



Institutionalization and legitimization of sustainable tourism standards: The role of the Global Sustainable Tourism Council

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Abstract

Tourism is a complex activity involving multiple stakeholders, both public and private. Consequently, the transformation of the sector, in any sense, requires the collaboration of multiple actors and the consideration of its various dimensions, including in regulatory terms. The Goals established in the 2030 Agenda and their embodiment in the concept of sustainable tourism particularly highlight this need. It is within this context that our object of study, the Global Sustainable Tourism Council (GSTC), is situated. Its analysis provides a valuable opportunity for a concrete exploration of the potential and limitations of this type of governance mechanism in a sector characterized by its complexity, its transnational scope, and its growing relevance in sustainable development agendas. The details of GSTC institutional configuration will reveal the strengths and limitations of its legal nature and the foundations of its legitimacy, from the perspective of its composition, internal functioning and its mandate. On this basis, we identify the GSTC's contribution to the construction of the notion of 'sustainable tourism' and its international application. The final sections present our overall assessment and proposals arising from the analysis.

Key words

GSTC, private governance, sustainable tourism, multistakeholder partnerships, standards.

Resumen

El turismo es una actividad compleja en la que intervienen múltiples actores, tanto públicos como privados. La transformación del sector, en cualquier sentido, requiere por tanto la colaboración de diversos actores y la toma en consideración de sus

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distintas dimensiones, también en términos regulatorios. Los Objetivos establecidos en la Agenda 2030 y su concreción en la noción de turismo sostenible evidencian muy particularmente esta necesidad. En este marco se sitúa nuestro objeto de estudio: el Consejo Global de Turismo Sostenible (Global Sustainable Tourism Council, GSTC). Su análisis ofrece una excelente oportunidad para explorar de manera concreta las potencialidades y limitaciones de este tipo de mecanismos de gobernanza en un sector caracterizado por su complejidad, su alcance transnacional y su creciente relevancia en las agendas de desarrollo sostenible. Así, los detalles de su configuración institucional evidenciarán las virtualidades y límites de su naturaleza jurídica y los fundamentos de su legitimidad, atendiendo a su composición, su funcionamiento interno y su mandato. Sobre esta base, identificamos la contribución del GSTC a la construcción de la noción de «turismo sostenible» y a su aplicación internacional. Los apartados finales del artículo recogen nuestra valoración global y las propuestas que se derivan del análisis realizado.

Palabras clave

GSTC, gobernanza privada, turismo sostenible, alianzas multipartes, estándares.

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1. Introduction

Tourism is a complex activity involving multiple stakeholders, both public and private. In economic terms, the supply side consists of a wide variety of private entities (tour operators, hotels and lodging establishments, transportation services, restaurants, etc.) whose combined efforts meet the demand, namely “the tourist.” At the same time, a wide variety of public authorities exercise powers that directly impact the functioning of this activity through various regulatory instruments, such as operating licenses, accessibility and transportation regulations, the designation of protected areas, and the imposition of tourism and congestion fees, among others. All of this is governed, not by regulations specific to “tourism”, but by sector-specific regulations—due to the multidimensional nature of tourism—that affect the various activities through which tourism manifests. This multiplicity of actors and regulatory spheres creates a specific challenge in terms of governance, further amplified when we consider the global nature of the tourism phenomenon, as the specialized literature has long highlighted (Byrd 2007, Bramwell and Lane 2011).

The transformation of the sector, in any sense, requires the collaboration of multiple actors and the consideration of its various dimensions, including in regulatory terms. The Goals established in the 2030 Agenda and their embodiment in the notion of sustainable tourism particularly highlight this need: tourism “that takes full account of current and future economic, social, and environmental impacts to meet the needs of visitors, the industry, the environment, and host communities” (United Nations Environment Programme—UNEP—and World Tourism Organization—UNWTO—2005). It is within this context that our object of study, the Global Sustainable Tourism Council (GSTC), is situated. The analysis below seeks to identify its contribution to the governance of sustainable tourism and to defining the content associated with this concept.

This analysis provides indeed a valuable opportunity to examine some of the transformations that have occurred since the beginning of the century in the modalities of international cooperation. In particular, the growing recognition of the multidimensional nature of the challenges facing international society has underscored the need to involve all relevant actors in efforts to address and manage them—not only states and international organizations, but also non-state actors, whether public or private. This perspective has been reinforced by additional developments, most notably the globalization of economic and political models following the end of the East–West divide; the diminishing role of the state in the provision of public services; the jurisdictional constraints inherent in international organizations and intergovernmental cooperation frameworks; and the progressive identification of global commons and global public goods (Jönsson 2013, Blokker 2016, Martens 2020, UNSCR A/75/982 2021). Certainly, the participation of non-state actors in decision-making processes and intergovernmental structures is not a new phenomenon (Martens 2007, Hachez 2008, Aziz 2012). However, with a few notable exceptions, such participation has been in an auxiliary capacity and has taken place within the framework of multilateral structures that are eminently inter-state in nature.

Scholars generally agree that the 1992 Rio Conference and the adoption of Agenda 21 marked a turning point, signaling a new approach toward the establishment of

“structures for multi-stakeholder international collaboration” (Abbott and Snidal 2009, Abbott 2012, Lundsgaarde 2016, Krisch 2017, Scholte 2020, Andonova *et al.* 2022). Under various names, these structures appear to signal the evolution of multilateralism toward a form of multilevel and multiparty governance, driven in fact by the multilateral bodies themselves (Abbott *et al.* 2015, Andonova 2017). Their establishment forms part of the internationally coordinated responses designed to address, in the face of the limitations of intergovernmental cooperation, the needs of ‘global governance’ and the regulatory changes it demands (Schaller 2007, Marx and Wouters 2016, 2018, Pauwelyn *et al.* 2022). The 2030 Agenda includes its support for this type of framework in SDG 17, which calls for joint action by public and private entities and civil society (“multi-stakeholder partnerships”) to develop and implement projects and initiatives that contribute to the achievement of its goals. Since 2007, the United Nations General Assembly has consistently provided the following definition of ‘partnerships’: “voluntary and collaborative relationships between various parties, both public and non-public, in which all participants agree to work together to achieve a common purpose or undertake a specific task and, as mutually agreed, to share risks and responsibilities, resources, and benefits” (A/RES/56/76, A/RES/58/129, A/RES/60/215, A/RES/66/223, A/RES/68/234, and A/RES/73/254, among others). Specifically in the tourism sector, these types of arrangements are part of a broader governance model—described as “polycentric governance”—which, according to recent studies, can be more effective in strengthening the range of enabling drivers for intensifying climate action (Becken and Loehr 2024, p. 1758).

Methodologically, the study relies primarily on desk research and documentary analysis, using international law as a key analytical framework to critically examine whether and to what extent the GSTC contributes to global governance in the ways identified in the literature as potential benefits of the multistakeholder partnerships models. This legal-doctrinal analysis is complemented by theoretical perspectives on global governance, particularly global administrative law and polycentric governance. These perspectives provide additional analytical lenses for examining the GSTC’s institutional structure, decision-making processes and regulatory functions, while situating its governance practices within broader debates on the organization and legitimacy of transnational regulatory arrangements. The analysis seeks to distinguish between shortcomings related to the GSTC’s design and those that may reflect broader limitations of the multistakeholder governance model itself. The findings are intended to inform recommendations aimed at improving sustainable tourism governance, while also contributing to broader reflections on the design of a more inclusive form of multilateralism capable of addressing contemporary global challenges.

Thus, an examination of the GSTC’s institutional architecture will reveal the strengths and limitations arising from its legal nature, as well as the foundations of its legitimacy, from the perspectives of its composition, internal functioning, and mandate. On this basis, the analysis identifies the GSTC’s contribution to the construction of the notion of ‘sustainable tourism’, while also examining the broader implications of its role as a form of private, multistakeholder transnational governance. As discussed in the final sections of the article, such governance arrangements can contribute to the dissemination and coordination of sustainability goals, but their normative and regulatory authority

requires an international legal and institutional framework that ensures representativeness, transparency, independence, participation, and accountability.

2. The institutional architecture of the GSTC

2.1. *Origins and legal nature*

The creation of the GSTC is the result of two parallel processes. The first was the so-called “Partnership for Global Sustainable Tourism Criteria,” an initiative formed in 2007 as a coalition of 32 partners, initiated by the Rainforest Alliance, the United Nations Environment Programme (UNEP), the United Nations Foundation (UN Foundation), and the United Nations World Tourism Organization (UNWTO), but also including industry associations, regional sustainable tourism partnerships, and other international institutions.² The purpose was to foster increased understanding of sustainable tourism practices and the adoption of universal sustainable tourism principles through the development of a set of universal, globally accepted criteria. The first version of these criteria was launched in October 2008 at the IUCN World Conservation Congress. The second “process” began in 2009 with the creation of the Sustainable Tourism Stewardship Council (STSC) to give structure to regional certification networks that had begun forming in 2003. To that end, the STSC proposed the development of a mechanism to accredit certifying bodies or certification programs based on their performance and help ensure that certification is conducted in an objective and transparent manner, thereby building credibility with both consumers and businesses.

The broad overlap in objectives as well as the complementarity between both initiatives (the Global Criteria for Sustainable Tourism were to form the basis of the accreditation system proposed by the STSC) led to the decision to merge them into a single body: the Global Sustainable Tourism Council (GSTC), formally established in 2010. The UN Foundation facilitated the merger, also providing the Secretariat through the end of 2012.

In formal legal terms, the GSTC is a nonprofit organization, legally registered in the United States as a “501(c)(3) nonprofit corporation” and positions itself as a science-based, multi-stakeholder organization (GSTC Bylaws 2025, Art. II Section 1). It is therefore a legal entity under domestic law that typically falls into the category of NGO, whose legal capacity is limited to the state of incorporation and, where applicable, to those other states in which it decides to establish branches or facilities under the protection of those state laws. Due to the country chosen, the GSTC lacks the specific features offered by legislations such as those of Switzerland or Austria, which provide for the existence of “international non-governmental organizations” to which they confer a specific status, distinct from that of international organizations and that of

² Additional members of the GSTC Partnership were the American Hotel & Lodging Association (AH&LA), American Society of Travel Agents (ASTA), Caribbean Alliance for Sustainable Tourism (CAST), Choice Hotels, Conde Nast Traveler, Conservation International (CI), ECOTRANS, Expedia, Inc., Federation of Tour Operators (FTO), HM Design, Hyatt Hotels and Resorts, Instituto do Hospitalidade, International Hotel & Restaurant Association (IH&RA), the International Council on Monuments and Sites (ICOMOS), the International Union for the Conservation of Nature (IUCN), Kenyan Ecotourism Society, the Secretariat of the Convention on Biological Diversity (SCBD), Solimar International, Sustainable Travel International (STI), Tourism Concern, Travelocity/Sabre, and VISIT. See <https://www.gstc.org/about/gstc-history/>

NGOs, and which does indeed grant certain privileges.³ Nor do the GSTC's Statutes permit any interpretation that could justify classifying the GSTC as a body or program of an international organization. In fact, they do not provide for any relationship with existing international organizations competent in the field of tourism, not even with those that promoted its creation (namely, UNWTO, ICOMOS-UNESCO or UNEP-UN, which provided also significant funding to launch the GSTC).

The adoption of the “non-profit organization” model under domestic law is the most common legal structure for establishing these new forms of international collaboration. It appears particularly well suited to cases such as the present one, where the activity in question is predominantly private in nature, as are most of the actors involved in its implementation, and where public regulatory intervention remains, at best, fragmented. That said, this legal formalization fosters an eminently private view of the issue—in our case, tourism and the transformation it requires in terms of sustainability—which, as we shall see, is reflected in the composition of the GSTC.

2.2. Membership and representation

Since its inception, the GSTC's aim has been to bring together a wide range of stakeholders, as reflected in the definition of “members” included in its Statutes or Bylaws: members “shall be stakeholders in tourism, including (but not limited to): public authorities and intergovernmental organizations; multilateral organizations that include tourism; the private sector, including tourism-related businesses; service providers and associations; certification schemes; non-governmental organizations (“NGOs”); universities and other educational institutions; media and communications groups; and consumer associations.”

Although this is a non-exhaustive list, membership appears to be conceived from the perspective of actors involved in some way in tourism activities, without accounting for groups that may be affected by these activities, such as local destination communities. Obviously, nothing precludes the possible participation of these communities as GSTC members through their establishment as NGOs. Aside from that possibility, the GSTC also does not seem interested in incorporating groups involved in the social dimension of sustainable tourism, as it makes no mention of trade unions or entities representing workers in the sector, whose participation in carrying out the GSTC's functions would be of obvious interest as true ‘stakeholders in tourism’.

The general scope of the statutory provision has been systematized through the establishment of categories for the corresponding allocation of the quota system.⁴ Thus, there are three types of members: (i) Destination and Government members (available to governments and destination organizations at the municipal, provincial, or national level) (ii) Organization members (which include four categories of industry, two of civil society or NGOs, and a separate category for academia and educational institutions) and (iii) Individual members (a category open to individual tourism industry stakeholders

³ An example is the Austrian Federal Law on the Granting of Privileges to Non-Governmental International Organisations (1992, 2015).

⁴ Detailed information about GSTC membership conditions and admission procedure is available at: GSTC, *Membership Categories & Fees* (<https://www.gstc.org/become-a-gstc-member/membership-categories-and-fees/>),

who are engaged in sustainable tourism—for example, independent consultants and freelance professionals—and would like to support and contribute to the GSTC's work of spreading sustainability practices in travel and tourism). These categories have thus overlooked the possibility that intergovernmental and multilateral organizations could become members of the GSTC, in accordance with its Statutes, in light of practical evidence. The application for membership is processed through a simple online form (the same for Destinations and Organizations, and a different one for Individuals) that includes payment of the corresponding fee. After that, the Statutes regulate a simple admission procedure that assigns to the Secretariat the decision to accept a new member. In the case of any doubt regarding the validity of an entity as a member, the Secretariat shall bring the matter to the Executive Committee of the Board for review.⁵

The GSTC Membership Policy further specifies the limited commitments set out in its Statutes for a candidate to become a member, namely to strive to adhere to the GSTC Standards in their activities and to promote their dissemination and use (GSTC Bylaws 2025, Art. III Section 3). Thus, and in line with the principles generally associated with good faith and fair cooperation, the 'membership policy' details the conduct required by both commitments, sets forth the obligation not to engage in or be involved in activities that compromise the reputation of the GSTC or have a negative impact on the work of the GSTC, and provides that, in extreme cases, members who demonstrate unprofessional and negative behavior will be expelled from the organization at the discretion of the GSTC Board.⁶

Despite the limitations already mentioned, the composition of the GSTC's membership reflects its purpose to achieving a certain level of sectoral representation. This goal, however, raises several questions: What types of destination organizations are members? Are the world's major tourist regions represented? What types of companies and NGOs are involved? And so on. The GSTC website and Annual Reports provide answers to some of these questions. Regarding its geographic representation, the GSTC has members from all regions of the world, though not in equal measure. Thus, Europe, Asia, and North America are the regions with the largest number of GSTC members, while Africa is almost entirely unrepresented. An imbalance that grounds much of the criticism of international institutions voiced from the "Third World Approaches to International Law" (TWAIL) scholarship (Becker Lorca 2023). The category with the highest number of GSTC members is industry micro (more than 200 of 518 total members), followed at a considerable distance by NGOs and local governments. Regarding sectors, consulting and tour operators (inbound) remain the ones with the highest number of GSTC members (GSTC Annual Report 2024, p. 29; Annual Report 2025 p. 28). The data should be interpreted with caution, as the reporting methodology is not always consistent and is not presented in the same format on the website and in the GSTC's annual reports. This makes it difficult to conduct an in-depth analysis of the GSTC's representativeness or the degree of 'balance' among the different member categories.

⁵ Grounds for concern may include, but are not limited to, issues regarding the applicant's legal registration or the sincerity of the organization's commitment to sustainability and to the GSTC's mission (GSTC Bylaws 2025, Art. III Section 5).

⁶ See GSTC, *Membership policy* (<https://www.gstc.org/become-a-gstc-member/membership-policy/>).

2.3. Governance and decision-making

Based on the 2025 amended Bylaws, the GSTC is structured as a multi-tiered nonprofit organization that integrates strategic governance, executive management, technical oversight, and stakeholder participation. At the apex of the organizational structure is the Board of Directors, which holds ultimate authority. The Board is composed of 21 voting members plus the Chief Executive Officer (CEO), who is an ex-officio member but without voting rights. Regarding voting members, 12 “at-large” members are selected through an open nomination and election process by GSTC members, and up to 8 are appointed by the Board to outstanding individuals and organizations that will further the mission and vision of the GSTC. In both cases, the Bylaws require ensuring balanced representation across stakeholder categories, geographic regions, and gender (GSTC Bylaws Art. IV, Section 5.2).

Operational leadership is delegated to the CEO, who is appointed by and reports directly to the Board. The CEO heads the Secretariat, which functions as the executive and administrative arm of the GSTC and is responsible for the organization’s day-to-day operations. This separation between governance and management reflects established principles of nonprofit corporate governance, whereby strategic oversight remains with the Board while operational execution is centralized within a professional management structure.

GSTC’s functions are supported by standing and ad hoc committees. The Bylaws expressly provide for three: the Executive Committee, which may act on behalf of the Board between meetings within defined limits; the Technical Advisory Committee, which provides non-binding expert recommendations on accreditation, standards, and technical matters; and the Election Committee, which safeguards procedural integrity in nominations and elections. The Board may establish additional committees as needed. The committee system seeks to promote efficient governance while integrating specialized expertise into decision-making. GSTC may also establish member-based working groups to provide thematic and technical input to the Board and Secretariat, without formal decision-making authority.

In addition to this internal dimension, the GSTC’s governance also has an external dimension. Since September 2021, the GSTC has been part of a network of organizations dedicated to the development of “sustainability systems,” brought together under the auspices of the International Social and Environmental Accreditation and Labelling Alliance—ISEAL (GSTC Annual Report 2025, 19, 24). This nonprofit organization, incorporated as a ‘charity’ under British law, provides guidance on the development and management of sustainability standards and currently brings together 45 organizations developing sustainability criteria across various sectors (Bernstein 2011). ISEAL advocates for the development and adoption of credible, effective sustainability systems, and works to promote the conditions for their uptake. ISEAL members are sustainability systems and accreditation bodies. By fostering credible practices and driving impactful changes, ISEAL’s stated aim is to make markets a “force for good”, helping companies and governments meet their sustainability commitments and achieve the UN Sustainable Development Goals (SDGs). Obviously, this implies that all member organizations work under common parameters for the design of ‘sustainability systems’ in their respective sectors. According to Loconto and Foulleux, “ISEAL puts specific

strategies into place to both reinforce and expand the role and influence of sustainability standards [...] institutionalizing macro-standards based on a market-driven and procedural vision of sustainability; and simultaneously legitimizing both the tools and ISEAL through internal and external enrolments and entanglements” (Loconto and Fouilleux 2014, p. 166). Following a similar logic, since 2024, GSTC has also been a member of the International Accreditation Forum (a global association of accreditation bodies and other organizations interested in conformity assessment) and an Associate Member of the Inter-American Accreditation Cooperation (a regional association of accreditation bodies and other organizations interested in conformity assessment in the Americas) (GSTC Annual Report 2024, p. 34).

2.4. Mission and operational approach

The GSTC Bylaws stipulate that it will operate exclusively for educational, scientific, and charitable purposes, with its mission being to promote sustainability in tourism through three lines of action: (i) fostering increased knowledge and understanding of sustainable tourism practices, (ii) promoting the adoption of universal sustainable tourism principles, and (iii) building demand for sustainable travel (Art. II, Section 1).

The GSTC therefore embraces the notion of sustainable tourism as a normative concept that aims to regulate tourism development within the sustainability paradigm, balancing its three dimensions through a participatory process involving “all” stakeholders. This normative concept reflects an understanding of tourism that is explicitly stated in the so-called ‘GSTC vision’: “Tourism fulfills its potential as a vehicle for social, cultural, and economic good while removing and avoiding any negative impacts from its activities in terms of environmental and social impacts” (GSTC Annual Report 2025, p. 13).

This is a positive vision of tourism, as an activity with potential economic, social, and cultural benefits. The GSTC stands apart from anti-tourism movements and positions and adopts an approach that connects with the origins of organizations such as the World Tourism Organization (WTO), which encourages the promotion and development of tourism not only to contribute to economic growth, but also “international understanding, peace, prosperity, and universal respect for, and observance of, human rights and fundamental freedoms for all, without distinction as to race, sex, language, or religion” (WTO Statutes, Art. 3). This positive vision transcends purely economic conceptions of tourism and highlights its impact on knowledge and cultural exchange, as do other organizations, including UNESCO itself (Huici Sancho 2025).

Alongside this positive approach, another characteristic of the “GSTC vision” is its proactive stance toward the negative effects of tourism, as it considers both the feasibility of eliminating those that have already occurred and of structuring tourism activities in a way that prevents them from arising. It is against this dual understanding that the objectives assigned to the GSTC in Article 1 of its Statutes must be interpreted, which the organization summarizes as follows in its annual reports: “To be an agent of change in the world of sustainable travel and tourism by fostering the increased knowledge, understanding, adoption, and demand for sustainable tourism practices” (GSTC Annual Report 2024, p. 14).

The GSTC's approach to tourism has an operational application, grounded in the "theory of change." This is a methodological approach used in strategic planning, project management, and impact assessment to explain how and why a desired change is expected to occur in a specific context—in our case, the achievement of sustainable tourism. It is used to measure the impact of programs and interventions aimed at bringing about change in a given social context and it is inspired by the ideas published in the 1990s by Carol Weiss, an expert in evaluation, social program analysis, and public policy. By the end of the 20th century, this methodology had become a key component of major United Nations programs (Vogel 2012, Valters 2014, UN Development Group 2017, Manrique Molina 2023). Using this approach, the GSTC identifies the results to be achieved and defines the activities to be carried out to achieve them. Specifically, the GSTC has established the following intended impacts and outcomes (GSTC Annual Report 2025, p. 13):

- Provide guidelines for businesses and destinations of all sizes and all over the world to become more sustainable.
- Provide guidance for travelers and travel providers in choosing suppliers and sustainable tourism programs.
- Provide a common framework for the media to recognize sustainable tourism providers.
- Help certification and other voluntary programs ensure that their standards meet a broadly accepted baseline.
- Governmental, non-governmental, and private sector programs have a framework for developing sustainable tourism requirements.
- Provide guidelines for educational and training institutions such as hotel schools and universities.

To achieve these goals, the GSTC currently carries out five types of activities: defining global standards for sustainability in travel and tourism; providing assurance for sustainable tourism through the accreditation of certification bodies and the recognition of standards; promoting sustainable destinations and market access; and increasing knowledge. These activities constitute the normative and regulatory functions performed by the GSTC as a transnational standard-setter in sustainable tourism governance.

3. The GSTC as a transnational standard-setter in sustainable tourism governance

3.1. Development of sustainable tourism standards

The primary function of the GSTC is to establish sustainable tourism standards that serve as a global benchmark for assessing the sustainability of tourism activities, both for industry and for destinations. Its development process has been designed in accordance with a "code of standards"—based on ISO standards—,⁷ which was agreed

⁷ In 2005, the International Organization for Standardization (ISO) established a specific technical committee, ISO/TC 228, responsible for developing internationally accepted standards for the terminology and specifications of services offered by tourism service providers, including related activities, tourist

upon within the ISEAL Alliance. Within this framework, and as reported by the GSTC itself, this process includes consultations with sustainability experts and the tourism sector, consideration of existing voluntary and certification standards, and consultation with conservationists, industry leaders, government authorities, and UN agencies.

The representativeness of the stakeholders consulted and the scope of the procedure used are obviously linked to the GSTC's own capacity to involve 'all stakeholders' in the calls it periodically issues for the development and review of its standards. Information on this is provided in the GSTC's Annual Reports (the last one on 2025, p. 24). For example, the development of the MICE Standards (for Venues, Event Organizers, and Events & Exhibitions) involved an Advisory Group composed of the Sustainable Hospitality Alliance (Global), Visit Berlin (Europe), Visit Oslo (Europe), Green Key Global (America), Osaka Convention Bureau (Asia), Suwon Convention & Visitor B s Bureau (Asia), and the Singapore Tourism Board (Asia), as well as a Key Stakeholders Group comprising American Express Global Business Travel (Global), the Costa Rican Tourism Institute (Costa Rica Tourism Board) (America), the International Congress & Convention Association (Global), Meeting Select (Europe), the Türkiye Tourism Promotion and Development Agency (Europe-Asia), and the Japan Convention Service (GSTC Annual Report 2024, p. 26). Following this same logic, the standards undergo evaluation programs, such as the one applied to the Destination Standards ("Early Adopter program") across a wide range of locations and contexts, including, among others, Cusco, Peru; Lake Llanquihe, Chile; the Riviera Maya, Mexico; Lanzarote, Spain; and Mara Maboisho, Kenya (Bushell and Bricker 2017).

In terms of content, the GSTC Standards are organized into four pillars: Sustainable Management, Socio-economic Impact, Cultural Impact, and Environmental Impact (including resource consumption, pollution reduction, and the conservation of biodiversity and landscapes). Using this same structure, six sets of standards have been developed to date, respectively targeting: Hotels, Tour Operators, Tourist Destinations,⁸ MICE (with specific indicators for venues, event organizers, and Event & Exhibitions), Attractions (including but not limited to theme parks, national parks, and museums), and Food & Beverage. Given their development process, the current GSTC standards were adopted at different times and, in some cases, have already been revised.⁹ In all cases, the objective is to establish 'the minimum' to be met—that is, basic sustainability guidelines to which the stakeholders involved in each case should aspire—and to

destinations, and the requirements for the facilities and equipment used by them, with the aim of providing tourism buyers, suppliers, and consumers with criteria for making informed decisions. However, the primary function of this committee is not to define sustainability standards for tourism activities or services. See: ISO/TC 228, *Who we are* (<https://committee.iso.org/home/tc228>).

⁸ The GSTC retains the definition of "destination" adopted by the UNWTO: "a physical area, with or without administrative and/or analytical boundaries, where a visitor can stay overnight. It is the collection (joint location) of products and services, as well as activities and experiences across the tourism value chain, and a basic unit of analysis for tourism. A destination involves various stakeholders and can be networked to form a larger destination." See: GSTC, *GSTC Standards Overview* (<https://www.gstcouncil.org/gstc-criteria/>).

⁹ The first to be adopted were industry standards in 2008, whose latest revision in 2025 led to the distinction between Hotel Standards and Tour Operator Standards. The standards for Destinations were first adopted in 2013 and revised in 2019. The MICE Standards and the Attractions Standards were adopted in 2024 and the most recent, the Food and Beverage Standard, in July 2026. See: GSTC, *History of GSTC* (<https://www.gstc.org/about/gstc-history/>).

indicate what must be done, not how it must be done, an aspect addressed through performance indicators and other implementation tools. They are therefore standards in the strict sense: instruments that encourage the “pursuit or achievement of a value, a goal, or an outcome, without specifying the action(s) required” to achieve this, in contrast to a legal rule, which prescribes what its subject must or must not do (Braithwaite and Braithwaite 1995, p. 307).

The aim of providing a common global vision of sustainable tourism and establishing standards applicable anywhere in the world partly explains the wording of these criteria, which have been formulated in terms open to broad interpretation so that they can be adapted to local conditions and supplemented with additional criteria tailored to specific areas and activities (Bushell and Bricker 2017, p. 110). The following GSTC standards for destinations are a good example of the types of terms used:

TABLE 1

B5 Preventing exploitation and discrimination	The destination upholds international human rights standards. It has laws, practices, and an established code of conduct to prevent and report human trafficking, modern slavery, and commercial, sexual, or any other form of exploitation, discrimination, and harassment of or against anyone, particularly children, adolescents, women, LGBT individuals, and other minorities. These laws and established practices are publicly communicated and enforced. ¹⁰
C1 Protection of cultural assets	The destination has a policy and system to evaluate, rehabilitate, and conserve cultural assets, including built heritage and cultural landscapes.
D5 Energy conservation.	The destination has set targets to reduce energy consumption, improve energy efficiency, and increase the use of renewable energy. The destination has a system in place to encourage businesses to measure, monitor, reduce, and publicly report their progress toward these targets.

Table 1. GSTC Standards for Destinations.
(Source: GSTC Destination Criteria, Version 2.0, 6 December 2019.)

In turn, the Standards are supported by performance indicators, which explain how to implement each of them and/or whether the goal has been achieved. Furthermore, in some cases, the indicators refer to specific guidelines that aid in understanding them and/or include references that can be considered. An example can be seen in the following table.

¹⁰ The performance indicators for this standard only include the following complementary statement: “The destination and key tourism stakeholders are signatories to the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism”.

TABLE 2

STANDARD	INDICATORS	GUIDELINES
B6 Code of Conduct The hotel has a written code of conduct to guide the behavior and actions of staff, suppliers, and guests.	1. The hotel maintains a written code of conduct that includes a zero-tolerance policy toward any form of exploitation, harassment, abuse, or human trafficking, in accordance with internationally recognized frameworks. (See Guidelines) ...	1. Internationally recognized frameworks may include the UN Convention on the Rights of the Child, ILO Conventions on Forced and Child Labor, and the UN Guiding Principles on Business and Human Rights. ...

Table 2. GSTC Hotel Standards.

(Source: GSTC Hotel Standard v.4.0 with Performance Indicators and SDGs, December 30, 2025.)

The last table serves to illustrate a certain improvement recently incorporated into the wording of these instruments. The first versions of the GSTC Standards contained very few references to existing rules of international law reflecting the international consensus on key aspects of sustainable development and, by extension, sustainable tourism, such as decent work and fundamental labour rights. Given that these are well-established concepts with broad international support and legal effects, the absence of references in the GSTC Standards implied an apparent lowering of the “minimum requirements” applicable to important areas of sustainable tourism.

The improvements made in the documents adopted since 2024 should therefore be viewed positively, with a notable increase in references to international legislation and/or regulations, specific international treaties, and standards from international organizations. These references are generally incorporated into the performance indicators of the revised or newly adopted standards. Nonetheless, this improvement has not been applied consistently across all new or revised GSTC Standards. Two areas are particularly noteworthy.

The first concerns Exploitation, Harassment, and Human Trafficking. The performance indicators of Attraction Standard B4 adopted in November 2024 require attractions to update and maintain records of all staff, particularly their ages, as evidence of their commitment not to support child labour, as defined and regulated by the relevant International Labour Organization (ILO) conventions, but without specific mention to any of them (GSTC Attraction Standard 2024, p. 12). By contrast, a more detailed indicator has been introduced in the Hotels and Tour Operators Standards revised in 2025, expressly referring to the UN Convention on the Rights of the Child, the ILO Conventions on Forced and Child Labour, and the UN Guiding Principles on Business and Human Rights. It also refers to voluntary initiatives such as The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (GSTC Hotel Standard 2025, p. 28, GSTC Tour Operators Standard 2025, p. 23).

A different pattern of development can be observed in the area of Decent Work. In this case, performance indicators of Attraction Standard B6 and MICE Standard B9 adopted in 2024 require compliance with International Labour Organization (ILO) standards and regulations (GSTC Attraction Standard 2024, p. 12, GSTC MICE Standard 2024, p. 20-21). By contrast, the corresponding indicators of Standard for Hotels and Tour Operators adopted after revision in 2025 only refers more generally to compliance with ILO conventions and standards “where applicable” (GSTC Hotel Standard 2025, p. 13, GSTC Tour Operators Standard 2025, p. 11). Surprisingly, the performance indicators of GSTC Standards concerning the keeping and treatment of animals refer to compliance with applicable international regulations since their first versions, explicitly mentioning the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and relevant International Union for Conservation of Nature (IUCN) guidelines.

Finally, the GSTC’s goal of making its standards a benchmark for sustainable tourism required clarifying their relationship with the multitude of existing sustainable tourism certification schemes. This relationship is particularly relevant because such schemes may incorporate criteria that are more stringent than those of the GSTC Standards and/or specifically tailored to their respective geographic scopes of application (Elhoushy *et al.* 2026). In response, the GSTC has developed a complementary line of action aimed at encouraging and recognizing other standards that comply with the four pillars of the GSTC Standards. GSTC-Recognized means that a sustainable tourism standard has been deemed equivalent to the GSTC Standards and is administered by a standard owner that meets GSTC requirements. Consequently, it means that the ‘recognized standard’ aligns with the GSTC Standards and that any additional clauses do not contradict GSTC requirements (GSTC Annual Report 2023, p. 31 and 2024, p. 35). The list of recognized standards published on the GSTC website declined in 2025 compared with the previous year, from 66 to 48, following the entry into force of more stringent eligibility requirements (GSTC Annual Report 2025, p. 38).

GSTC Recognition thus offers a potential solution to the problem of fragmentation that generally characterizes global voluntary standards (also referred to as the “orchestration deficit”: Abbott and Snidal 2009). This is a function that, for some authors, is part of the potential of private metagovernance (Derkx and Glasbergen 2014), and that highlights a dynamic already identified by the literature: initially, standards compete against each other for market share and legitimacy, but as they co-evolve, standards may also begin to cooperate and adopt complementary roles (Lambin and Thorlakson 2018). At the same time, GSTC Recognition would also demonstrate the possibility of taking local particularities into account in the implementation of sustainable tourism, thereby minimizing the criticisms regarding the globalization of standards raised by some scholars (among others, Strambach and Surmeier 2018, Archer 2022).

3.2. Implementation and monitoring mechanisms

Setting aside the debate over the adequacy and/or scope of the GSTC’s sustainable tourism standards, a specific challenge lies in verifying and monitoring their effective implementation. In this regard, the GSTC has opted for a decentralized mechanism, the operation of which is ensured through a system of “GSTC accreditation” for certification bodies, creating therefore an umbrella that ensures organizations and tourism products

that are accredited meet certain standards of sustainability (following the design agreed for the STSC: Font and Sallows 2002). The accreditation system functions as a sort of 'delegation of regulatory powers,' although it is exercised by a private organization, such that accredited bodies and entities are the only ones authorized to issue the GSTC sustainability certification for a tourism operator or destination. Certainly, the GSTC accreditation system is voluntary. Nevertheless, some scholars have proposed applying the principles of public law to private entities that provide public services and carry out regulatory activities without delegated executive powers (Barnes 2018).

At present, the GSTC has developed two accreditation procedures: one for certification bodies in the tourism industry (distinguishing between hotels/accommodations and tour operators) and another for certification bodies in tourism destinations (GSTC website and Annual Reports). In both cases, accreditation involves the signing of a licensing agreement between the certification body and the GSTC, which specifies the conditions for using the GSTC name and seals, outlines the licensing fees to be paid, and defines the conditions for both the use and withdrawal of the GSTC trademarks. Likewise, accredited bodies must provide the GSTC with the names of the auditors and individuals responsible for managing the certification process, who must have completed a GSTC-approved auditor training course and successfully passed one or more exams to confirm that they possess the specific knowledge of sustainable tourism and GSTC Standards necessary to perform certification tasks. In the specific case of Europe, the GSTC collaborates with national accreditation bodies to streamline the process and ensure alignment with EU regulations.

The risk associated with the GSTC accreditation system for certification bodies (bottleneck) remains partially present, despite the improvements seen over the past two years. Currently, the total number of accredited certification bodies stands at 16: six are authorized to certify hotels/accommodations and tour operators (Bureau Veritas, Control Union, Royal Cert, United Certification Systems Limited, Mauritius Standards Bureau: Blue Oasis, and TSE Global); only one (Vireo Srl) can also certify destinations; two entities (EarthCheck and Green Destinations) are organizations dedicated exclusively to destination certification, and seven are dedicated solely to hotels/accommodations (Albert QA Technic, Dream&Charme, FQC Certification, TRB, GCL International Ltd, TÜV Austria Turk, and TÜV Rheinland).

Beyond the differences mentioned above, it is worth noting that most of the organizations accredited by the GSTC are private service and auditing firms, with the exception of the Mauritius Standards Bureau (a semi-public, non-profit organization based in Mauritius) and Green Destinations (a Dutch NGO). On the other hand, and although the accredited geographic area is generally worldwide, in some cases there are exclusions or a specific list of countries is mentioned (detailed information on accredited entities is available at GSTC website). That said, regardless of their legal status, GSTC accreditation entails a significant financial cost, subject to fees published on the website, which could well lead to the exclusion of entities and companies from the Global South from the system (Mzembe et al. 2020).

3.3. *Dissemination and promotion of sustainable tourism*

The GSTC is a proactive entity when it comes to disseminating its vision and approaches to sustainable tourism. Consequently, it plays a role in spreading and promoting its sustainable tourism practices and standards by offering training courses for tourism professionals. In parallel, it has also launched other initiatives that promote the presence of sustainable offerings in the tourism market and aim to expand a sustainable management model among tourist destinations.

The GSTC Market Access Program (MAP) is an initiative designed to promote certified sustainable businesses by increasing their visibility to travelers and major travel platforms. Through the MAP, GSTC collaborates with online travel agencies and hotel buyers to integrate a filtering system that highlights sustainable hotels based on reliable certifications. This line of action has been facilitated since December 2014 by the merger of the GSTC with the Tour Operator Initiative (TOI), an organization led by large tour operators committed to sustainable value chain development. The filtering system prioritizes accommodations with an accredited certification, and a secondary filter allows for the temporary inclusion of accommodations verified to GSTC-Recognized Standards, supporting the transition toward full accreditation in the future (GSTC Annual Report 2024, p. 38, 2025, p. 41).

In addition to the industry, tourist destinations are the second priority focus of the GSTC's promotional efforts. The goal is to ensure responsible management that allows them to preserve and enhance the distinctive attributes that make them attractive to tourists. To this end, and based on the GSTC Standards for Destinations and other specific programs, a process is promoted through which local communities, government agencies, NGOs, and the tourism sector, adopt a multistakeholder approach to preserve the cultural, environmental, economic, and aesthetic integrity of their country, region, or locality. In particular, the GSTC actively engages with all its destination members, ensuring at least two interactions per member each year. It also organizes regular meetings with them and has designed a destination assessment program to introduce destination management teams to the core elements required to develop sustainable policies and practices. The assessment process allows a destination to participate directly in applying the GSTC Destination Standard, to understand its sustainability status against the world's leading standards, and to identify areas for improvement based on those standards. As of 2025, the GSTC had assessed 53 destinations, including the Cook Islands, Los Angeles County in USA, Birgi and Side in Turkey, and Phuket, Thailand (Annual Report 2024, pp. 32–33, 2025, p. 31–33).

4. **Critical issues and challenges in the design and functioning of the GSTC**

The analysis conducted allows us to affirmatively answer the two questions posed in the introduction: the GSTC does contribute both to the governance of sustainable tourism and to the definition of this concept. A separate issue, however, is whether this contribution can be regarded as positive and/or sufficient. In this respect, our assessment is nuanced.

From a governance standpoint, the GSTC reveals a number of shortcomings that warrant attention. In particular, its composition should be expanded to include entities representing key stakeholders in the sector—especially workers—as well as those

directly affected by tourism activity, such as local communities. This would improve the GSTC's representativeness and, consequently, its legitimacy—a shortcoming of such international institutions that has been highlighted from multiple perspectives (Kingsbury and Casini 2009, von Bogdandy *et al.* 2017). Moreover, experience has shown the limited practicality of its Statutes insofar as they provided for the participation of international organizations as potential “members” of the GSTC, a possibility that has not materialized in practice. Nonetheless, it would be advisable to develop structured forms of cooperation with the United Nations system, and specifically with organizations such as UNWTO, UNESCO, and ILO, given their influence on global sectoral dynamics and on the conceptualization of sustainable tourism. Governance in this field could benefit from models already tested in other domains, where cooperation agreements have been concluded between the United Nations and multi-stakeholder partnerships (for example, in the energy sector through SEforALL: Álvarez-Verdugo 2021). Beyond addressing existing shortcomings, such collaboration would at least foster mutual understanding between intergovernmental and sub-state approaches to tourism governance and could facilitate progress toward mechanisms of public oversight of private regulatory processes. Without undermining the functional autonomy of entities such as the GSTC, such mechanisms should aim to safeguard the public interests at stake, under a substantive understanding of the multistakeholder model. Effective multistakeholderism should entail meaningful participation and a degree of representativeness capable of reflecting the interests of those affected by the standards, all of them. Advancing in this direction would likely require a clearer legal characterization of the GSTC, building on developments in jurisdictions such as Switzerland and Austria, where specific legal frameworks for international non-governmental organizations have been introduced.

The analysis also reveals governance deficits that are common to many private regulatory bodies, particularly in relation to transparency, disclosure, and the predictability of their activities. The GSTC Standards and accreditation system, although formally voluntary, produce clear effects on third parties. Legal scholarship has examined these dynamics from multiple perspectives; notably, Global Administrative Law has advocated for the application of general public law principles to such entities (Barnes 2018, Saavedra 2026). While these contributions are valuable, the scope, functions, and characteristics of these bodies arguably warrant a more tailored approach within International Law. Specifically, a differentiated legal framework should be developed to define their core features and establish minimum operational requirements for their legitimacy as instruments of global governance.

At the same time, the analysis highlights the GSTC's role in shaping “sustainable tourism” as a normative concept, in line with the approach promoted by UNWTO since its inception and, more recently, by organizations such as UNESCO. This approach is consistent with the 2030 Agenda and is particularly valuable in a multidimensional and complex sector such as tourism, where clarifying the meaning of sustainability and its practical implications is essential. While the universal applicability of the GSTC Standards may explain their relatively general formulation, their wording should not suggest any dilution of internationally recognized and agreed rules. In this regard, the progressive incorporation of references to international legal norms in recent revisions represents a positive development, especially when contrasted with the near-total

absence of such references in earlier versions. Nonetheless, important gaps remain—for example, in relation to indigenous rights, human trafficking, and cultural heritage. Moreover, where concepts already form part of general international law—such as “decent work”—references to the relevant international norms should appear not only in performance indicators or supplementary guidelines, but in the core text of the Standards themselves, as they reflect internationally agreed minimum requirements. The aforementioned improvements would serve to mitigate the risk that GSTC standards may be used to substitute for, rather than supplement, robust public regulation, particularly in contexts where State capacity is weak.

More recently, the GSTC has contributed to structuring the fragmented landscape of sustainability standards and certification schemes, a function that is both necessary and timely. This role effectively delineates the global baseline for sustainability in tourism. However, beyond establishing a minimum common denominator, the GSTC’s recognition function could—and should—support a more context-sensitive understanding of sustainable tourism, one that incorporates adaptation to the specific environmental, social, and economic conditions of individual destinations. Ultimately, such an evolution will depend not only on the GSTC, but also on the capacity of destinations themselves to define and enforce more stringent or context-specific requirements.

Finally, it is noteworthy that a private governance body such as the GSTC has developed a mechanism intended to ensure the implementation of sustainable tourism standards. While the decentralization inherent in this system—through the accreditation of certification bodies—appears appropriate, two issues merit particular attention. First, the relatively small number of accredited bodies to date may, in addition to the concerns already noted, create conditions conducive to collusive practices and increased costs. Moreover, the relationship between GSTC accreditation and pre-existing certification bodies operating in various regions has not been addressed with sufficient transparency. Second, the commercialization of the GSTC’s assurance mechanism raises concerns. Although this reflects the predominantly private nature of actors in the tourism sector, measures may be needed to prevent the exclusion of small operators, thereby addressing potential issues of distributive justice. In this regard, efforts to promote sustainability in tourism destinations should also be reinforced through targeted use of UNDP funding and other development cooperation instruments. Indeed, the global public interest in sustainable development is closely intertwined with tourism activity in many regions, so equitable participation in and access to its supporting frameworks should be regarded as essential.

5. Concluding remarks

The GSTC is an example of transnational private governance that operates primarily through soft law. It contributes to defining sustainability objectives and diffusing sustainability as a relevant normative consideration across the tourism sector. Of particular interest is the GSTC’s differentiation of standards according to specific tourism activity segments. From a governance perspective, this means addressing tourism not as a homogeneous activity, but rather providing different categories of actors with more concrete indications of areas in which sustainability-related action is expected. At the same time, the GSTC framework establishes a common language and

baseline across different tourism activities, facilitating coordination and comparability. The preference for broadly applicable and easily harmonized requirements creates an inherent tension because it may encourage the adoption of standards that primarily operate as minimum thresholds rather than instruments capable of driving continuous and substantive improvement. The governance challenge is therefore ensuring that this baseline does not become the ceiling of sustainability ambition. In this regard, destinations should play a fundamental role. Unlike individual tourism businesses, destinations are sites where the cumulative effects of multiple tourism activities converge. Strengthening sustainability governance at the destination level should help achieve environmental and social objectives, thereby contributing to the long-term attractiveness and resilience of those destinations.

The analysis also raises broader questions about the GSTC's status as a multistakeholder governance arrangement. The regulatory relevance of private transnational standards requires more attention to be given to the institutional conditions under which these governance arrangements exercise normative authority. Organizations whose activities perform regulatory and control functions at the transnational level cannot rely indefinitely on the legal frameworks of individual states as the basis for their existence, authority, and accountability. Their transnational character requires corresponding consideration within international law. This underscores the necessity of developing an appropriate international legal framework that can recognize, structure, and subject to minimum safeguards those forms of governance whose effects extend beyond the jurisdiction of any single state. The same applies to the participation of non-state actors in global governance. They may certainly have the technical expertise, resources, or sector-specific knowledge required to address increasingly complex transnational problems. However, the necessity of their participation does not establish their entitlement to participate in global governance. Thus, the question of selection and representation becomes central to the legitimacy of multistakeholder governance. Criteria are needed to determine which actors are sufficiently representative, independent, transparent, and accountable to perform that role legitimately. These criteria should address the basis of an organization's representativeness, its membership and constituencies, potential conflicts of interest, funding and decision-making transparency, expertise, independence from regulated interests, and mechanisms through which affected stakeholders can participate and challenge decisions. Legitimacy also requires the participation of public authorities, who cannot disengage from transnational private governance, including in the tourism sector. This entails determining how public authorities should interact with private standard-setting organizations, as well as how these organizations should relate to international organizations and other forms of transnational governance.

Finally, the GSTC demonstrates the potential and limitations of multistakeholder transnational governance. Private and hybrid governance arrangements can provide expertise, coordination, flexibility, and the diffusion of sustainability principles across borders and sectors. However, expanding their normative and control functions creates a corresponding demand for legal and institutional safeguards. The central challenge is how to structure their participation in global governance within an appropriate legal framework so that transnational regulatory authority is exercised through transparent, accountable, and representative procedures.

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