, since the GSTC does not intervene in or oversee the relationship between Certification Bodies (CB) and their clients. This Accreditation Manual is intended for the CBs to adhere to, and the responsibility for managing client relationships and ensuring compliance rests with the CB.</p> <p>Furthermore, regarding the rationale for input, each CB has its own management system to address these matters. It is the CB's responsibility to ensure that their internal procedures and management systems effectively meet these requirements.</p>	<p>15.11.5. To include a new group member in the Group Certificate, the CB shall evaluate the new member either by including in the sample audited during normal audit or by conducting an extra audit and confirm the following:</p> <p>15.11.5.1. Record keeping requirements are fulfilled;</p> <p>15.11.5.2. An internal audit is conducted and the records are maintained;</p> <p>15.11.5.3. All nonconformities are closed; and</p> <p>15.11.5.4. Instances of nonconformity are dealt with by the group manager.</p>

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
111	15.13.	<p>15.13. The CB shall assess the competence of the group's internal auditors, according to ISO 19011:2018 and reference GSTC Criteria. The assessment shall take the form of an interview, records of internal training or of a training certificate of completion provided by internationally and nationally recognized training organizations.</p> <p>Rationale: the internal auditor is not a CB, therefore its knowledge can be limited with respect to the one of the CB.</p>	<p>The suggestion is accepted and the clause has been revised in accordance with the suggestion.</p> <p>15.13. The CB shall assess the competence of the group's internal auditors, according to ISO 19011:2018 and GSTC Criteria.</p>	15.13. CBs shall assess the competence of the group's internal auditor(s), according to ISO 19011:2018 and GSTC Criteria.
112	15.14	<p>15.14. The CB shall audit a sample of group members to evaluate the effectiveness of the SMS. The sample size shall be based on the results of the risk assessment. The minimum number of group members to be audited annually by the CB shall be the square root of the total number of members in the group. The total number of members audited (Y) shall be based on the following formula for main evaluations, surveillance evaluations and re-evaluations:</p> <p>$Y = R \sqrt{X}$, where:</p> <p>Y = Number of Sites Members to be audited by the certification body (rounded to the rounded to the next integer)</p> <p>X = Total number of Sites Members</p> <p>R = Risk Index = sum of points assigned to the group certification, based on risk assessment of the CB based on the following:</p> <p>The risk index shall be minimum 1 and maximum 1.5. Risk factors that must be accounted are: Certificate size</p> <ul style="list-style-type: none"> • Group Manager's Performance • Site types (urban,natural,protected area) of Members • CPI of the members' countries • Site sizes <p>The members to be audited shall be selected in a way that represents the whole group, based on a combination of a risk-based and random selection of the sample.</p> <p>Rationale: the number of group members to be audited annually is a fundamental part of the supplier selection, therefore they should be publicly available and easy to access. There should be a clear and precise definition of the risk factor (R) that the CBs have to apply and not leave the decision to the CB itself. Otherwise CB selection could be based on the "easiness" of the process. In the determination of the maximum risk factor FSC-STD-20-011 (pg.26) has been applied. We also suggest integrating a similar table in the Accreditation Manual.</p>	<p>The new clause has been established in response to the suggestion.</p>	<p>15.15. Sampling for group certification</p> <p>15.15.1. The sample size shall be based on the results of the risk assessment. The minimum number of group members to be audited annually by the CB shall be the square root of the total number of members in the group.</p> <p>15.15.2. The members to be audited shall be selected in a way that represents the whole group, based on a combination of a risk-based and random selection of the sample.</p> <p>15.15.3. CBs shall ensure that the group certification audit plan covers all group members over the course of the 3-year certification cycle.</p>
113	15.17.	<p>The clause has been deleted, does it mean that the only "sanctions" applicable by the CB are suspension and withdrawal of the certificate? If yes ok, if not what is the reference clause? There should be a clear and precise definition of the sanctions that the CBs have to apply and not leave the decision to the CB itself. Otherwise CB selection could be based on the "easiness" of the process.</p>	<p>The sanction part from the Section 15 has been removed in this revision. Generally, sanctions will apply for this matter. The Clause 8.5.12.4. will apply.</p>	-
114	15.18.	<p>The clause has been deleted, does it mean that the only "sanctions" applicable by</p>		

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		the CB are suspension and withdrawal of the certificate? If yes ok, if not what is the reference clause? There should be a clear and precise definition of the sanctions that the CBs have to apply and not leave the decision to the CB itself. Otherwise CB selection could be based on the "easiness" of the process.		
115	15.19.	The clause has been deleted, but somewhat integrated in the new 15.18		
116		15.19 Major nonconformities, when the SMS is not functioning or when there is a direct risk that services are not meeting the standards or that non-certified services are sold as certified, shall lead to suspension of the entire group's certification. NK: meaning 6 months gap minimum in certification, High consequences. It makes sense to provide a 30-90 days term to solve major non conformities (of course in case of serious neglect and dysfunction of the SMS also stronger action can be taken, but not by default suspension for the whole group in case a major at one the members).		
117	15.20.	15.20 The CB shall follow up on sanctions in a timely manner to determine if conditions have been fulfilled and shall render further sanctions where necessary. NK: what is "a sanction" other than suspension of certification?		
118	15.23.	15.23. The certificate shall be [withdrawn] suspended in its entirety if five or more major corrective action requests are issued to the central office of a group by the certification body. Five or more major corrective action requests issued to a participating site of a group by the certification body shall result in suspension of that particular participating site but will not necessarily result in the suspension of the entire certificate. Non conformities identified at the participating-site level may result in non conformities at the Group Manager level when the nonconformities are determined to be the result of the central office's performance. Rationale: suspension is considered a sufficient measure to avoid misleading communication to potential consumers. Withdrawal should be a "last resort" measure only if NCs related to the suspension are not closed in a timely manner. In addition in the current version there is no difference between major and minor non conformities. The proposed suggestions comes from FSC-STD-20-011 standard (page 16).		
119		15.23 Consider streamlining the administrative requirements for group certification and removing or adjusting provision 15.23, which unfairly sanctions the entire group rather than a single group member who fails to fulfill necessary criteria for maintaining the certificate.		
120	16.1.	16.1 The term "Tour Operator" is the business/organization that plans, operates and delivers a complete package tour to a traveller. The term Tour Operator involves a large diversity of types of packages, transport operators and sellers of travel that can be combined amongst them and vary according to the set of product/service offerings, ownership structure and/or geographical location of their operations. For the purpose of certification, Tour Operators comprise outbound Tour Operator, inbound Tour Operator and Land Transport Suppliers and any combination of the 3 categories.	Complete package tour: comprehensive travel package that includes all essential elements—such as transportation, accommodation, and potentially other activities—planned and operated by the tour operator.	-

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		NK: what is a “complete” package tour versus an “incomplete” package tour? NK: “sellers of travel” = Travel agency NK: 3 conflicting definitions are given. So travel agencies are excluded from certification?		
121		16.3 The TO shall register legally as a TO providing inbound, outbound or domestic tour services to be eligible for TO Certification. NK: this depends on the jurisdiction. In some countries you might not be able to legally register as a tour operator specifically. You might also operate in and outbound services in one legal entity.	CB may provide justification on this	-
122		16.4.1.1 Outbound Tour Operator: Businesses that operate outbound tourism comprising for a visitor who resides outside the country of reference, either as part of an outbound tourism trip or as part of a domestic tourism trip. NK: a visitor who resides outside of the country of reference is by definition not be part of domestic tourism	The comment is acknowledged; however, we will maintain our existing approach, as our current definition comprehensively covers the outbound TO.	-
123	Section 16.	When is this supposed to happen? If this is done during the certification/audit process, it should be a GSTC Criteria, not an accreditation criteria. If it is done during the audit, do our existing requirements comply? How is this even possible? Communicating the GSTC Hotel Criteria serves no purpose, and sending our own is not beneficial either. The third-party company has no need to understand our own, or the GSTC Requirements. Promoting sustainability is better achieved through making the hotel’s sustainability policies and reports available (already a requirement). This whole section is not workable for us – perhaps if GSTC explained the purpose we might be able to make sense of it and consider ways to accommodate.	The Certification Body (CB) is expected to understand that the certification process encompasses not only the business operations but also the broader operational practices, including contracting, encouraging, and engaging with suppliers. As such, due diligence is essential to ensure alignment and progress toward a shared vision of sustainability. Therefore, the CB should ensure that the business effectively manages these aspects in accordance with the criteria.	Newly revised- Annex C2 Requirements Specific to Tour Operator
124	16.4.1.4.	16.4.1.4 Destination Management Companies (DMCs): They may also be called Ground Handlers and other similar descriptions. Businesses arrange and operate tours for incoming tourists on behalf of overseas TOs. NK: there are so many hybrid forms that it does not make much sense to distinguish them. Definitions also very per country / language, etc. Specific definitions are only relevant if the entities are treated differently.	CB may provide justification on this	-
125	16.4.2.1. - 16.4.2.3.	16.4.2.1 A wholesale tour operator is a travel professional that creates travel packages to be sold to travellers directly or through travel agencies at a discount. NK: “wholesale tour operator”? NK: “a professional” is a natural person and a tour operator is a legal entity, a legal entity cannot be a natural person at the same time, unless it is a one person company. NK: “At a discount”? That is not by definition. Pricing can be dynamic and depends on the markets and distribution channels, etc. etc. 16.4.2.2 As a seller of their services on a retail basis. NK: so this is a travel agent. Does not have a place under 16.4.1 (type of tour operator)	We have acknowledged the comment; The comment will be stored for specific revision for Tour Operator.	-
126	16.5.	16.5 The CB shall evaluate how the TO selects and prioritizes suppliers. This evaluation shall be completed before the onsite assessment. Auditing sample tours should verify this evaluation. The sampling process shall identify tours with the	Sampling for tours in Tour Operator certification aims to verify how the Tour Operator selects, manages, and ensures	-

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		<p>highest volume and those in higher risk categories.</p> <p>NK: how to audit a sample tour? Shall it be done onsite? It does not make sense to speak about a “tour”. A tour is a product, the packaging of a set of services provided internally or with the support of external suppliers. Sampling of a tour is relevant for product certification. A tour operator is basically a set of service (product element) / supplier (legal entities) combinations. They should be subject to the audit. For example a tour operator would work with 100 accommodations; 30 guides; 4 transport companies; and 10 activity providers. For an audit the service / supplier combinations should be sampled based on risks and relevance (e.g. turnover, number of pax). How they are packed and sold in tours is not relevant. Nowadays with more and more dynamic packaging their might thousands of different tours. One supplier/service can be part of many different tours. So it is not about the tours, but what is inside of them (the elements).</p>	<p>the quality and compliance of suppliers involved in their operations.</p>	
127	16.6.	<p>16.6 In cases where a TO manages more than one of the categories described in 16.4, the CB shall determine whether the scope of certification should include all the categories or whether each TO category should apply for separate certifications.</p> <p>NK: It does really not make any sense to distinguish between different categories of travel companies, it is all very fluid in practice. If different forms operate under a single brand than all should comply to avoid misleading statements.</p> <p>16.6.1 If all TO categories are subject to a common SMS, then all the categories shall be considered in the scope of certification.</p> <p>NK: Why is that?</p> <p>It is not about a common SMS but about common branding to the market. A single legal entity could have a brand Greentour or outbound tourism and Fairtour for domestic tourism. They have one single SMS. They can however decide that they only want to certify “Greentour”. That means that the head office and the supply chain of Greentour is within the scope of audit/certification. It can decide that Fairtour is not considered. This happens a lot. For example in the Arabic Emirates there are many very large outbound operators who also do some shore excursion for cruise lines under a separate brand however all under one management system. They can decide to only have the shore excursion brand to be certified.</p>	<p>CB may provide justification on this</p>	-
128	16.7.	<p>16.7 The TO shall conduct due diligence on its suppliers and subcontractors regarding their compliance with the GSTC Industry Criteria.</p> <p>ChatGPT: Due diligence in relation to sustainability auditing involves a systematic and comprehensive assessment of an organization's environmental, social, and governance (ESG) practices, impacts, and performance.</p> <p>NK: so here clearly is stated that all suppliers have to comply with the full GSTC Industry Criteria. So all suppliers even if contracted only one time a year and also micro companies such as taxi drivers should fully comply to the GSTC industry criteria and these should be systematically and comprehensively assessed by the TO. Outbound TO might have thousands of suppliers which all are expected to comply to all GSTC Industry criteria. This is just not feasible, with the exception of only small locally based tour operators with very limited number of suppliers. It is basically a multi-site certification of the tour operator and all its suppliers. Take a</p>	<p>The clause has been revised to enhance clarity.</p>	<p>C2.8. The TO shall conduct due diligence on its suppliers and subcontractors regarding their compliance with the Reference Standard. The minimum activities for the TO to fulfil this requirement shall be recorded and shall include:</p> <p>C2.8.1. Communicating the Reference Standard to the suppliers and subcontractors; and</p> <p>C2.8.2. Monitoring the sustainability performance of suppliers and subcontractors.</p>

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		<p>small inbound tour operator who hires a car for one day from the Avis car rental company. Then that TO should ensure that Avis, as a multinational company, complies with the GSTC standard? NK: Also suppliers of internet services? Utility companies?</p> <p>16.7.1 Communicating the GSTC Industry Criteria to the suppliers and subcontractors; NK: all of the suppliers and subcontractors? Even if hired once a year?</p> <p>16.7.2 Performing assessments of the suppliers and subcontractors' compliance using a checklist for ensuring their sustainability performance. The checklist used by the TO shall ensure it measures sustainability performance of the suppliers and subcontractors; and NK: So all of the GSTC criteria and indicators in line with 16.7.</p>		
129		Does this contradict Section 8?	The Audit Duration is not described in the Section 8.	-
130	16.8.	<p>16.8 In cases where the TO owns majority equity in a supplier or is under common ownership with that business, and supplier's products and services are promoted or used frequently by the TO, the TO shall be required to arrange for that business to be either (i) included within the scope of certification, or (ii) certified under a separate and distinct certification. A five-year timeline for inclusion or completion of certification shall be set by the CB (8.5.7.1.1). NK: Why is that? A legal entity having a shore excursion provider brand with only 6 staff members might own a big hotel chain under a different brand. It might promote these hotels. Why these hotels need to be certified as well if they operate under a different brand and no consumer confusion can emerge? These hotels should be considered as (internal) suppliers as they are not part of the scope / brand combination under certification. Or image TUI as a tour operator. TUI also owns more hotel group under different brands (TUI Blue, TUI Magic Life, TUI Sensatori: TUI Sensimar; Robinson Club). Do these hotels than also have to become certified?</p>	The reference clause has been revised with "... strongly recommended"	8.7.1.1. In cases where the client owns majority equity in a supplier or is under common ownership with that business and that supplier's products and services are promoted or used frequently by the client, it is strongly recommended that the client arrange for that business to be either; a. included within the scope of certification; or b. certified under a separate and distinct certification.
131	Evaluating the Hotel/Accommodation Management System 16.9.	Does this not belong in the industry criteria? Evaluating the functioning and effectiveness of the SMS in a hotel would be part of the criteria.	The clause has been removed in accordance with the suggestion.	-
132	16.15.	<p>16.15 Supplier Sustainability Practices. Draft 4.0 of the Accreditation Manual still raises questions about whether and how the tour operator's certification audit involves any direct auditing of suppliers outside the scope of the audit of sample tours. If the CB is expected to complete any auditing of suppliers within the process of auditing the sample tours, this would be helpful to clarify in the Manual (for example, in provision 16.15.)—to dispel any expectation that auditing of suppliers is expected separate and apart from the audits of sample tours. Additionally, provision 16.15.3. implies that suppliers should be audited against the full set of GSTC Industry Criteria. Is this GSTC's intention? These provisions regarding audits of suppliers could be inordinately onerous if not streamlined and clarified.</p>	We have provided audit guidance and will revise the clause wording to prevent any potential confusion.	C2.8. The TO shall conduct due diligence on its suppliers and subcontractors regarding their compliance with the Reference Standard. The minimum activities for the TO to fulfil this requirement shall be recorded and shall include: C2.8.1. Communicating the Reference Standard to the suppliers and subcontractors; and C2.8.2. Monitoring the sustainability performance of suppliers and subcontractors.

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
133	16.11.2.	<p>16.11.2 Excursions; Single-day tour packages without any overnight accommodation. These include city tours, local tours, regional tours, or shore excursions from cruises while in port.</p> <p>NK: Why the type of product (packaging of suppliers) is relevant? It is a management certification and not a product certification (which is under the section "tour" certification). As Travelife we follow the methods as developed by TOI/UNEP around the year 2002. The tour operator obtains a certification, so all the activities which are in the scope / brand should be part of it. That's including all contracted suppliers, it is irrelevant how they are packed and distributed.</p>	<p>Specifying product types is relevant because, while the management system may be the same, excursions and multi-day tours involve different classifications and operational needs. Excursions, for example, have distinct requirements compared to multi-day tours with more complex logistics. Ensuring each product type meets specific standards strengthens the certification's reliability and confirms that the management system effectively adapts to various offerings.</p>	
134	16.12.3. 16.13.	<p>16.12.3 Size of business based on number of suppliers.</p> <p>NK: Sampling for what? For auditing I assume. What will you sample? How is the number of sites (destinations?) the tour operators operates in related to the sample process? The square route of the number of sites?</p> <p>How is a site defined? By definition a tour (operator) is involved in many "sites". Sites: space of ground occupied or to be occupied by a building. 2 : the place, scene, or point of an occurrence or event, e.g a picnic site.</p> <p>Does one need to follow: IAF MD1:2018 (see 16.13)</p> <p>16.13 The CB shall provide sampling procedures for the TOs. In case the TO has more than one unit, the sampling process needs to include them inside the scope of certification. The procedure shall meet IAF MD1:2018 Requirements. NK: Unit? What is meant by this? Office? Business unit?</p> <p>16.13 The CB shall provide sampling procedures for the TOs. In case the TO has more than one unit, the sampling process needs to include them inside the scope of certification. The procedure shall meet IAF MD1:2018 Requirements. NK2: You probably mean "scope of audit" instead of "scope of certification"</p> <p>NK: IAF MD1:2018 = auditing multisite certification. So the tour operator and its supplier are seen as a multisite certification. The minimum number of sites to be visited per audit is:</p> <ul style="list-style-type: none"> • Initial audit: the size of the sample shall be the square root of the number of sites • Surveillance audit: the size of the annual sample shall be the square root of the number of sites with 0.6 as a coefficient ($y=0.6 \sqrt{x}$), • Re-certification audit: the size of the sample shall be minimum, $y=0.8 \sqrt{x}$ <p>NK: certification for outbound tour operators working in multiple destinations will be extremely expensive. For example SNP Nature travel (Netherlands) works in 50 countries with 10.000 accommodations. So 100 (!) accommodations have to be visited and audited based on the GSTC standard.</p>	<p>16.23.2. GSTC has established the "Guidance on Sampling of Tours for the GSTC Tour Operator Certification"</p> <p>16.13. GSTC has established the interpretation document for "unit" interpretation. Kindly refer to the interpretation document.</p> <p>16.13. CB may provide the justification and follow the IAFMD1:2018 for sampling the unit.</p>	-
135	16.18.	<p>16.18 Suppliers that are being sampled for the purpose of auditing may be audited remotely if these are considered low risk by the CB.</p>	<p>CB may provide justification on this</p>	

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		NK: All suppliers from developing countries are not low risk, so they need to be audited onsite.		
136	16.20.	16.20 The CB shall audit the TO Management System in order to evaluate its functioning and effectiveness and to ascertain whether the SMS results in conformity with the Reference Standard and certification requirements. NK: that implies that all suppliers have to be registered and information from all suppliers needs to be gathered on all GSTC criteria / indicators.	The clause has been revised to enhance clarity.	C2.15. CBs shall include in the audit process the review of the TO management system from the head office and relevant local offices, of performance records relating to the requirements of the management system and suppliers contracts.
137	16.22.5.	16.22.5 All supplier contracts include clauses requiring sustainable practices to be implemented and reported to the TO. NK: as earlier indicated, this should refer to full GSTC Industry standard to be complied with.	The clause has been deleted	-
138	17.4.	17.4 When certifying a Tour Product the CB shall specifically evaluate the following GSTC Industry Criteria at each audit, and shall obtain evidence of conformity with each criterion that is directly attributable to the Tour Product to be certified (Product-Specific Evidence). The CB shall evaluate and record Product-Specific Evidence for each of the following GSTC Industry Criteria: A5 Customer experience; A6 Accurate promotion; A7.4 Access for all; A9 Information and interpretation; B2 Local employment; B3 Local purchasing; B4 Local entrepreneurs; B5 Exploitation and harassment; B7 Decent work; B8 Community services; B9 Local livelihoods; C1 Cultural interactions; C3 Presenting culture and heritage; C4 Artefacts; D1.1 Environmentally preferable purchasing; D2.2 Transport; D2.4 Solid waste; D3.3 Visits to natural sites; D3.4 Wildlife interactions; D3.5 Animal welfare; and D3.6 Wildlife harvesting and trade. NK: this list is less exhaustive than the full GSTC list which is required for each tour operator supplier for the TO management certification. This does not make any sense. Not clear why some material criteria are excluded / not obligatory. In case of product certification the product should comply to all relevant (material) GSTC criteria in line with consumer expectations.	TP Certification can only be conducted by a certified TO, as the management system is already addressed by the TO Certification. TP Certification may therefore focus on the implementation of the TO's SMS and the specific product, rather than covering all criteria	
139	17.7.	17.7 The TO is not eligible to conduct a certification process while its certificate is suspended. NK: not clear clause. What is a "Certification process"?	The TP certification process can only be conducted by a Certified TO. Consequently, if the TO's certification is suspended, they will be unable to certify their products or proceed with TP	-

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
			certification.	
140	17.9.1.	17.9.1. "Excursion" is defined as a day-trip of any number of hours, without overnight accommodation, and consisting of one or more of the following: attractions, guide services, transport vehicles, food and beverage. NK: "Activities" is missing: cycling, fishing, whale watching, diving, boot tour, cooking, etc.	CB may provide justification on this	-
141	17.10.1.	17.10.1 An excursion shall be certified only if it is operated by a TO that is certified by an Accredited Certification Body, as set out in this Accreditation Manual; NK: what does "operated" mean? Can it include external suppliers who operate elements?	Operated' refers to being managed by the Certified TO. Excrision may include services provided by external suppliers.	-
142	17.10.5.	17.10.5 Customized Excursion packages shall not be certified. NK: If they are comprised out of audited suppliers / services who all comply to the standards they could be certified. It is about supplied services and not about how they are packed.	CB may provide justification on this	
143	17.11.3.1.1.	17.11.3.1.1 High risk attractions located in the areas having high natural and/or cultural conservation value or high risk activities with wildlife or sensitive cultural site visits like marine mammal parks/shows and indigenous communities shall have documentation to explicitly demonstrate compliance with each criterion and each aspect of the indicators applicable to that criterion (See the Clause of 8.5.12.6 and 8.5.12.12); and NK: Attractions is not the same as activities	We have acknowledged the comment;	-
144	18.2.5.	18.2.5. Clarify in provision 18.2.5. that GSTC logo usage alongside a tour product can be permitted by a valid licensing agreement with GSTC. Clarifying language in that provision could read, for example: The GSTC logo shall not be presented with or alongside any tour products unless (1) those tour products are currently GSTC Certified according to the requirements in Section 17, or (2) the tour operator is certified by a GSTC accredited program and has signed a licensing agreement with GSTC permitting use of the GSTC logo at the tour level along with appropriate qualifying language to clarify meaning of the logo use.	The suggestion has been accepted, and is reflected in the relevant clauses.	16.2.5. The GSTC Logo Usage relating to the GSTC Tour Product Certification shall comply with the terms of the CBLA with the GSTC. 16.3. Certification Body Licensing Agreement Authorization Timeframe 16.3.1. The CBLA will be shared with the CB following the Assurance Panel's Accreditation Decision. 16.3.2. Upon signing of the CBLA by both parties, the Accreditation Certificate shall be issued and delivered to the CB.
145		RCG also recommends providing clarification of the logo usage as just being dictated as Licensing Agreements state. Not allowing logo usage for Tour Operators would dissuade Tour Operators from getting certified. The language in 18.2.5 would read as follows: 18.2.5. The GSTC Logo Usage shall comply with the terms of the CBLA (Certification Body Licensing Agreement) with the GSTC.	The suggestion has been accepted, and is reflected in the relevant clauses.	16.2.5. The GSTC Logo Usage relating to the GSTC Tour Product Certification shall comply with the terms of the CBLA with the GSTC. 16.3. Certification Body Licensing Agreement Authorization Timeframe 16.3.1. The CBLA will be shared with the CB following the Assurance Panel's Accreditation Decision. 16.3.2. Upon signing of the CBLA by both parties, the Accreditation Certificate shall be issued and delivered to the CB.
146	19.1.	Where is this licensing agreement?	The suggestion has been accepted, and is reflected in the relevant clauses.	19.3. CBLA Authorization Timeframe 19.3.1. The CBLA will be shared with the CB following the Assurance Panel's Accreditation Decision.
147	Annex A	Annex A: CS-CB Framework. Regarding the language: "CS agrees to no longer manage/provide auditing and certification services." Does participation in the CS-CB Framework prevent the CS from continuing any type of verification or other	The wording of "...certification service" comprehensively covers all service details; therefore, we will retain the	-

No.	Section/Clause from previous drafts	Comment Received	GSTC Analysis	Result
		<p>support services short of certification (e.g., training, assistance with self-assessments, verification audits as differentiated from certification audits, etc.)?</p> <p>If it does not prevent them, we recommend specifying which activities are allowed and any related guidelines. For example if true: “CS agrees to no longer manage/provide auditing and certification services, however can continue the following types of services short of certification: [SPECIFY HERE], granted that they do not refer to services as certification, make sustainability claims, or apply other inaccurate labels.”</p> <p>If it does prevent them, we recommend including very clear language to specify, such as, “CS agrees to no longer manage/provide auditing and certification services, including any type of verification [or SPECIFY IF ANY ADDITIONAL DETAIL IS APPROPRIATE ABOUT PRECLUDED ACTIVITIES] short of certification .”</p>	original phrasing.	
148		GSTC Logo Use Promoting Certified Clients. Could GSTC include a reference in the Accreditation Manual acknowledging that, if additional entities wish to use GSTC’s logo to promote certified clients (e.g., customers of certified hotels or tour operators—for example a travel agent or GDS—selling those products on their websites), those entities must enter into a licensing agreement with GSTC. This way, the accredited CBs can know to tell their clients (and in turn clients can tell their customers) that information.	The comment is acknowledged; however, we will maintain our existing approach, as our current LA comprehensively covers the requirements, and we do not see a need for an additional type of LA.	-
149	Annex C	C.7.4. Internal inspectors can provide advice to group members but shall not inspect those members to whom they have provided advice, they should be independent of management and shall not audit/inspect their own work; NOTE: Training activities provided by the Group Manager do not constitute conflict of interest	The suggestion has been accepted, and is reflected in the relevant clauses.	B7.4. Internal auditors may provide advice to group members but they shall not audit those members to whom they have provided advice. Auditors shall remain independent of management and shall not audit their own work. Note: General training activities provided for awareness do not constitute conflict of interest.
150	General Comment	GSTC Publishing Information about Assessment Results and Certified Clients. Per ISEAL Assurance Code, where is the following information publicly available, or when will it be publicly available? (1) Current list of certified clients, their scope of assurance, and expiry date of their certificate (where expiry dates are used), and (2) Basic information about the results of assessments of both clients and assurance providers.	AM will continue to align with ISO 17065 requirements while addressing the evolving needs for ISO 17011 and ISEAL compliance. Per ISEAL Code 6.1.1, information for certified clients is to be available at the assurance provider level, not necessarily public. The same approach applies to withdrawn certificates, with both lists maintained at that level.	-
151		RCG would first suggest clarifying what is meant by “Stakeholder Engagement in Continuous Review and Improvement of the GSTC Accreditation,” as seen on page 14. Further clarification on what will be done publicly with this stakeholder engagement is needed.	Not only public consultation; it is stated in the section when stakeholders have inquiry & suggestion etc, they can communicate via acc@ and we have also Grievance Procedure for stakeholder engagement. We might specify what we do for stakeholder engagement (I think no need but if it is necessary, my suggestion is below)	-
152		RCG suggests defining “suspension, cancelation, extension, withdrawal or scope reduction” as seen in 7.8.	This has been defined on the Accreditation Procedure, please refer to Accreditation Procedure	-

Annex B. Comment log - Assurance Panel

GSTC Assurance Panel members reviewed the initial draft of the Manual before the public consultation began and provided comments on successive drafts throughout the revision process.

Comment Log

No.	Clauses from the initial draft	Comment Received	Result
1	<p>8.5.15.6.1. If either of the aspects listed in this clause apply, the client shall be considered high risk:</p> <p>a. When the client's location and/or operations have a significant likelihood of causing negative environmental, social, economic, and cultural impacts in a sensitive area.</p> <p>b. When the Rule of Law and Control of Corruption of the country in which the client operates are both above 60 points according to BSCI Countries' Risk Classification.</p>	<p>1. I think that the term "significant likelihood and consequences" is not clear, how do we define the significance of it?</p> <p>I also think that taking into consideration the "Rule of Law and Control of Corruption scores" to classify a client as high risk is not the best way to do it, those indicators are made to reflect a total different thing (Governance effectiveness, corruption and political stability) which would say very little of the specific situation of a client, that would be automatically classified as high risk just for its location.</p> <p>2. How does the GSTC define "minimal likelihood and consequences"? this is not clear to me.</p> <p>Same comment on the use of the "Rule of Law and Control of Corruption scores" to classify a client's risk. I think the level of risk of each client should be given by its specific context, the complexity of its operations and the type and number of non-compliances detected during the certification audit.</p>	No change
2	<p>8.5.15.12. When the scope of certification is H/A:</p> <p>8.5.15.12.1. On-site audits shall follow Clause 8.5.15.11.</p> <p>8.5.15.12.2. Surveillance audit shall occur annually. If a client is classified as high-risk H/A, the CB shall conduct an on-site surveillance audit.</p> <p>8.5.15.12.3. Audit shall be more than one (1) day for high-risk situations. Exceptions are allowed for extremely low-risk cases following Clause 8.5.15.12.6.</p> <p>8.5.15.12.4. Surveillance audits may be conducted remotely, in a hybrid format, or on-site, depending on the CB's risk assessment of the client.</p> <p>8.5.15.12.5. If a client is classified as extremely low-risk, the CB may conduct a Remote Surveillance audit following the GSTC Remote Audit Guidelines for the H/A and IAF MD 4:2022. If the client has some conformity issues, but the CB can justify a hybrid audit, they may opt for a hybrid.</p>	<p>I would recommend defining how frequently, so we do not leave the door open for subjectivity in this point. Same comment for section 8.5.12.11.2</p> <p>If we are defining the minimal duration of the audits in each case, I would remove the word "Typically", it does not add anything to the sense of the paragraph. Also, if those are the bare minimum for each audit, the CB should not be able to provide justification of fewer days/hours and if they want to increase the number of days, why should they provide any additional explanation?</p> <p>8.5.12.9.3. Audits shall be set for a duration at the discretion of the CB based on risk evaluation, elements to be audited, and other</p>	<p>Reflected to the next draft version</p> <p>8.5.12.9.2. On-site audits shall follow 8.5.12.8. Surveillance audits for high-risk H/A shall be conducted on-site more frequently.</p> <p>8.5.12.9.3. Audit shall be more than 1 day for high risk situations. Exceptions are allowed for extremely low risk cases following 8.5.12.9.7.</p>

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	<p>8.5.15.12.6. Extremely low-risk H/As shall comply with the following:</p> <ul style="list-style-type: none"> a. Twenty (20) or fewer guest rooms and five (5) or fewer staff; b. With no meetings, weddings, or function spaces and activities; c. Locally owned but not belong to a multi-site organization; d. Not located in sensitive areas defined in Clause 8.5.15.6.5.; and e. With access to the internet and/or broadband for using information and communication technology when participating in remote audits, when appropriate. 	<p>factors as appropriate. Audits should be at minimum ½-day (4 hours).</p>	
3	<p>8.5.15.13. When the scope of certification is TO :</p> <p>8.5.15.13.1. On-site audits shall follow Clause 8.5.15.11.</p> <p>8.5.15.13.2. Surveillance audit shall occur annually. If a client is classified as a high-risk TO, the CB shall conduct an on-site surveillance audit.</p> <p>8.5.15.13.3. Audit duration shall be, at minimum, half a day (4 hours) for extremely low-risk, but more than two (2) days (16 hours) for high-risk situations.</p> <ul style="list-style-type: none"> a. The CB shall provide justification whenever it assigns fewer than two (2) days. <p>8.5.15.13.4. Surveillance audits may be conducted remotely, in a hybrid format, or on-site, depending on the CB's risk assessment of the TO.</p> <ul style="list-style-type: none"> a. If a TO is classified as extremely low-risk, the CB may conduct a remote audit following the GSTC Remote Audit Guidelines and IAF MD 4:2022. b. If the TO has some conformity issues, but the CB can justify a hybrid audit, the CB may opt for a hybrid audit for the TO. c. If the TO is classified as high-risk, the CB shall conduct an on-site audit. <p>8.5.15.13.5. Extremely low-risk TOs shall comply with the following:</p> <ul style="list-style-type: none"> a. Five (5) or fewer staff. b. Operating tours in a small geographical area like a village, town, or city with a limited population and businesses. Or, c. Operating ten (10) or fewer fixed tours using a small number of suppliers. <p>8.5.15.13.6. The CB shall justify the conditions in Clause 8.5.15.13.5.</p>	<p>I would recommend defining how frequently, so we do not leave the door open for subjectivity in this point. Same comment for section 8.5.12.11.2</p> <p>If we are defining the minimal duration of the audits in each case, I would remove the word "Typically", it does not add anything to the sense of the paragraph. Also, if those are the bare minimum for each audit, the CB should not be able to provide justification of fewer days/hours and if they want to increase the number of days, why should they provide any additional explanation?</p>	<p>Reflected to the next draft version</p> <p>8.5.12.10.2. On-site audits shall follow 8.5.12.8. Surveillance audits for high-risk TO shall be conducted on-site more frequently.</p> <p>8.5.12.10.3. Audit duration shall be at minimum, 1/2-day (4 hours) for extremely low-risk, but more than 2 days (16 hours) for high-risk situations.</p> <ul style="list-style-type: none"> a. The CB shall provide justification whenever it assigns fewer than 2 days.
4	<p>8.5.15.14. When the scope of certification is Tour Product (TP):</p> <p>8.5.15.14.1. On-site audits shall follow Clause 8.5.15.11.</p> <p>8.5.15.14.2. Surveillance audits shall occur annually. If a client is classified as a high-risk TP, the CB shall conduct an on-site surveillance audit.</p> <p>8.5.15.14.3. The duration of on-site audits is one (1) day, with a minimum duration of half a day (4 hours).</p> <ul style="list-style-type: none"> a. The CB shall provide justification whenever it assigns less or longer duration. <p>8.5.15.14.4. Surveillance audits may be conducted remotely, in a hybrid format, or on-site, depending on the CB's risk assessment of the TP.</p> <ul style="list-style-type: none"> a. If the TP is extremely low-risk, the CB may conduct a remote audit following the GSTC Remote Audit Guidelines and IAF MD 4:2022. b. If the TP has some conformity issues, but the CB can justify a hybrid audit, the CB may opt for a hybrid audit for the TP. c. If the TP is classified as high risk, the CB shall conduct an on-site audit. <p>8.5.15.14.5. Extremely low-risk TPs shall comply with the following:</p> <ul style="list-style-type: none"> a. Not include any sensitive areas defined in Clause 8.5.15.6.5.; b. All suppliers have been certified/verified sustainable by third parties; c. The tour duration is four (4) hours or less. 	<p>I would recommend defining how frequently, so we do not leave the door open for subjectivity in this point. Same comment for section 8.5.12.11.2</p>	<p>Reflected to the next draft version</p> <p>8.5.12.11.2. On-site audits shall follow 8.5.12.8. Surveillance audits for High-risk TP shall be conducted on-site more frequently.</p> <p>8.5.12.11.3. The duration of on-site audits is 1 day, with a minimum duration of half a day.</p> <ul style="list-style-type: none"> a. The CB shall provide justification whenever it assigns less or longer duration.
5	<p>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 provided by internationally and nationally recognized training organizations. GSTC accepts one of the formal training on such as ISO 9001 Quality Management Systems, ISO 14001 Environmental Management Systems, or other ISO standards or other relevant standards, provided by internationally and nationally recognized training organizations to fulfill this</p>	<p>Why do we talk about days? Normally all training programs are delivered in hours, specially those online, Remote or Hybrid training programs, I think this should be changed from days into hours. Same comment for section 10.8.2</p>	<p>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 provided by internationally and nationally recognized training organizations.</p> <p>10.8.2. Training on auditing by organizations relevant to tourism</p>

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	<p>requirement; or</p> <p>10.8.2. Training on auditing by organizations relevant to tourism standards. The auditor shall have successfully completed training equivalent to other auditor training programs, as described in Clause 10.8.1, with a minimum of the following areas, via online or offline:</p>		<p>standards. The auditor shall have successfully completed a 3-days training equivalent to other auditor training programs, as described in 10.8.1 with a minimum of the following areas, via online or offline</p>
6	<p>10.9.3.2. Completed at least 20 audits of Hotel/Accommodation/Tour Operator against a GSTC-Recognized Standard or the GSTC Criteria completed within the previous 3 consecutive years.</p> <p>10.9.3.2.1. If some or all of the 20 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.</p>	<p>Just consider that we passed through a COVID-19 pandemics that caused a total closure of the tourism industry for months and even years in some destinations and performing 20 audits during the past 3 years was a very difficult task for many auditors, I would reconsider this point.</p>	<p>No change</p>