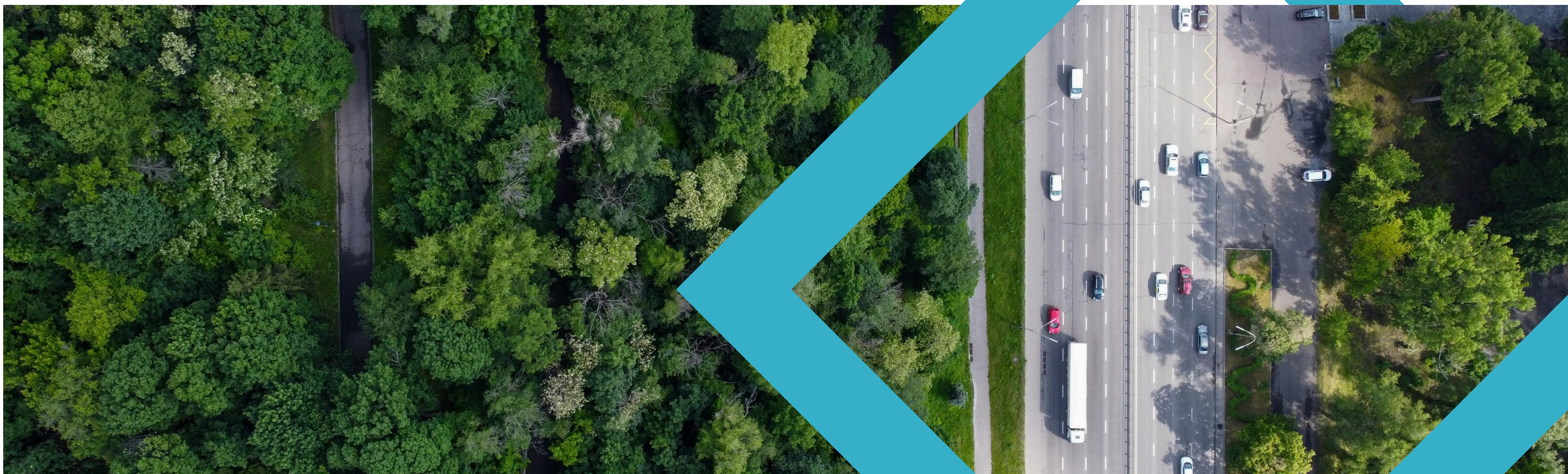


GLOBAL
**DESTINATION
SUSTAINABILITY
MOVEMENT**

**EUROPEAN
TRAVEL
COMMISSION**



A Destination's Guide to the New EU Sustainability Regulations

What tourism management organisations need to know

MAY 2025

Overview

This briefing paper explains three EU Green Deal Directives with significant impact on the tourism sector: the Corporate Sustainability Reporting Directive (CSRD), the Empowering Consumers for the Green Transition Directive (ECGTD), and the Green Claims Directive (GCD).

These regulations are crucial for improving corporate transparency and accountability regarding environmental and social impact. The CSRD mandates comprehensive sustainability reporting while the ECGTD provides consumers with better information about product durability and reparability and, in tandem with the GCD, eliminate misleading environmental claims around goods and services.

Together, these three Directives are designed to drive regional transformation towards sustainability. They encourage companies to enhance transparency and to consider the impacts of their supply chain's actions in every decision and action.

WHY READ THIS DOCUMENT?

This briefing document provides a detailed overview of the regulations, as well as practical guidance and best practices for compliance. With the help of this paper, you will:

- Understand the goals, scope, and key requirements of each of the three Directives.
- Explore the roles and responsibilities of Destination Management Organisations (DMOs), for example, Convention and Visitors Bureaus (CVBs), in honouring these Directives.
- Gain practical ideas on meeting compliance requirements.
- Understand the risks of non-compliance and the opportunities for those who adopt the sustainability practices outlined by the Directives.

WHO IS IT FOR?

This briefing is developed specifically for destination management professionals in Europe and beyond. The new EU legislation will affect businesses based in Europe, and also in the rest the world marketing to EU citizens.

REVISION

This is Edition 1 of the briefing. It will be updated when new, major developments are released by the European Commission, when the Directives are adopted, and as changes arise, particularly in light of current political uncertainty, which may influence their direction and implementation.

CONTRIBUTORS

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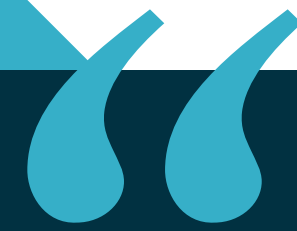
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Foreword by the European Travel Commission



Destination Management Organisations, whether at national, regional, or city level, sit at the heart of Europe's tourism ecosystem - not only as facilitators of travel, but as pioneers of its sustainable transformation. In their unique position, bridging local communities, public authorities, and the tourism industry, DMOs are well-placed to lead by example, guiding stakeholders through the complex transition toward more responsible and resilient tourism models.

With the adoption of new EU sustainability legislation, destinations face both opportunity and obligation. These regulatory developments are a welcome step forward in aligning the tourism sector with the European Green Deal and broader sustainability goals. Yet they also bring real implementation challenges - especially for destinations expected to support local actors in understanding, adapting to, and complying with these new frameworks.

At the European Travel Commission, we recognise our members' essential role in this transformation. Sustainability is not just a priority - it is a cornerstone of ETC's strategy, embedded in our long-term vision for the sector through our Chapter Earth network. This paper is part of that commitment: a practical resource to help destinations make sense of the changes ahead, anticipate their responsibilities, and continue leading the way.

We thank our members for their ongoing dedication to building a tourism sector that is fit for the future. Together, we can ensure that European destinations remain not only competitive, but also credible in their dedication to sustainable tourism."

Teodora Marinko
COO, European Travel Commission

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The European Green Deal is no longer just a sustainability roadmap - it's a bold and urgent mandate for transformation. It calls on businesses to lead with transparency, accountability, and innovation at their core.

Through the Directives outlined in this report, the European Commission is taking decisive action against greenwashing, ensuring sustainability claims are not just promises - but credible, verifiable, and actionable.

But as resistance grows, deadlines extend, and expectations rise, the policy landscape grows more complex - and with complexity comes opportunity.

This paper is a Call to Action. The most effective strategy is not to wait, but to lead - to pave the way with clarity, courage, and commitment.

Destinations must be at the forefront of this transformation, guided by:

- Regenerative practices
- Honest communication
- Measurable impact

These are not passing trends - they are the pillars of a resilient, future-fit visitor economy. One that restores ecosystems, creates real value for local communities, and rebuilds trust where it matters most.”

Guy Bigwood

CEO, GDS-Movement™

Introduction

The European Green Deal (Green Deal) represents a vast set of policies aiming to make the European Union (EU) climate-neutral by 2050. Central to this ambitious plan are measures to cut greenhouse gas emissions, invest in cutting-edge research and innovation, and restore and protect Europe's natural environment. Key components of the Green Deal include, amongst others, the Circular Economy Action Plan, the EU Biodiversity Strategy, and the Farm to Fork Strategy, each designed to ensure more sustainable practices across various sectors.

These initiatives are particularly relevant to tourism and events, a sector that drives economic growth significantly and can support social sustainability by preserving heritage, fostering cross-cultural understanding, and contributing to community development. However, tourism management and growth also present substantial social challenges, such as rising housing prices and the marginalisation of local communities, amongst others. Its environmental challenges include its carbon emissions, solid waste generation, air and water pollution, and degradation of natural habitats.

As a sector that relies heavily on the appeal of natural environments and cultural heritage as well as urban convenience and commercial business opportunity, tourism must address these sustainability challenges to help achieve the Green Deal's objectives. The European Commission's Transition Pathway for Tourism underscores this need by introducing a strategy that focuses on advancing sustainable tourism, promoting a greener transition, cultivating a stronger circular tourism economy, and enhancing resilience planning.

This guide aims to simplify complex legislation, making it more accessible to practitioners and helping them understand the opportunities and challenges ahead. With shifting geopolitical dynamics, navigating the EU's complex legislative landscape is more challenging than ever for practitioners outside of EU institutions.

The three Directives discussed in this paper, the Corporate Sustainability Reporting Directive (CSRD), the Empowering Consumers for the Green Transition Directive (ECGTD or Green Transition Directive), and the Green Claims Directive (GCD) are all elements of the Green Deal, and together, they aim to reduce greenwashing and increase transparency in company's public-facing communication, be they environmental claims, labels, or sustainability disclosures.

There is a great need for increased transparency. 2020 research by the European Commission finds that:

- 53% of the examined environmental claims gave vague, misleading, or unfounded information,
- 40% of the claims had no supporting evidence,
- and half of all green labels offered weak or non-existent verification.

In other words, more than half of companies doing business in the EU are 'greenwashing'.

Greenwashing is defined as the intentional or erroneous misrepresentation by organisations as more environmentally friendly than they are. It often involves highlighting sustainability initiatives while downplaying or hiding environmentally-damaging operations. While greenwashing is often unintentional, it can misinform and mislead consumers, creating confusion and distrust about companies' environmental practices.

The Corporate Sustainability Reporting Directive (CSRD)

What is measured can be better managed, and the CSRD is designed to enhance and standardise sustainability reporting across the EU. It provides standardised transparency and comparability of sustainability data, thereby improving the quality of information available to investors and other interested parties. This Directive expands the scope of the previous Non-Financial Reporting Directive (NFRD), which required large companies and publicly-listed SMEs to report on sustainability risks, impacts, and performance. The CSRD introduces new reporting requirements that must adhere to the European Sustainability Reporting Standards (ESRS), ensuring a consistent approach across the EU.

THE CSRD INTRODUCES SEVERAL KEY REQUIREMENTS:

- Companies must report on their environmental, social, and governance (ESG) impacts, based on double materiality - assessing how sustainability issues affect the company and the company's impact on people and the environment.
- Reports must undergo external assurance to verify the accuracy of the disclosed information.
- The digitalisation of reports is mandated to facilitate easy access and comparability of data across the EU. This means that reports disclosed under the CSRD must include digitally-readable metadata.

WHO MUST REPORT UNDER THE CSRD?

- A.** Large companies with more than 1 000 employees (and either a turnover above EUR 500M or a total balance sheet of EUR 25M).
- B.** Companies outside the EU that have a EUR 450M turnover generated in the EU or have a large subsidiary or a branch with net turnover exceeding EUR 50M.
- C.** Voluntary reporting for SMES for companies with fewer than 1 000 employees.

NEXT STEPS

The implementation timeline for the CSRD began in January 2024 with Part A and extends to 2029. This phased approach allows businesses time to adapt their reporting processes to meet the new Directive.

In February 2025, the European Commission proposed to limit the original scope of CSRD to only large companies, as reflected in this paper. As of publication of this document, the European Council and European Parliament are aligned with the Commission's proposal, but, at the time of publishing, have yet to formally endorse these changes.

The legislators have agreed to delay the entry into application of CSRD requirements for large companies (and listed SME's which were originally under the scope of CSRD) that have not yet started reporting by two years.

During this time, the Commission will revise the European Sustainability Reporting Standards (ESRS) to reduce the number of mandatory data points, prioritise quantitative over qualitative disclosures, and clarify materiality assessments to focus on significant impacts. These changes are expected to be adopted before the end of 2026.

WHAT DOES THIS MEAN FOR DMOS?

DMOs, depending on their size and structure, may fall under the requirements of this Directive if they are a large company or part of a large company that is pursuing CSRD reporting (more than 1000 employees, over EUR 500M annual turnover, or over EUR 25M in total assets).

Public, Not-for-Profit, or smaller DMOs, and those without significant EU market operations might not be immediately affected, but they could still face indirect impacts through their collaborations and partnerships with larger entities that need to comply. DMOs should evaluate their specific circumstances to determine the applicability of the CSRD and prepare accordingly.

See more: [Corporate Sustainability Reporting - European Commission](#)

What is the Voluntary Sustainability Reporting Standard for non-listed SMEs?

The CSRD includes voluntary ESG reporting for SMEs. The Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME) was developed by the EFRAG on behalf of the European Commission to create a simple and standardised framework for SMEs to report on ESG issues.

Although the reporting is voluntary, completing the VSME will create better opportunities for obtaining green financing, and enhancing reputation and risk management, amongst others.

There are two modules to comply with in the VSME; the basic and comprehensive.

DISCLOSURES FOR THE BASIC MODULE

Practices, policies, and future initiatives for transitioning towards a more sustainable economy.

BASIC METRICS - ENVIRONMENT

- Energy and greenhouse gas emissions (GHGs)
- Pollution of air, water, and soil
- Biodiversity
- Water
- Resource use, circular economy, and waste management

BASIC METRICS - SOCIAL

- Workforce - General characteristics
- Workforce - Health and Safety
- Workforce - Remuneration, collective bargaining, and training

BASIC METRICS - GOVERNANCE

- Convictions and fines for corruption and bribery

DISCLOSURES FOR THE COMPREHENSIVE MODULE

- Strategy: Business model and sustainability (related initiatives)
- Description of practices, policies, and future initiatives for transitioning towards a more sustainable economy.

COMPREHENSIVE MODULE - ENVIRONMENTAL

- GHG-reduction targets and climate transition
- Climate risks

COMPREHENSIVE MODULE - SOCIAL

- Workforce (General) - Additional characteristics
- Additional Own-workforce metric - Human rights policies and processes
- Severe negative human rights' incidents

COMPREHENSIVE MODULE - GOVERNANCE

- Revenues from certain sectors and exclusion from EU-reference benchmarks
- Gender diversity ratio in governance body

The Empowering Consumers for the Green Transition Directive (ECGTD)

The Empowering Consumers for the Green Transition Directive, also known as the Green Transition Directive, ECGTD, is part of the EU's Circular Economy Action Plan, and focuses on enabling consumers to make more informed choices through reliable and substantiated environmental claims. It aims to prevent misleading green claims and ensures that businesses provide transparent and accurate information about their products' environmental impacts.

KEY PROVISIONS OF THE DIRECTIVE INCLUDE:

- Mandating that companies substantiate any environmental claims using verified, transparent, and standardised methodologies. For instance, [Intrepid Travel shared the lessons learnt](#) from using vague language, and accounting for the full lifecycle of their services.
- Prohibiting vague and generic environmental claims and claims based on greenhouse gas-emission offsetting schemes. Such practices have already been found illegal and misleading by EU courts and advertising bodies, for example in the case of [KLM's 'Fly Responsibly' campaign](#).
- Banning the display of unreliable sustainability labels, ensuring that only verified labels are used. A great example of how to deal with this is [Booking.com's withdrawal of its 'Travel Sustainable' programme](#) in favour of prioritising third-party certifications.

This means that environmental labels must:

- Be based on a recognised certification scheme or established by a public authority,
- Include objective third-party monitoring, and
- Be compliant with international standards (e.g., ISO 17065).

Certification bodies and standards' owners now play a critical role. Schemes must deliver transparency, integrity, and actionable impact, positioning verified certifications as essential tools in legal compliance and brand credibility.

NEXT STEPS:

EU Member States are required to transpose the Directive into national law by 27 March 2026. The resulting legislation must take effect from 27 September 2026.

WHAT DOES THIS MEAN FOR DMOS?

The Directive's provisions apply to all companies that target European customers with their products or services, thus it is expected to have a significant impact on companies in the tourism sector, including DMOs, across the world.

The regulation requires privately-constituted DMOs (i.e. corporations) to substantiate any environmental claims they make about destinations.

DMOs that are part of public institutions or who are Not-for-Profit are not directly implicated in this legislation. However, it is expected that there will be increasing focus and policy from public institutions, and lobby from business for all DMOs to improve their messaging.

See more: [Sustainable consumption - European Commission](#)



The Empowering Consumers for the Green Transition Directive (ECGTD)

WHAT IS A GENERIC OR VAGUE CLAIM?

The terms 'environmentally-friendly', 'eco-friendly', 'green', 'nature's friend', 'ecological', 'environmentally-correct', 'climate-friendly', 'gentle on the environment', 'carbon-friendly', 'energy-efficient', 'biodegradable', 'bio-based' or similar, which suggest or create the impression of excellent environmental performance without proof are generic or vague.

Source: (recital 9, Empowering Consumers Directive).



The Green Claims Directive (GCD)

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The Green Claims Directive requires companies to have clear, objective, publicly-available, and demonstrable commitments set out in a detailed and realistic implementation plan that is regularly verified by an independent and accredited third-party expert. The Directive sets forth minimum requirements for substantiating, verifying, and communicating such claims, with the objective of strengthening consumer trust, making it a preventative measure against greenwashing.

THE GOALS OF THE DIRECTIVE ARE TO:

- Avoid overstatements,
- Make claims clearer, and
- Make claims specific.

TO ACHIEVE THIS, THE GCD WILL PROVIDE:

- Clear criteria on how companies should substantiate their environmental claims and labels, requiring science-based evidence to back these claims.
- Specific requirements for comparative claims.
- Requirements for claims and labels to be vetted and validated by an accredited labelling scheme prior to publishing.
- New rules on the governance of environmental labelling schemes to ensure they are solid, unobscured, and reliable.
- Requirements on the communication of environmental claims, emphasising transparency and accuracy in communication.

In essence, the GCD further complements the ECGTD with additional, specific criteria and requirements. The scope of the GCD and the ECGTD are the same, targeting all business-to-consumer (B2C) companies that communicate with EU citizens. Micro-enterprises with fewer than 10 people and whose annual turnover and/or annual balance sheet total does not exceed €2 million are exempt at launch, unless they choose to comply. The proposed GCD would apply to these small companies 42 months after it enters into force.

See more: [Green claims - European Commission](#)



Some Examples Using the Sins of Greenwashing Framework:

- 01 **FIBBING:** making claims that are false (e.g., “We recycle 100% of our waste” – when it is not true)
- 02 **VAGUENESS:** using terms that are too broad to mean anything (e.g., ‘climate-friendly’ or ‘eco-friendly’)
- 03 **LESSER EVILS:** using an eco-label on an otherwise-environmentally-harmful product (e.g., “zero-waste cruise ships”)
- 04 **IRRELEVANCE:** claiming an environmental achievement that is already required by regulation (e.g., “our fridges are CFC-free”)
- 05 **HIDDEN TRADE-OFF:** suggesting a product is sustainable based on a single attribute (e.g., “Thanks to emissions’ offsetting, our hotel is 100% sustainable.”)
- 06 **NO PROOF:** making an unsubstantiated claim (e.g., “We are a sustainable destination.”)
- 07 **WORSHIPPING FALSE LABELS:** creating your own eco-label or using a non-standardised second-party label (e.g., hotels creating their own eco-labels and doing their own internal verification.)

(Source: [TerraChoice: The Sins of Greenwashing: Home and Family Edition, 2010](#))

NEXT STEPS:

The Green Claims Directive is currently in the final stages of the legislative process. The European Commission, European Parliament, and the European Council are currently negotiating the final document. The Directive could be adopted by late 2025 or early 2026, with Member States typically required to apply it within two years of adoption.

Summary of the Legislation

DIRECTIVE

THINK OF IT AS...

The Corporate Sustainability Reporting Directive (CSRD)

Helps companies to collect and focus on sustainability information that matters – to understand risks and potential profit loss and allow them to play a part in financing the green transition.

The Empowering Consumers for the Green Transitions Directive (ECGTD)

A consumer protection update: it bans misleading environmental claims, vague language, and unverifiable labels, making clear what not to do, targeting those that are not supported by clear, objective, publicly-available, and verifiable commitments.

The Green Claims Directive (GCD)

A technical rulebook: sets out exactly how to substantiate, verify, and communicate green claims, legally and transparently.

Next Steps for Destination Management Organisations

DMOs play a crucial role in meeting the new EU sustainability regulations. By fostering partnerships with local enterprises and supply chains, DMOs can facilitate a cohesive approach to sustainability, enhancing the overall effectiveness of their efforts.

To start, DMOs need to analyse the status quo in their country to understand which regulations apply to them, how national regulations align with the EU regulations, and how they and their affiliates will be impacted. This could involve their direct compliance, them providing necessary information to organisations in their value chain, or them supporting their partners and stakeholders to achieve compliance.

CORPORATE SUSTAINABILITY REPORTING DIRECTIVE

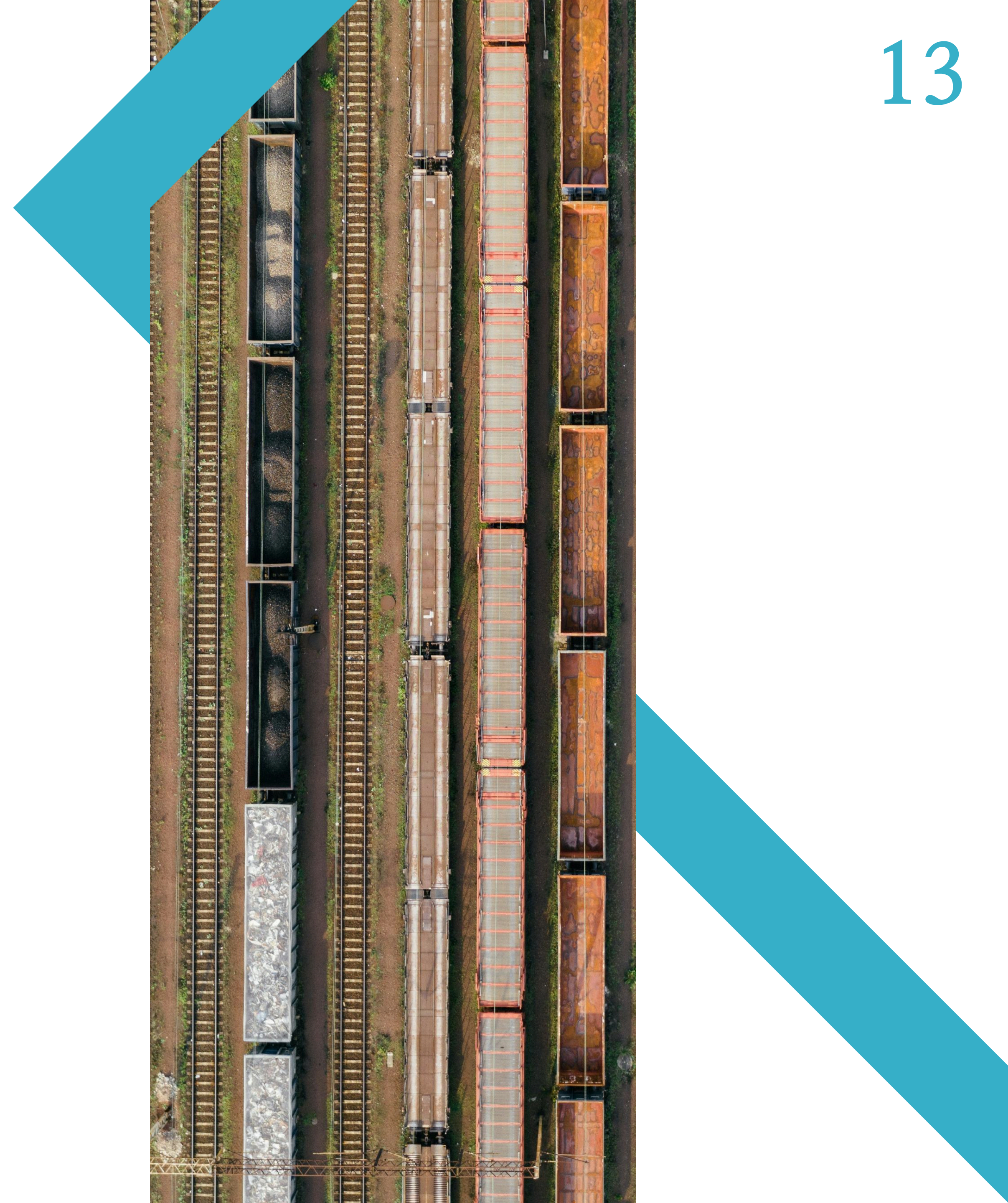
For DMOs that are structured as corporations and wish to voluntarily comply with the CSRD, the focus should be on preparing for reporting by:

- Following EFRAG-developed VSME reporting.
- Developing a comprehensive sustainability strategy.
- Creating governance structures that support sustainability through an organisation's management of decisions and information.
- Setting up reporting processes and tools to collect the necessary data, ideally using sustainability data management software.

Public and Not-for-Profit DMOs do not fall under the scope of the regulation. However, going through this process will allow you to champion the implementation of the directive and leverage the opportunities presented by the CSRD.

To support your ecosystem, we recommend DMOs take the following actions:

- 1. Increase industry compliance.** Inform and educate companies in your business ecosystem about the upcoming regulations, assessing which companies might be directly or indirectly affected.
- 2. Identify funding or grant opportunities** to support businesses in the industry with reporting requirements. In the EU, many countries already provide financial support to accelerate compliance. Non-EU-member countries may provide similar support programmes.
- 3. Share best practices and knowledge:** Create a community of action for local tourism businesses and suppliers so they can exchange knowledge, experience, resources, and promote businesses that make progress. Invite sustainability and communications experts from local businesses and public institutions to participate and consult.



Certifications – What Happens Next?

As the EU enforces stricter sustainability regulations through the ECGTD and the GCD, certification schemes are under growing scrutiny. Only certifications that are science-based, independently accredited, and governed with full transparency will retain legal credibility and market relevance. Those that fall short of this risk being excluded from marketing authorisations, public communications, and regulatory recognition.

To comply, certification programmes must meet rigorous criteria:

- Be accredited by a recognised international scheme or one established by a public authority.
- Include robust, third-party monitoring and verification.
- Ensure that the certification body adheres to international standards for conformity assessment, such as ISO/IEC 17065.

In practice, this means certification bodies may develop standards and provide training or consulting on them, but may not carry out verification activities unless their auditing and certification functions are, legally and operationally, fully independent.

Self-declared labels, such as in-house 'green badges' or hotel chain-created eco-labels, will no longer be acceptable under EU law.

At present, formal recognition by the European Commission has not been established for frameworks such as GSTC, TSCA, and, potentially, Travalyst. Their role in the evolving regulatory landscape still needs to be clarified, particularly in light of the expected developments by 2026.

Preparing for ECGTD and GCD

We recommend DMOs take these practical next steps:

EVALUATE

- Explore how the existing and pending legislation affects you and its potential risks.
- Map your destination's existing environmental claims against the new requirements.
- Evaluate which of your claims will need to be adjusted and/or better substantiated to meet the regulation.

MAP

- Develop a compliance plan and policy to avoid greenwashing.
- Guide internal and agency communications' teams with examples and strategies.

CERTIFY

- Begin to implement an accredited sustainability certification for your DMO and destination to achieve compliance.

EDUCATE

- Educate tourism and event businesses about new needs in your supply chain and industry.
- Collaborate with partners to share learning and knowledge.

SUPPORT

- Identify funding or grant opportunities to support visitor economy businesses with the regulatory requirements, and promote them.
- Raise awareness and support enterprises to apply for funding, certification, and capacity development.

MONITOR

- Regularly check and audit your organisation's processes and claims to ensure ongoing compliance.

Key Considerations

DMOs must fully understand the scope and objectives of the new regulations to ensure compliance. This involves integrating sustainability regulatory requirements into core operations and strategies. Significant investments in time, skills, expertise, and finances will be required to align with the regulations. Effective compliance will also require you to engage with a broad range of interested parties, including local businesses, government agencies, and tourists, and residents. Leveraging government networks, EU funding, and industry partnerships can facilitate this process. This is especially important as the GCD is not yet ratified, and its compliance requirements could change.

RISKS

Adapting to new regulations may require significant changes in operations, including training, data collection, reporting, marketing , communications, and stakeholder engagement. Failing to comply with the Directives can lead to bans, fines, legal proceedings, loss of business opportunities, and reputational damage.

Companies may be fined up to 4% of their annual turnover for non-compliance with the Directives' requirements.

By understanding these impacts and taking proactive steps to comply, DMOs can turn regulatory challenges into opportunities for growth and sustainability leadership .

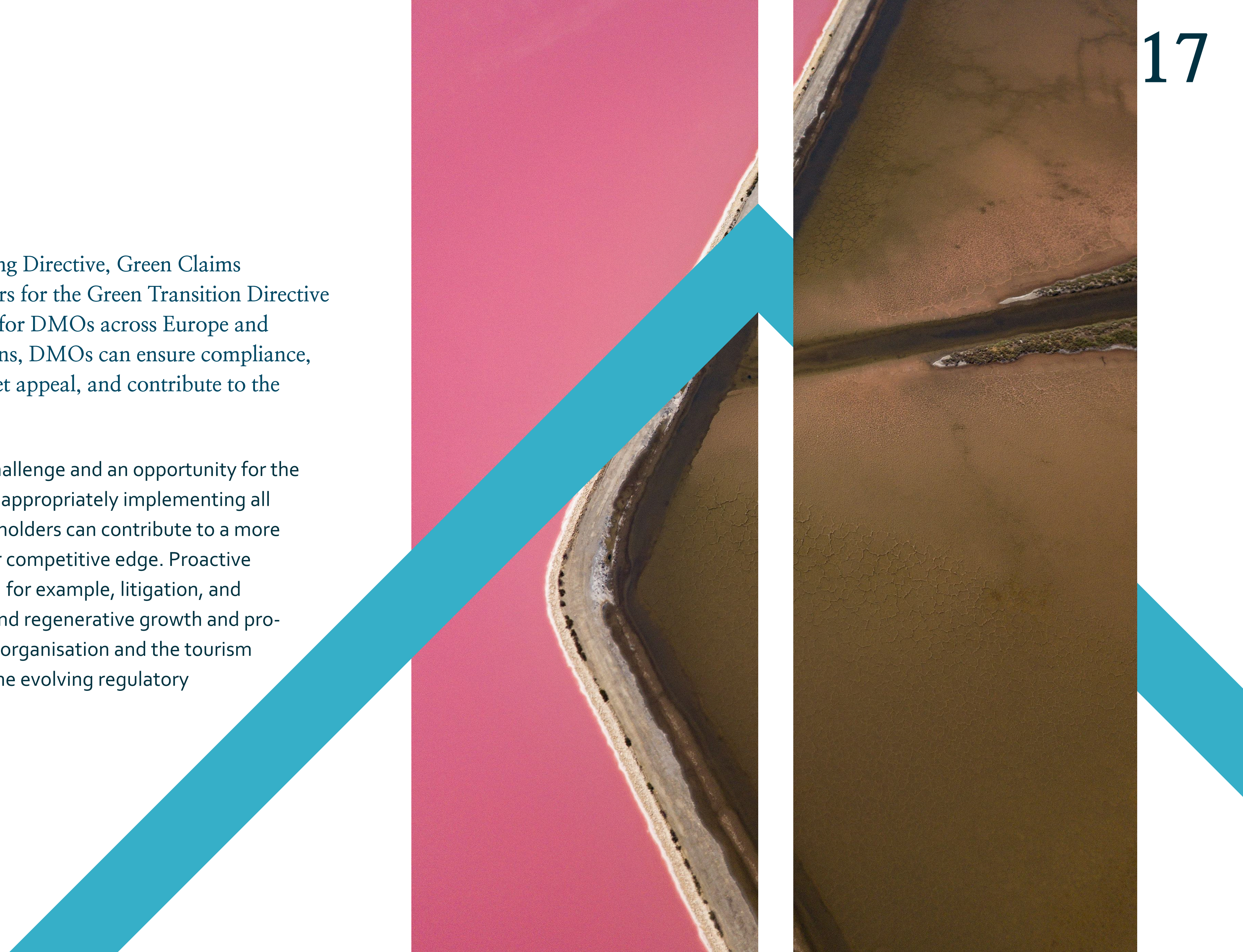
COMPLIANCE OPPORTUNITIES
Meeting the demands of the new regulations is a chance to:

1. Enhance brand reputation through transparency and commitment to sustainability.
2. Build trust with clients, customers, travellers, partners, and the local community.
3. Attract more eco-conscious travellers, creating new market opportunities.
4. Improve access to green financing options and grants.

Conclusion

The Corporate Sustainability Reporting Directive, Green Claims Directive, and Empowering Consumers for the Green Transition Directive present a transformative opportunity for DMOs across Europe and beyond. By embracing these regulations, DMOs can ensure compliance, drive innovation, enhance their market appeal, and contribute to the broader goals of the EU Green Deal.

Adapting to these, however, is both a challenge and an opportunity for the tourism industry. By understanding and appropriately implementing all three Directives, DMOs and other stakeholders can contribute to a more sustainable future while enhancing their competitive edge. Proactive compliance will mitigate high-cost risks, for example, litigation, and unlock new avenues for more resilient and regenerative growth and proactive reputation building, ensuring the organisation and the tourism sector remain robust and aligned with the evolving regulatory landscape.





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How the GDS–Movement Can Support You

The GDS–Movement is here to support your journey through a variety of bespoke services.

GDS-ACADEMY

The in-house Communications and Storytelling for Regeneration Masterclass introduces inspiring storytelling examples from destinations and brands that integrate sustainability into their communications narrative to reach and engage diverse audiences.

In the Masterclass, you'll dive into the legislation presented in this paper, and explore behaviour-change methodologies and storytelling tools. We will help you to connect deeply with your residents, visitors, and businesses, and inspire them without falling into the trap of 'greenwashing' or 'green hushing'.

You'll gain new knowledge and practical skills to create more engaging, purposeful communications that better represent and catalyse the environmental, economic, and social regeneration of your destination.

Get more information about the Masterclass [here](#).

GDS-CONSULTING

Our communication and policy experts specialise in helping you evaluate and map your existing sustainability claims, ensuring alignment with regulations and best practices. We can guide you to develop a compliance roadmap and robust policies to prevent greenwashing and enhance your sustainability communications and reporting.

Through tailored, immersive training for your internal and agency teams, we build capacity and expertise, fostering more effective communication across your destination. Our workshops and facilitated knowledge-exchange-sessions empower stakeholders with the skills and insights needed to communicate sustainability with confidence.

Additionally, we offer guidance on developing destination-wide certification strategies, helping DMOs to select the best partners, engage interested parties, co-create implementation pathways, and better communicate their impacts.

For more information, visit www.gds.earth or email info@gds.earth