



Almaty-Bishkek Economic Corridor Support **Proposed Joint Accommodation Classification System for** **Kazakhstan and the Kyrgyz Republic**

November 2021

Authors:

Dr. Dimitris Koutoulas

Accommodation Classification Expert/Team Leader

Karlygash Altayeva

Kazakh Tourism Expert

Nurzada Eralieva

Kyrgyz Tourism Expert

Disclaimer: The views expressed in this publication are those of the authors and do not necessarily reflect the views and policies of the Asian Development Bank (ADB) or its Board of Governors or the governments they represent. ADB does not guarantee the accuracy of the data included in this publication and accepts no responsibility for any consequence of their use. The mention of specific companies or products of manufacturers does not imply that they are endorsed or recommended by ADB in preference to others of a similar nature that are not mentioned.

Table of Contents

Abbreviations	3
Executive Summary	4
Introduction	5
PART I: The Present Situation	9
1. The Current Accommodation Classification Systems of Kazakhstan and the Kyrgyz Republic	9
1.1 The Current Accommodation Classification System of Kazakhstan	10
1.2 The Current Accommodation Classification System of the Kyrgyz Republic	24
1.3 Comparison of the Current Accommodation Classification Systems in Kazakhstan and the Kyrgyz Republic.....	30
2. Stakeholders' Views of the Current ACS and Their Expectations from the New ACS	31
2.1 Stakeholder feedback regarding the current and new ACS of Kazakhstan	33
2.2 Stakeholder feedback regarding the current and new ACS of the Kyrgyz Republic.....	36
3. International Trends Affecting Accommodation Classification Systems	39
3.1 Key Characteristics of Hotel Classification Systems	42
3.2 Classification of Other Accommodation Types	45
PART II: The New Joint ACS of Kazakhstan and the Kyrgyz Republic	52
4. Guiding Principles for a New Joint ACS	52
4.1 Geographic Scope of the New Joint ACS	52
4.2 Users and Beneficiaries of the New Joint ACS	52
4.3 Operator of the New Joint ACS	53
4.4 Key Characteristics and Values of the New Joint ACS.....	56
5. Proposed Accommodation Typology	58
5.1 Accommodation Types	58
5.2 Room Types.....	60
6. Classification Criteria	61
6.1 About stars and other symbols.....	62
6.2 Types of classification criteria.....	63
6.3 Main categories of classification criteria.....	64
7. Main Classification System Components	66
7.1 Administering applications submitted by accommodation businesses	66
7.2 Inspectors, onsite inspections, and classification costs	67
7.3 Re-evaluation of classification assessments.....	69
7.4 Committees and code of conduct.....	70
7.5 Marketing and communicating the ACS.....	70
7.6 Supporting accommodation businesses	71
7.7 Management structure of each National ACS Operator	71
8. Action Plan for the Implementation of the Joint ACS	72
8.1 Planning for the transition to the new joint ACS.....	72
8.2 Indicative implementation schedule per the action plan	74
Annex A1. Key Findings from an International Survey among Hotel Classification Specialists	75
Annex A2. The Accommodation Sector of Kazakhstan and the Kyrgyz Republic	83
Annex A3. Recommendations Concerning Potential Legislative Changes	92
Annex A4. Proposed Classification criteria	96

Abbreviations

ABEC	The Almaty-Bishkek Economic Corridor
ACS	Accommodation Classification System
ADB	Asian Development Bank
B&B	Bed & Breakfast
CAREC	Central Asia Regional Economic Cooperation Program
DMO	Destination Marketing/Management Organization
HOTREC	Confederation of National Associations of Hotels, Restaurants, Cafés and Similar Establishments in the European Union and European Economic Area
HSU	Hotelstars Union
HVAC	Heating, ventilation, and air conditioning
KGS	Kyrgyz Som
KTA	Kazakhstan Tourism Association
KZT	Kazakhstan Tenge
OTA	Online Travel Agency
UNWTO	World Tourism Organization
WP	Work package

Executive Summary

The subject of the present report is supporting the development of a new Joint Accommodation Classification System (ACS) for Kazakhstan and the Kyrgyz Republic. The classification systems in both countries have similar challenges: they are based on outdated criteria and no longer reflect the needs and preferences of guests. Additionally, they have never been fully functional, participation by accommodation businesses is extremely low, and hotel stars are being widely used by hotels without official accreditation.

The proposed new joint ACS is based on a detailed assessment of the current systems as well as on the review of international best practices. The expected outcomes of introducing the new joint ACS within the two countries is to raise the quality standards of the hospitality sector; empower accommodation businesses; improve visitor satisfaction levels; and foment the competitiveness of Kazakhstan and the Kyrgyz Republic as tourist destinations.

The new system is aimed at both travellers and accommodation establishments. Besides those two main user categories, the new joint ACS will also serve the travel trade, investors, construction companies, equipment suppliers, international hotel chains and all involved government agencies. A stand-out feature of the joint ACS is its flexible design regularly updated classification criteria and adaptation of the criteria to local conditions.

The present report includes detailed recommendations concerning the setup and operation of the new joint ACS. Setting up a new legal entity in each country just for operating the new joint ACS is not recommended due to cost and administrative reasons. Instead, an existing tourism-related government agency that is already responsible for ACS matters should take over the role of National ACS Operator. The desired public-private cooperation will be achieved through the three committees that will support the Operator.

The new system will be voluntary, which makes it necessary to separate the licensing of an accommodation business (such as a hotel or a campsite) from the classification process. At the same time, the use of hotel stars and other official classification symbols shall be legally restricted and authorized by each country's National ACS Operator only.

Each accommodation type has its own set of classification criteria. Criteria are distinguished between mandatory and optional criteria, the latter yielding several points. Each accommodation business must fulfill the respective minimum mandatory criteria and collect a certain number of points to achieve classification within a specific category.

The present report details the main components of the new classification system. Guidelines about inspectors, the inspection process and cost calculations are presented, and the recommended frequency of reevaluation, as well as marketing and communicating needs for the new system, is discussed. An efficient management structure is also described, with particular emphasis placed on three proposed committees that are to support the joint ACS.

The present report concludes with an action plan for the launch and implementation of the joint ACS. The action plan comprises 16 activities over an initial twelve-month period for transitioning from the present to the new joint ACS in a swift and effective way. These actions shall be implemented both at the national and transnational level, as part of the ensuing cooperation between the two countries.

Introduction

Background and Objectives of the Project

1. The Almaty–Bishkek Economic Corridor (ABEC) is the pilot economic corridor under the Central Asia Regional Economic Cooperation (CAREC) Program. As part of TA-9487 REG: Almaty-Bishkek Economic Corridor Support, UNWTO has assessed and reviewed the Kazakh and Kyrgyz accommodation sector, primarily within the ABEC with the aim of focusing on harmonizing the regulatory, legal, and institutional framework, and developing common accommodation criteria and standards for both countries.
2. The present ACS is an integral part of the **ABEC travel bubble** currently being established by the two countries. Also motivated by the current COVID-19 pandemic, key components of the travel bubble are trust, broad stakeholder cooperation mechanisms, and common sector regulations and enforcement methods. Together with ADB, UNWTO is working on two central travel bubble components: firstly, common COVID-19 health and safety protocols and measures, and, secondly, the present assessment of the Kazakh and Kyrgyz accommodation sector that is to lead to the adoption of a common Accommodation Classification System (ACS). Ultimately, both activities aim to strengthen country-specific regulations through the adoption of international best-practices and recommendations, guide public and private tourism stakeholders in adapting business and service operations to the new realities of COVID-19, and improve coordination and exchange amongst tourism stakeholders, thus fulfilling a prime requisite for the successful development of an ABEC travel bubble.
3. The present ACS Report focuses on providing partners with a way forward by containing a detailed overview of the ongoing situation in the two countries, plus a series of recommendations and guidelines – also based on international best practices – as to how to achieve a high level of legal, regulatory, and institutional consonance, as well as common accommodation standards and practices. A common approach in terms of standards, protocols and institutional arrangements will work towards the development of ABEC as a travel bubble by providing private tourism stakeholders of both countries with a stable and common regulatory framework, and the official authorities with improved mechanisms for coordination and exchange. The development of common accommodation criteria and standards will also advance long-term competitiveness by improving the overall travel experience and service input.

About accommodation classification systems

4. According to UNWTO¹, classification systems can be divided into those that evaluate objective criteria only, and those that evaluate both objective and subjective criteria, with further specificities grouped according to the five different approaches listed below. Within each approach, the systems can be either statutory or voluntary to varying degrees.
5. Historically, the first application of classification systems in the hospitality sector was aimed at hotels. The most common type of hotel classifications are star ratings ranging from one to five stars. Currently being applied in many countries around the world, one-star facilities denote basic facilities and standards of comfort, while five stars denote luxury in facilities and services. Over the years, classification systems were introduced for other types of accommodation as well, including camp sites, hostels, guesthouses, holiday apartments, cruise ships, and similar establishments. Herein, there exist great variations between countries regarding classification criteria and methods.

¹ UNWTO (2015). Hotel Classification Systems: Recurrence of criteria in 4- and 5-star hotels. Madrid: UNWTO

6. Usually, criteria fulfilment is checked by auditors or inspectors through site inspections. Depending on the nature of the classification body (government agency, industry association, private company etc.), inspections may be carried out by the body's own employees or by accredited third-party auditors. Some classification systems also resort to self-assessment, either as an alternative to site inspections or complementary to these.
7. The benefits of classification systems apply to both travellers and accommodation businesses. Classification is foremost about quality assurance and provides benchmarks and guidelines to both parties. Guests should be able to rely on an official classification system when booking an accommodation. They should feel assured that they will find a minimum of facilities and services at the selected accommodation and should be able to roughly assess the value for money component. On the other hand, accommodation providers receive very clear guidelines about the minimum standards they are expected to provide regarding facilities and services.
8. Official national classification systems were mostly based on facilities; however, recent system updates are increasingly emphasizing services. Such a development has also been influenced by the growing impact of guest review sites such as TripAdvisor, with some official classification systems – as in the case of Abu Dhabi – using guest ratings as an input into their classification algorithm.
9. Another beneficiary of accommodation classification systems is the travel trade, i.e., the sector comprising businesses organizing and selling trips, such as tour operators, travel agencies, online travel agencies (OTAs), professional congress organizers, and similar actors. Such systems provide the needed transparency, so that resellers of accommodation services can compare available options and recommend the most fitting accommodation to their customers.
10. Globalization is strongly affecting the reality and perceptions of official classification systems. Manifestations include the proliferation of guest rating platforms such as TripAdvisor, but also the increased expansion of international hotel brands, with each brand representing its own – and, in most cases, well communicated – set of quality standards. Travellers may not know what to expect from a five-star hotel, but they may be very familiar with the brand standards of prestigious hotel chains such as Four Seasons and Ritz-Carlton. Such sectoral developments have been considered in the Report.
11. While there is a lively debate about hotel star standards and the future of hotel ratings across the world, a similar international discussion about classification of other forms of accommodation is missing. International comparative and benchmarking studies of campsites, bed & breakfast inns, holiday apartments and other types of accommodation have been very limited both in number and in scope. Most, if not all, of the analyses of these accommodation sectors have a national focus.
12. As is the case with hotels, other accommodation types are being classified in various categories. However, no classification form has prevailed internationally. These classifications come in many different shapes, such as *stars* (e.g., up to five stars for bed & breakfast properties in Ireland, up to five stars for German campsites), *keys* (e.g., up to four keys for holiday apartments in Greece) or *fireplaces* (e.g., up to four “fireplaces” by Logis de France).

Reference documents on international best-practices

13. The present project benefits from the existing literature on accommodation classification and has utilized available international studies on this topic. Most benchmark studies have

focused **mostly on hotels and to a lesser degree on other types of accommodation**. Their analyses, however, of hotel classification systems provide useful insight into the practicalities of classifying any type of accommodation.

14. Following the WTO/IH&RA landmark report from the year 2004, subsequent studies by UNWTO and other organizations have been focusing on the current challenges of classification and especially on the growing impact of guest review sites on consumer decisions. The following studies and resources provided an adequate international context for the development of the joint ACS for Kazakhstan and the Kyrgyz Republic:
 - WTO & IH&RA (2004). The Joint WTO & IH&RA Study on Hotel Classification. Madrid: WTO
 - UNWTO (2014). Online Guest Reviews and Hotel Classification Systems: An Integrated Approach. Madrid: UNWTO
 - UNWTO (2015). Hotel Classification Systems: Recurrence of criteria in 4- and 5-stars hotels. Madrid: UNWTO
 - Hotelstars Union (2020). Criteria 2020-2025. Brussels: HSU

Reference documents on tourism in the ABEC region

15. A series of documents and resources produced as part of the Almaty–Bishkek Economic Corridor (ABEC) initiative provided the proper context for understanding and analysing the accommodation sector of Kazakhstan and the Kyrgyz Republic. Documents worth highlighting include:
 - Almaty–Bishkek Economic Corridor Tourism Master Plan ([download](#))
 - ABEC Tourism Flow Analysis ([download](#))
 - Legal and Institutional Frameworks ([download](#))
 - Demand Forecasts and Scenarios ([download](#))

Methodological Approach

16. As part of the project, strong emphasis was placed on the collection of correct data on accommodation classification in Kazakhstan and the Kyrgyz Republic. This allowed the project team to gain a good understanding of the present situation of the accommodation sector – and accommodation classification, in particular – in the two countries, and the position of all involved stakeholders on this topic. It has been of utmost importance for the project team to properly understand the sentiments of stakeholders towards the existing ACS and their expectations from the new joint system to be introduced by the two countries.
17. For this purpose, the project team collected both primary and secondary data by employing the following research methods:
 - **Secondary data collection:** All available resources on the topics indicated below have been collected and analysed:
 - i. Official documents about the present ACS and related regulations in the two countries covering topics such as accommodation typology, classification criteria as well as implementation, monitoring and enforcement of the present ACS.
 - ii. Official tourism statistics for Kazakhstan and the Kyrgyz Republic.
 - iii. COVID-19, public-health and other hygiene and safety measures implemented by the accommodation sector in Kazakhstan and the Kyrgyz Republic.
 - iv. Other available resources on the above topics. Several documents available in English have provided valuable insights into the tourism economy and the

accommodation sector of Kazakhstan and the Kyrgyz Republic. These documents include:

- ADB (2019). Almaty–Bishkek Economic Corridor Tourism Master Plan.
 - UNWTO (2019). The Development of a Hotel Classification scheme in the Kyrgyz Republic: Mission Report.
- v. Review of international best practices by utilizing the following sources:
- Comparative analyses of classification systems in several countries, which have been conducted by industry bodies, consultants, or academic researchers (those analyses focus almost exclusively on the hotel sector and hotel star rating, in particular).
 - Official national classification systems from several countries covering a variety of accommodation types beyond hotels such as holiday apartments, camp sites, bed & breakfast, hostels etc.

- **Primary data collection:** To properly understand the sentiments towards the existing ACS, as well as the needs and expectations from the new joint ACS, a wide range of stakeholders were invited to participate in project consultations:
 - i. **Stakeholder Interviews:** An initial round of direct exchange with all four stakeholder groups, as described below, were conducted based on a series of virtual, qualitative semi-structured interviews.
 - ii. **Stakeholder Questionnaire:** Some stakeholders participated in the consultation by submitting their positions in writing based on a questionnaire that was prepared by the project team.

18. To cover the full spectrum of potential stakeholders, the following grouping was undertaken:

- **Stakeholder Group A:** Public-sector organizations (incl. national, regional, and local authorities) that are involved in tourism development as well as in licensing and controlling accommodation providers.
- **Stakeholder Group B:** Industry associations of the hospitality sector.
- **Stakeholder Group C:** Individual businesses from the hospitality sector covering all types of accommodation such as hotels (incl. international hotel brands and boutique hotels), motels, hostels, guesthouses, resorts, yurts, camps etc.
- **Stakeholder Group D:** Industry associations and key businesses from other tourism-related sectors (e.g., tour operators and travel agencies).

19. All stakeholders were given the opportunity to provide their feedback on the present draft ACS report before report finalization.

PART I: The Present Situation

1. The Current Accommodation Classification Systems of Kazakhstan and the Kyrgyz Republic

20. The present chapter includes a review of the current accommodation classification systems (ACS) as they are being implemented in Kazakhstan and the Kyrgyz Republic.
21. Until date, participation in these systems has been very limited. Of the 1,287 hotels operating in the **Kyrgyz Republic** in 2020, only six (6) hotels have been accredited based on the current classification system of accommodation facilities dating back to 1995. According to information provided by the Center for Standardization under the Ministry of Economy and Finance of the Kyrgyz Republic, the certificates of these six hotels were outdated by the time of the writing of this report, meaning that **currently no Kyrgyz hotel has a valid classification** according to the country's official ACS.
22. Of all 2,086 hotels operating in **Kazakhstan** in 2020, only 150 have been classified according to the country's star categories (see Table 1-1). This shows that there is a **very low adoption rate of the existing ACS** amongst the hotels of the country. Most classified hotels belong to the higher categories (between three and five stars), whereas the number of hotels classified with one or two stars is negligible.
23. There has been a steady decline in the number and share of classified hotels in Kazakhstan, as shown in Table 1-1. In 2016, 278 hotels – 16% of the country's total – featured a star rating, with the share of classified hotels dropping to just 7% in 2020. Five-star hotels were the only segment of classified hotels to increase over this five-year period, whereas hotels in the three-, two- and one-star segment decreased dramatically.

Table 1-1: Number of classified and non-classified hotels in Kazakhstan between 2016 and 2020 (Source: Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan)

	2016	2017	2018	2019	2020
5* hotels	20	22	23	24	26
4* hotels	85	87	79	71	64
3* hotels	138	132	120	85	49
2* hotels	20	18	24	15	7
1* hotels	15	14	14	10	4
All classified hotels with star ratings	278	273	260	205	150
Non-classified hotels	1441	1578	1753	1890	1936
All hotels	1719	1851	2013	2095	2086
<i>(Share of hotels with star ratings)</i>	<i>(16%)</i>	<i>(15%)</i>	<i>(13%)</i>	<i>(10%)</i>	<i>(7%)</i>
Other accommodation	1035	1136	1309	1497	1428
All accommodation establishments	2754	2987	3322	3592	3514

1.1 The Current Accommodation Classification System of Kazakhstan

24. The current accommodation classification system is regulated in accordance with **the Tourist Accommodation Classification Rules**, approved by the *Order of the Minister of tourism and Sports*² dated **11 November 2008** №01-08/200³. The main objectives, organizational structure, minimum requirements, and procedures for the determination of accommodation category (points-based assessment) are defined in the *Rules*. The purpose of the classification is to ensure the development of tourist complexes, determine the standard equipment of tourist accommodation, ensure service standards and the stability of the quality of services provided at tourist accommodation.
25. Norms and requirements of the *Rules* have never been revised and updated since 2008. The *Rules* were developed based on the Interstate Standard 28681.4-95 «*Tourist & excursion service. Classification for hotels*»⁴. The Interstate Standard was adopted on **26 April 1995** by the States⁵ that have signed the Agreement on conducting coordinated policy in the field of standardization, metrology, and certification.
26. **On 24 November 2004**, the Interstate Standard 28681.4-95 was put into effect directly as a State standard of the Republic of Kazakhstan by the Order of the Committee of standardization, metrology and certification of the Ministry of Industry and Trade (№393).⁶

Table 1.1-1: Key elements of the regulations from the years 2004 and 2008 in Kazakhstan

Interstate Standard 28681.4-95 « <i>Tourist & excursion service. Classification for hotels</i> » (2004)	Tourist Accommodation Classification Rules (2008)
The standard establishes the classification of hotels (motels) of various organizational and legal forms with a capacity of at least 10 rooms.	The Rules determine main objectives, organizational structure, minimum requirements, and procedures for the determination of accommodation category.
The classification of hotels by category is based on a set of requirements for: - material and technical support; - the range and quality of services provided; - the level of service. Hotels are classified in five categories, motels in four.	The <i>characteristics</i> of tourist accommodation are considered, which make it possible to carry out certification for one of the categories.
General requirements for hotels Requirements for hotels of any category Appendix A. Requirements for hotels of various categories 1. Building and adjacent territory; 2. Technical equipment; 3. Rooms; 4. Technical equipment; 5. Equipping with furniture & tools;	1. General provisions 2. Procedure for the classification 3. Preliminary assessment and decision making on the application 4. Conducting a classification assessment Appendix 1. Application Appendix 2. Questionnaire Appendix 3. Table 1. Requirements for tourist accommodation of various categories

² Nowadays the authorized body in tourism is the Tourism Industry Committee of the Ministry of Culture and Sports.

³ Available at <https://adilet.zan.kz/rus/docs/V080005367>

⁴ Available at https://www.egfntd.kz/rus/tv/64046.html?sw_gr=-1&sw_str=%D0%93%D0%9E%D0%A1%D0%A2%2028681.4-95&sw_sec=21.

⁵ Azerbaijan, Armenia, Belarus, Kazakhstan, Kyrgyz Republic, Moldova, Russian Federation, Turkmenistan, Uzbekistan, Ukraine.

⁶ Available at https://adilet.zan.kz/rus/docs/Z010000211_#z0

<ol style="list-style-type: none"> 6. Inventory and items of sanitary and hygienic equipment of the room; 7. Sanitary facilities for general use; 8. Public spaces; 9. Premises for the provision of catering services; 10. Services; 11. Catering services; 12. Requirements for personnel and their training. 	<ol style="list-style-type: none"> 1. Building and adjacent territory; 2. Technical equipment; 3. Rooms; 4. Technical equipment; 5. Sanitary facilities of general use; 6. Public areas; 7. Premises for the provision of catering services; 8. Services; 9. Catering services; 10. Requirements for personnel and their training. <p>Appendix 4. Table 2. Criteria for the points-based assessment of accommodation of various categories with more than 50 rooms</p> <p>Appendix 5. Table 3. Criteria for the points-based assessment of accommodation of various categories with less 50 rooms</p> <p>Appendix 6. Table 4. Criteria for the points-based assessment of motels, campsites, tourist camps, guest houses, rest houses, boarding houses and other similar accommodation</p> <p>Appendix 7. Table 5. Requirements for rooms of tourist accommodation of various categories</p> <p>Appendix 8. Table 6. Criteria for the points-based assessment of rooms of tourist accommodation of various categories</p> <p>Appendix 9. Footnotes to «Requirements for tourist accommodation of various categories»</p> <p>Appendix 10. Footnotes to "Requirements for rooms of tourist accommodation of various categories"</p>
--	---

Accommodation types

27. According to (1) the Law on Tourism Activity in the Republic of Kazakhstan (№ 211 dated 13 June 2001; hereinafter called the **main Law**) and (2) the Tourist Accommodation Classification Rules, **accommodation for tourists is defined as** «hotels, motels, campsites, tourist camps, guest houses, rest houses, boarding houses and other buildings and facilities used for the accommodation of tourists and their service».
28. The Tourist Accommodation Classification Rules are aimed at hotels ranging between one and five stars. There are **no minimum requirements** for other types of accommodation.
29. According to the country's National Statistics⁷, the accommodation data **by category** is structured into 3 groups: (1) hotels rated from 1 to 5 stars, (2) hotels without any category, and (3) other types of accommodation. The accommodation data **by types** is divided into the following 12 types (definitions are given according to the National Statistical observation form "Report on the activities of accommodation

⁷ Available at <https://stat.gov.kz/official/industry/22/statistic/5>

(1) гостиница с рестораном; (2) гостиница без ресторана; (3) мотель; (4) пансионат отдыха; (5) детский лагерь; (6) одноэтажные бунгало, сельские домики (шале), коттеджи, небольшие домики и квартиры; (7) трейлерные парки, развлекательные городки, охотничьи и рыболовные угодья для краткосрочного размещения; (8) кемпинг; (9) туристская база; (10) дом отдыха; (11) туристский лагерь; (12) другие виды жилья, из них хостел.

establishments”):

- **Hotel with restaurant.**
- **Hotel without restaurant.**
- **Motel** (hotel for auto-tourists located on the motorway or which is part of the tourist center).
- **Recreation boarding house** (an accommodation with minimal amenities, seasonal operation, located in a recreational area, which provides conditions for rest).
- **Kid's camp** (seasonal accommodation focused on children recreation).
- **One-story bungalows, country houses (chalets), cottages, small houses, and apartments** (separate isolated spaces, consisting of fully furnished rooms for living, eating, and sleeping, including kitchenware or fully equipped kitchens).
- **Trailer parks, entertainment towns, hunting and fishing grounds for short-term accommodation.**
- **Camping** (a place for auto-tourists with an equipped parking lot, toilets, places for tents or light houses).
- **Tourist base** (accommodation that provides tourists with planned routes, accommodation, meals, in addition to tourist and excursion, cultural, household, and physical culture and health services).
- **Rest House** (accommodation located in a recreational area, which provides conditions for recreation with the provision of health and prophylactic services in a regulated manner).
- **Tourist camp** (divided into temporary or stationary depending on purpose). Depending on the tourist contingent (unorganized, including family, tourists, schoolchildren, participants in sports trips, auto-tourists), tourist camps are subdivided into climbing camps, base camps, bivouacs, camp sites, and tourist and health camps).
- **Other types of accommodation, including hostels** (temporary accommodation rented to visitors in single or shared rooms or dormitories).

Legal definitions of accommodation types

30. The types of accommodation classification that currently exist are **not legally defined** neither in the main Law nor in the Tourist Accommodation Classification Rules. The **State Standard of the Republic of Kazakhstan BS EN ISO 18513:2003 «Tourism services. Hotels and other types of tourism accommodation. Terminology, IDT»** defines terms used in the tourism industry in relation to the various types of tourism accommodation and other related services. It is identical to British Standard ISO 18513:2003 «*Tourism services. Hotels and other types of tourism accommodation. Terminology*».
31. The following **28 types of accommodation** are defined in the Standard:
 - i. **Hotel** – «*an institution (establishment) with a reception, services and additional amenities (complexes), where accommodation and, in most cases, meals are available*»;
 - ii. **Guest house** – «*an institution (establishment), often located in a rural area, with food and drink offered, where accommodation is also provided*»;
 - iii. **[Bed & Breakfast]**⁸ - «*private house where guests are accommodated and in most cases breakfast is provided*»;

⁸ According to this Standard formulating standard tourism definitions is a difficult task not the least because of cultural differences. Some terms and concepts have not been included within the

- iv. **[Pension]**⁹ - «an institution (*establishment*) that provides accommodation, as a rule, for more than one night, where meals are calculated mainly for guests staying»;
- v. **Aparthotel / Apartment Hotel** – «a hotel where accommodation is provided in studios or apartments»;
- vi. **Apartment complex / Residence** – «an institution where accommodation is provided in a studio or apartment»;
- vii. **Gite rural** – «a furnished accommodation for family with self-catering equipment, usually located in a rural home, village or outside of it»;
- viii. **Youth Hostel** – «an institution (*establishment*), usually operated by a non-profit organization, where an accommodation is provided with limited catering and/or self-catering, and other facilities, services, programs and activities are foreseen as a basis for non-formal education and recreational purposes primarily for young people»;
- ix. **Holiday camp/Holiday centre/Holiday village** – «a recreational facility, typically providing accommodation in chalets, bungalows or caravans and providing on-site entertainment, shops and restaurants»;
- x. **Camping site/Caravan park/Holiday park/Touring camp/Touring park** – «a designated area with a bathroom that provides any of the following forms of accommodation: tents, caravans, campervans, chalets, bungalows, with and without entertainment and sports facilities, shops and restaurants»;
- xi. **Motel** – «a hotel with parking just steps away, designed to lure car enthusiasts»;
- xii. **Spa Hotel** – «a hotel with its own wellness treatments, which is located in a resort with mineral springs»;
- xiii. ...¹⁰ - «a private house in a rural area where accommodation (housing) is provided»;
- xiv. **Farm house** – «an accommodation with an operating farm»;
- xv. ...¹¹ - «an accommodation on a working farm, where food is prepared mainly from agricultural products»;
- xvi. **Mountain refuge** – «an isolated type of accommodation, located in mountainous areas, controlled or uncontrolled, providing collectible numbers»;
- xvii. **Chalet / Bungalow** – «a separate accommodation equipped for household self-service»;
- xviii. **All-suite hotel** – «a hotel where accommodation is provided only in suites»;
- xix. ...¹² - «a hotel in an urban condition when accommodation is provided for a long time»;
- xx. **Canal barge** – «a residential boat with domestic amenities for inland cruises»;
- xxi. **Camper van / Motor home / Caravanette** – «self-propelled motorized road vehicle equipped with bedroom and household appliances»;
- xxii. **Caravan** – «travelling accommodation on a wheeled trailer that can be transported»;
- xxiii. **Caravan holiday home / Holiday caravan / Static caravan / Mobile home** – «a residential trailer mostly stationary, but can be moved, placed on the field and sold as a second home or rented out for the holidays with accommodation and household appliances»;
- xxiv. **Folding caravan** – «a residential trailer that can be dismantled and folded for ease of transport and is towed by a road vehicle, providing accommodation and household appliances»;
- xxv. **Tent** – «a type of fabric stowage that can be dismantled and folded down for easy transport»;

standard because they were unknown in one or more member state, or incapable of being accurately translated, or described, by one or two of the three languages used in the standard.

No name. Just given as "...". Defined in German as "*Privatunterkunft*" and in French "*chambres d'hôtes*".

⁹ No name. Just given as "...". Defined in German as "*pension*" & in French "*pension de famille*".

¹⁰ No name. Just given as "...". Defined in French "*chambre d'hôte rurale*".

¹¹ No name. Just given as "...". Defined in French "*ferme auberge*".

¹² No name. Just given as "...". Defined in German "*boardinghouse*".

- xxvi. **Touring caravan / Tourer** – «*a car designed to be towed behind a road vehicle, provides accommodation and household appliances*»;
- xxvii. **Trailer tent** – «*a tent mounted on a trailer and designed to be towed behind a road vehicle*»;
- xxviii. “...”¹³ - «*an establishment for the accommodation of tourists with children who are staying on vacation or treatment*».

Hostel

- 32. Initially the definition of hostel is given in the **National Standard of the Republic of Kazakhstan 2847-2016 «Accommodation services. General requirements for hostels»**¹⁴ adopted by the Order of the Chairman of the Committee of Technical Regulation and Metrology of the Ministry of Investment and Development of Kazakhstan dated 25 November 2015 №300-од as «*an economical accommodation facility intended for temporary accommodation, mainly for low-budget tourism, with rooms of various capacities and bathrooms, usually outside the room, as well as premises (zones, places) for guests to communicate*»¹⁵.
- 33. According to this Standard, hostels can be in a separate building or occupy part of a building (floor, entrance), an apartment or several apartments in one building (on one or several different floors).
- 34. However, after receiving numerous complaints from residents of multi-apartment residential buildings, in 2019, the Government initiated the definition of hostels in the Law on housing relations¹⁶ (16 April 1997 №94) as «*a non-residential premise in a multi-apartment residential building, having a separate entrance group, or a separate building (part of the building), intended and used for temporary residence (stay) of individuals, meeting the established construction, sanitary, ecological, fire-prevention and other mandatory norms and rules*»¹⁷. Accordingly, nowadays hostels cannot be in a residential building that shares a common entrance with residents.

Guest House

- 35. According to the National Standard 2851-2016 «Tourist and excursion service. Guest houses. General requirements»,¹⁸ a guest house is defined as «*a small, specialized place (facility) of accommodation (often family), located in the aul¹⁹ area or in small towns, providing guests with temporary accommodation services, as well as additional services for organizing leisure, catering, excursions and others*»²⁰.

¹³ No name. Just given as “...”. Defined in German as “*Kindererholungsheim*” & in French “*maison d’enfants*”.

¹⁴ Available at http://shop.ksm.kz/index.php?dispatch=products.view&product_id=250971

¹⁵ In Russian «*Экономичное средство размещения, предназначенное для временного проживания, преимущественно для малобюджетного туризма, имеющее номера/комнаты различной вместимости и санузлы, как правило за пределами номера/комнаты, а также помещения (зоны, места) для общения гостей*».

¹⁶ Available at <https://adilet.zan.kz/eng/docs/Z970000094>

¹⁷ In Russian «*хостел – нежилое помещение в многоквартирном жилом доме, имеющее отдельную входную группу, либо отдельно стоящее здание (часть здания), предназначенное и используемое для временного проживания (пребывания) физических лиц, отвечающее установленным строительным, санитарным, экологическим, противопожарным и другим обязательным нормам и правилам;*».

¹⁸ Available at: https://www.egfntd.kz/rus/tv/387150.html?sw_gr=-1&sw_str=&sw_sec=24

¹⁹ “aul” is given in Kazakh, and means “a village”

²⁰ In Russian: «*Малое специализированное место (средство) размещения (часто семейное), расположенное в аульной местности или в малых городах, предоставляющее гостям*

36. Guest houses in auls may include private households, mini-hotels, condominiums or rooms of individual homeowners, houses of a fisherman or hunter, and other small accommodation facilities suitable for short-term accommodation and catering for guests.

Yurts

37. The following two definitions have been included in the National Standard 2850-2016 «Tourist and excursion service. Reception and accommodation of tourists in yurts»²¹:
- Yurt as “a portable felted frame dwelling among Turkic and Mongolian nomads”.
 - Yurt town/camp as “a specialized recreation center, place of reception and accommodation of tourists in ethnic style, aimed at immersion and acquaintance with the history and cultural characteristics of nomads”.

Classification categories

38. The Tourist Accommodation Classification Rules classify hotels and other accommodation into one- to five-star categories.

Classification criteria per accommodation type

39. The current Rules of Accommodation Classification define the requirements for:
- Building and surrounding area.
 - Technical equipment (emergency lighting, power supply, water supply, air conditioning, broadcasting, elevator, telephone communication).
 - Rooms.
 - Technical equipment (security alarm, soundproofing, heating, air-cooling/conditioning).
 - Sanitary facilities of general use.
 - Public areas (hall area, wardrobe, conference hall, business centre, sports & fitness centre, swimming pool, medical office, shops).
 - Premises for the provision of catering services.
 - Services (reception service, handing correspondence to guests, porter, luggage tray, daily cleaning of the room, washing ironing, etc.).
 - Catering services.
 - Requirements for personnel and their training.
40. Even though the requirements for (1) equipping with furniture and inventory (bed, carpets, wardrobe, table, armchair, etc.) and (2) inventory and items of sanitary and hygienic equipment of the room **are specified in the Interstate Standard 28681.4-95 «Tourist & excursion service. Classification for hotels»**, they were **not included** in the Rules.
41. Moreover, some requirements of the Interstate Standard were changed in the Rules. For example, the bathroom area (minimum size in square meter (sq.m)) was underestimated.
- The Interstate Standard: for 1* , 2* & 3* - 3,8 sq.m; 4* - 4,0 sq.m; 5* - 5,0 sq.m.
 - The Rules: for 1* - 1,75 sq.m; for 2* & 3* - 2,5 sq.m; for 4* & 5* - 3,8 sq.m.

услуги временного проживания, а также дополнительные услуги по организации досуга, питания, экскурсий и другие».

²¹ Available at: https://www.egfntd.kz/rus/tv/387148.html?sw_gr=-1&sw_str=2850-2016&sw_sec=0

42. Furthermore, the **criteria for the points-based assessment** of accommodation of different categories – both those with up to 50 rooms and those exceeding 50 rooms – are defined in the Rules (for example, points for quality and condition: excellent, good, satisfactory).
43. The minimum requirements for motels, camping, tourist camps, guest houses, rest houses, boarding houses and other buildings and facilities used for the accommodation of tourists are **not defined in the Rules**. However, the **criteria of points-based assessment** for these types of accommodation are provided.
44. The requirements for rooms of each category (from 1 to 5 stars) are defined in the Rules. Rooms are divided into following types:
 - Room of the highest category (suite, apartment, lux, studio);
 - Room of each category (from 1 to 5 stars).

Guest houses

45. The minimum requirements for guest houses are defined in the National Standard 2851-2016 «Tourist and excursion service. Guest houses. General requirements».²² The Standard has been *developed by the Kazakhstan Association of Hotels and Restaurants in 2016* and was approved by the Order of the Committee of Standardization, Metrology and Certification of the Ministry of Investment and Development (№ 300-од dated 25 November 2016).
46. The **general requirements** (mandatory & recommended) are defined in the Standard as follows:
 - Territory (site) requirements.
 - Tourist information of the guest house.
 - Equipment of guest houses.
 - Interior of the guest house.
 - Rooms of the guest house.
47. Guest house services must adhere to the following criteria:
 - Safety of the services provided.
 - Transport accessibility.
 - Completeness, sufficiency, reliability of information about the guest house and the services provided.
 - Readiness of the staff (owners, managers) of the guest house to provide services.
48. The guest house must provide the following basic services:
 - Guest reception operating at least 8 hours a day.
 - Catering services or the provision of means for self-catering.
 - Periodic sanitary cleaning of living rooms, including the arrival area of guests.
 - Bed linen change – at least once every 5 days and upon arrival of new guests.
 - Change of towels at least once every 3 days and upon arrival of new guests.
49. Moreover, recommended additional services are given in the Standard.

²² Available at: https://www.egfntd.kz/rus/tv/387150.html?sw_gr=-1&sw_str=&sw_sec=24

50. The **safety requirements** of the guest house should cover the following risk factors:

- Fire hazard/fire safety.
- Sanitary and hygienic indicators.
- Risk of injury assessment.

51. Concerning the requirements from **guest house staff**, the Kazakhstan Tourism Association (KTA) conducts training for guest house owners and certifies guest houses according to the abovementioned Standard (see picture below). According to the certification results, guest houses are awarded **three levels of quality**: golden (5 tulips), silver (3 tulips) and bronze (1 tulip). However, **KTA is not accredited** by the National Centre for Accreditation since the accreditation is voluntary and applicable costs are high.



52. The KTA maintains its Register of certified guest houses at www.hospitality-kazakhstan.kz²³. Nowadays there are **only 38 certified guest houses** in just two regions²⁴:

- Almaty region – 34 guest houses:
 - Gold: 12
 - Silver: 17
 - Bronze: 5
- East Kazakhstan region – 4 guest houses:
 - Gold: 1
 - Silver: -
 - Bronze: 3

Hostels

53. According to the National Standard of the Republic of Kazakhstan 2847-2016 «Accommodation services. General requirements for hostels»,²⁵ the following aspects have been defined:

²³ In 2005, the Kazakhstan Tourism Association (KTA), with the financial support from USAID and the Eurasia Foundation, launched a Community Based Tourism project, which opened 11 communities. More info available at: <https://hospitality-kazakhstan.kz/o-nas/>

²⁴ Available at: <https://hospitality-kazakhstan.kz/gostevye-doma-respubliki-kazahstan/>

²⁵ Available at http://shop.ksm.kz/index.php?dispatch=products.view&product_id=250971

- General requirements.
- The hostel operator is obliged to establish the rules of residence. Sample rules of residence are given in the official document's appendix.
- Requirements for the adjacent territory for hostels located in detached buildings.
- Requirements for buildings, technical equipment, and equipment of hostel premises.
- Information support requirements.
- Services provided in hostels.
- Security requirements.
- Environmental protection requirements.
- Requirements for the staff of hostels.

54. Hostels are divided into the following **types** according to guest capacity:

- Mini hostels (up to 25 residents);
- Small hostels (from 25 up to 50 residents);
- Large hostels (more than 50 residents).

Yurts

55. The National Standard 2850-2016 «Tourist and excursion service. Reception and accommodation of tourists in yurts» specifies general requirements for yurts and services provided in yurt camps.

- General requirements. Two types of yurts are defined: six-rope and eight-rope. The main dimensions and parameters of the yurt, depending on the type, are given in the Standard.
- Technical requirements.
- Completeness.
- Territory (site) requirements.
- Tourist information of yurts/yurt camps.
- Equipment of yurts/yurt camps.
- Interior of the yurts.
- Requirements for services of yurts/yurt camps.
- Security requirements of the yurt.
- Requirements for the staff of the yurt.

56. It should be noted that the standards of guest houses and yurts are mostly identical.

Organization operating the ACS

57. According to the Tourist Accommodation Classification Rules, the issuance, registration of certificates, as well as control over compliance with the classification requirements, are carried out by «**the body for confirmation of conformity**». This organization:

- is a legal entity accredited by the accreditation body;²⁶
- carries out work within the scope of accreditation;
- should be independent of service providers; and
- have expert-auditors.

²⁶ An accreditation body is a legal entity determined on a competitive basis, carrying out accreditation activities and being a member of international accreditation organizations.

58. The accreditation body is the **National Centre for Accreditation LLP (NCA)** of the Committee of Technical Regulation and Metrology of the Ministry of Trade and Integration of the Republic of Kazakhstan²⁷.
59. The certificates of accreditation issued by the NCA are valid throughout the territory of the Republic of Kazakhstan and have a validity of **five** years. The certificate of accreditation is subject to registration in the **register** of subjects of accreditation.²⁸
60. Companies are to be accredited in compliance with the requirements of GOST ISO / IEC 17065-2013 «*Conformity assessment. Requirements for bodies for certification of products, processes and services*».²⁹
61. In the register of NCA³⁰, as of today (5 June 2021), there are 11 subsidiaries³¹ of the **National Centre for Expertise and Certification JSC** defined as a body for confirmation of conformity of hotel services:
- Privatized in September 2005;³²
 - More than 1400 employers, including 373 expert auditors for the confirmation of the conformity of products, services, management systems.
62. Thus, **only one company is operating in the classification of hotels and there is no competition from the private sector.**

Mandatory or voluntary character of the classification

63. The accreditation is being implemented on a voluntary basis. It is carried out following the initiative of the applicant on a contractual basis.
64. The classification is independent from the process of getting a license as an accommodation business.

Steps to be taken by an accommodation establishment for getting classified

65. There is one step involved³³: submission of the **application** and the **questionnaire to the body for confirmation of conformity**, in accordance with Appendices No. 1 and 2 of the Tourist Accommodation Classification Rules. The submission also includes **documents** confirming compliance with the classification requirements:
- For a legal entity: notarized copies of the Charter, and certificate of state registration as a legal entity;
 - For an individual – a copy of an identity document;

²⁷ Defined by the Government Decree dated 27 August 2008 №773 «On the determination of the accreditation body». Available at: https://adilet.zan.kz/rus/docs/P080000773_#z5

²⁸ The Law of the Republic of Kazakhstan dated 5 July 2008 No. 61-IV «On Accreditation in the Field of Conformity Assessment». Available at: <https://adilet.zan.kz/rus/docs/Z080000061>

²⁹ Available at: https://www.egfntd.kz/rus/tv/363218.html?sw_gr=-1&sw_str=&sw_sec=0

³⁰ Searched by a key word «*tourist accommodation*». The register of accreditation subjects. Available at: http://88.204.198.180/index.php?do=web_search

³¹ In nine regions and two cities: Akmola, Aktobe, Atyrau, East Kazakhstan, West Kazakhstan, Karaganda, Kostanay, Mangystau, Pavlodar, Almaty city & Nur-Sultan city.

³² «*Certification passed into private hands*» Source: https://expert.ru/kazakhstan/2005/18/18ka-kbiznov1_56669/

³³ In accordance with the Decree of the Government of the Republic of Kazakhstan dated February 4, 2008, No. 90 «*On approval of technical regulations «Conformity confirmation procedures*». Available at: https://adilet.zan.kz/rus/docs/P080000090_#z116

- Necessary to ensure the functioning of tourist accommodation – a lease agreement or document on the ownership of buildings and equipment, as well as contracts with qualified employees.

Steps taken by the ACS operators for completing the classification process of an accommodation business

66. The body for confirmation of conformity considers the application and the submitted documents within **30 calendar days** from the date of its receipt and informs the applicant about the results of the consideration. The total period for the classification should not exceed one month from the date of filing the application.
67. After receiving the application from the accommodation operators (*Step 1*), the following actions need to be taken:
- Step 2: Preliminary assessment and decision-making on the application.
 - Step 3: Selection of a certification scheme.
 - Step 4: Execution of an agreement between the body for confirmation of conformity and the applicant.
 - Step 5: Classification check by expert-auditors with a site inspection.
 - Step 6: Analysis of the results, decision-making on the issuance or the refusal to issue a certificate.
 - Step 7: Registration of the issued certificates in the State Register.
 - Step 8: Certificate delivery to the applicant.
 - Step 9: Inspection control over a certified service.
68. Each subsequent procedure is performed based on the positive outcome of the previous one.
69. Based on the results of the inspection, the body for confirmation of conformity may *suspend or cancel the validity of the Certificate*, if the provided service does not comply with the requirements of regulatory documents, as well as in the following cases:
- Changes in the regulatory document for the provision of services.
 - Changes in the technological process for the provision of services.
 - Changes in the methods of control, testing (inspections), and quality assurance system, especially if changes cause non-compliance of services and conditions of service with requirements established during certification.
 - In case of termination of the activities of the service provider.
70. The **validity period** of the certificate is established by the body for confirmation of conformity by considering the service certification scheme.

Compliance with regulations

71. The body for confirmation of conformity confirms the compliance of the certified services with the requirements established in the following **regulatory documents**³⁴:
- *The Tourist Accommodation Classification Rules* (Order of the Minister of tourism and Sports dated 11 November 2008 №01-08/200);

³⁴ National Standard 3.7-2015 «Procedure for confirmation of the conformity of tourist and excursion services and services for providing tourist accommodation». Available at: https://www.eqfntd.kz/rus/tv/386384.html?sw_gr=-1&sw_str=CT%20PK%203.7-2015&sw_sec=0

- Interstate Standard 28681.4-95 «Tourist & excursion service. Classification for hotels»;
- National Standard 1141-2002 «Tourist and excursion service. Accommodation facilities. Classification and general technical requirements»³⁵.

72. Other normative documents include:

- National Standard 3.7-2015 «*The procedure for confirming the conformity of tourist and excursion services and services for the provision of tourist accommodation*»³⁶;
- Interstate Standard 28681.3-95 «Tourist and excursion service. Requirements for ensuring the safety of tourists and excursionists»³⁷;
- National Standard 1195-2004 «Tourist and excursion service. Requirements for ensuring the safety of tourists and excursionists»³⁸;
- Construction Norm 3.02-07-2014 «Public buildings and equipment»³⁹;
- Set of rules 3.02-107-2014 «Public buildings and equipment»⁴⁰;
- Sanitary Rules "Sanitary and Epidemiological Requirements for Public Catering Facilities" (Order of the Minister of Health dated 23 April 2018 №186)⁴¹;
- Construction Norm 2.04-104-2012«Natural and artificial lighting»⁴²;
- Set of rules 2.04-01-2011 «Natural and artificial lighting»⁴³;
- Interstate Standard 12.1.036-81 «Occupational safety standards system. Noise. Acceptable levels in residential and public buildings»⁴⁴;
- Interstate Standard 12.1.004-91 «Occupational safety standards system. Fire safety. General requirements»⁴⁵.

73. Table 1.1-2 presents the service certification schemes and their application in accordance with the Decree of the Government of the Republic of Kazakhstan dated February 4, 2008, No. 90 «On approval of technical regulations – Conformity confirmation procedures»⁴⁶:

74. The schemes used for certification of services are determined by the applicant. For tourist accommodation, Schemes 4 and 5 are being used. **Scheme 4** provides for the certification of the enterprise, which includes verification of:

- State of material and technical base.
- Sanitary and hygienic conditions.
- Range and quality of services, along with targeted and additional services.
- Clarity and timeliness of service.
- Quality of service (ethics of communication, comfort, aesthetics, consideration of consumer requests, etc.).
- Professional skills of service personnel.

³⁵ Available at: <https://www.egfntd.kz/rus/tv/80519.html>

³⁶ Available at: <https://www.egfntd.kz/rus/tv/386384.html>

³⁷ Available at: https://www.egfntd.kz/rus/tv/302988.html?sw_gr=-1&sw_str=%D0%BA%D1%83%D1%80%D1%81&sw_sec=0

³⁸ Available at: https://www.egfntd.kz/rus/tv/80573.html?sw_gr=-1&sw_str=&sw_sec=24

³⁹ Available at: https://www.egfntd.kz/rus/page/NTD_KDS_SNRK

⁴⁰ Available at: https://www.egfntd.kz/rus/page/NTD_KDS_SPRK

⁴¹ Available at: <https://adilet.zan.kz/rus/docs/V1800017179>

⁴² Available at: https://www.egfntd.kz/rus/page/NTD_KDS_SNRK

⁴³ Available at: https://www.egfntd.kz/rus/page/NTD_KDS_SPRK

⁴⁴ Available at: https://www.egfntd.kz/rus/tv/304031.html?sw_gr=-1&sw_str=%D0%93%D0%9E%D0%A1%D0%A2%2012.1.036-81&sw_sec=21

⁴⁵ Available at: https://www.egfntd.kz/rus/tv/304012.html?sw_gr=-1&sw_str=&sw_sec=0

⁴⁶ Available at: https://adilet.zan.kz/rus/docs/P080000090_#z116

Table 1.1-2: Service certification schemes and their application in accordance with Decree of the Government of the Republic of Kazakhstan No. 90 from 2008

Scheme №	Performance assessment	Service Delivery Process Assessment	Enterprise certification	Management system certification	Selective check of the result of services	Inspection control
1	+				+	Checking the result of services*
2		+		+		Monitoring the stability of the service delivery process
3					+	Selective check of the result of services
4			+		+	Selective check of the result of services
5				+		Monitoring the stability of the service delivery process

75. Scheme 4 is recommended for the certification of hotels, restaurants, hairdressing salons, cinemas, etc. The assessment of the enterprise may result in the assignment of a category (category, class, star).
76. **Scheme 5** provides for the certification of the management system and subsequent inspection control. Certification of the management system is carried out by the body for confirming the conformity of services, with the involvement of expert auditors on management systems in accordance with the normative documents of the State system of technical regulation of the Republic of Kazakhstan. It can be used for certification of *all* types of services.

Timeframe of reassessing classified accommodation

77. In the Tourist Accommodation Classification Rules, the reassessment process is not defined. Inspection control of the certified service in accordance with the Certification Scheme shall be carried out during the entire period of validity of the Certificate, and **at least once a year** in the form of periodic and unscheduled inspections. This is considered necessary to confirm that the services continue to meet the established requirements.
78. The frequency of inspection control is determined by the body for confirmation of conformity that has issued the Certificate. **Unscheduled inspections** can be carried out in cases of complaints about the product quality by consumers, trade organizations, as well as bodies exercising state control over the object for which the Certificate was issued.

Electronic infrastructure of the classification process

79. The National Centre for Accreditation's (<http://www.nca.kz/>) utilizes the following online services:

- **Electronic accreditation service** of subjects in the field of conformity assessment designed to automate the business processes of accreditation. Available at: <https://techreg.goldau.kz/ru/acc/info> developed as part of the digital business platform www.goldau.kz
- **Register of subjects of accreditation**: search for subjects of accreditation by name, certificate number, registration date and expiration date of the certificate, type of activity, scope of accreditation. Available at: http://88.204.198.180/index.php?do=web_search
- **Register of issued certificates of conformity** and declarations of conformity of the Republic of Kazakhstan. Available at: <http://rep.nca.kz/kaz1/>

Communicating the ACS

80. No activity has been undertaken for communicating the classification system and its criteria to the travel market.

Unauthorized use of hotel stars

81. The unauthorised use of hotel stars is neither covered nor sanctioned in the current legislation.

82. Nowadays only 7% of the country's hotels have been officially classified according to the Register of Issued Certificates of Conformity (see <http://rep.nca.kz/kaz1/>). However, no negative consequences have been reported by non-certified hotels that are using hotel stars on social media, OTA platforms and their own website.

The strengths and weaknesses of the current ACS

83. Some key conclusions about the present ACS of Kazakhstan have been summarized in Table 1.1-3.

Table 1.1-3: Strength and weaknesses of the current accommodation classification system (ACS) of Kazakhstan

Strengths of the current ACS	Weaknesses of the current ACS
<ul style="list-style-type: none"> • Ease of starting the operation of a tourist accommodation business even without an official classification • Voluntary character of the system • Quite detailed criteria about the building, facilities, and equipment of accommodation establishments • Flexibility provided by a points-based classification system • Provisions for offering bottled drinking water free of charge 	<ul style="list-style-type: none"> • Very small number of accredited accommodation businesses showing that the present systems never gained traction with the industry • No legal or administrative consequences for accommodation establishments using star ratings without having an official accreditation • Partly outdated classification criteria that do not reflect the current characteristics and future needs of the hospitality industry, considering that those criteria have not been updated since 2008 • Limited emphasis on service quality and the guest experience • While the Rules clearly define minimum requirements for hotels, they are missing for other types of accommodation such as motels, campsites, tourist camps, guest houses, rest houses and boarding houses • Lack of environmental guidelines that are nowadays common practice in the hospitality industry such as use of soap and shampoo dispensers (instead of individual plastic toiletry bottles), recycling, controlling energy and water consumption etc.

	<ul style="list-style-type: none"> • Extremely small size of bathrooms according to the 2008 guidelines • Lack of proper air-conditioning in lower-class accommodation • Forcing four- and five-star hotels to offer banquet space and multiple F&B outlets regardless of their feasibility and the character of the hotel (as in the case of a luxury boutique hotel) • Points-based criteria are in part vague and open to interpretation by the inspector • Absence of a clearly formulated non-smoking policy
--	--

1.2 The Current Accommodation Classification System of the Kyrgyz Republic

84. The current official accommodation classification system covers only two types of accommodation, **hotels, and motels** with a capacity of at least 10 rooms. Hotels and motels are classified in categories from 1 to 5 stars.
85. This ACS is based on the interstate standard, which was adopted within the framework of the Interstate Council of the CIS countries as **GOST 28681.4-95** (adopted by the resolution of the National Institute of Standards and Meteorology of the Kyrgyz Republic No. 12 dated 29/06/2004). Its use is voluntary. The standard specifies the general regulatory requirements for hotels and provides a list of the mandatory minimum requirements for each category.
86. Even though both countries based their official classification on the same initial document (the Interstate Standard 28681.4-95), Kazakhstan defined and applied it to a larger variety of accommodation types, as opposed to the Kyrgyz Republic that solely applies it to hotels and motels.

Accommodation types

87. Besides regular hotels and motels, there are several other types of accommodation to be found in the country that, however, lack an official definition and classification. Accommodation types to be found in the Kyrgyz Republic include:
- Hotels and motels ranging between one and five stars (according to the official classification).
 - Boutique hotels.
 - Bed & Breakfast (B&B).
 - Hostels.
 - Guest houses.
 - Yurts and yurt camps.
 - Resort hotels, including resorts, sanatoriums, boarding houses, recreation centers, and SPA hotels.
 - Ski resorts.
 - Ski complexes.
 - Hotels of international chains.

Legal definitions of accommodation types

88. According to GOST 28681.4-95, the following terms are used in this standard:

- Hotel: An enterprise intended for temporary residence.
- Motel: A hotel located near a motorway.
- Hotel, motel category: Classification grouping characterized by a certain set of requirements.

Classification categories

89. Categories are denoted by the symbol "★" (star). The number of stars increases in line with the improvement in the quality of service. Hotels are classified in five categories, whereas motels in four. The highest category of the **hotel** is designated "★★★★★", the lowest is "★". The highest category of the **motel** is "★★★★", the lowest is "★".

Classification criteria

90. The classification of hotels by category is based on a set of requirements assessing:
- Material and technical support;
 - Range and quality of services provided; and
 - Level of service.
91. In addition to the criteria applicable to each star rating category, there are several requirements for **hotels of any category**. Those common requirements include convenient access roads with the necessary road signs, a landscaped and consecrated adjacent territory, a paved area for short-term parking and maneuvering of vehicles (including solid buses), a sign with the name of the enterprise and an indication of its category, and, in case it possesses a separate entrance, a sign with the name of the restaurant. A hotel occupying a part of a building must have a separate entrance.
92. The hotel should have a favorable environmental location and must ensure the safety and health of guests and staff alike. For this purpose, the building should have emergency exits, stairs, and clearly visible information signs capable of offering orientation in both normal and emergency situations.
93. The hotel should be equipped with fire protection systems, warning systems and fire protection equipment provided by the Fire Safety Rules for residential buildings and hotels. The hotel must comply with the sanitary and hygienic norms and rules established by the sanitary and epidemiological supervision authorities in terms of cleanliness of premises, condition of plumbing equipment, waste disposal and effective protection from insects and rodents.
94. All electrical, gas, plumbing and sewerage equipment must be installed and operated in accordance with the Rules for the technical operation of hotels and their equipment. The hotel must be equipped with engineering systems and equipment that provide:
- Round the clock hot and cold-water supply (with a minimum supply of water for at least one day in areas with interruptions of water supply).
 - Sewerage.
 - Necessary heating installations, up to a temperature of at least 18.5 degrees Celsius.
 - Ventilation (natural or forced), which ensures normal air circulation and excludes the penetration of extraneous odors into rooms and public spaces.
 - Radio broadcasting and television in all rooms.
 - Telephone communication.

- All rooms and corridors must have natural and artificial lighting round the clock. Illumination provided by incandescent lamps (100 lux), or fluorescent lamps (200 lux) is considered standard.
95. When designing new or reconstructing old hotels, it is necessary to ensure wheelchair access for the reception and service of disabled people.
 96. In addition to the standards that are applicable to all hotels and motels regardless of their star rating, GOST 28681.4-95 presents a detailed list of star rating criteria that are required to be met in each star category in a section titled "Attachment A". These criteria cover provisions such as elevators, room types and sizes, furniture, in-room telephone connections, safety features, soundproofing, lighting, heating, appliances etc.
 97. Interestingly, the ACS requires new hotels or hotels under renovation to offer larger rooms in the four- and five-star categories than the currently operating hotels. However, **the ACS allows for rooms without a private bath not only in one-star but also in two-star hotels**, which is a major drawback when compared to two-star hotels in numerous other countries.

Organization operating the ACS

98. The Center for Standardization and Metrology under the Ministry of Economy and Finance of the Kyrgyz Republic (hereinafter the Center for Standardization) is the organization in charge of operating the ACS.

Mandatory or voluntary character of the classification

99. The accreditation is being implemented on a voluntary basis. It is carried out following the initiative of the applicant.
100. The classification is independent from the process of getting a license as an accommodation business.

Steps to be taken by an accommodation establishment to get classified

101. The procedure is straightforward: the interested business only needs to apply to the Center for Standardization stating its interest in passing the voluntary classification of the accommodation facility.
102. The compliance of the accommodation establishment with the star rating criteria will be reassessed following a three-year period.

Steps taken by the ACS operators for completing the classification process of an accommodation business

103. The Center for Standardization, after receiving a statement from the representative of the accommodation, will form a working group comprising between one and three employees of the Center. Representatives of the Center for Standardization will conduct an inspection and assess the compliance of the services provided by the accommodation facility to determine the level of star rating.
104. Following the inspection, a certificate of confirmation of the star level of the accommodation facility is issued, which is **valid for three years**.

Electronic infrastructure of the classification process

105. No reference to any specific software has been made by the Center for Standardization.

Communicating the ACS

106. On the part of the Center for Standardization, no relevant measures were undertaken for the dissemination and promotion of the accommodation classification system.

107. Some relevant work was carried out by the Department of Tourism between 2010 and 2012, and a draft regulation on the state system of classification of collective accommodation facilities in the Kyrgyz Republic was developed. This draft included more modern classification requirements compared to the current Classification standard developed in 1996. But, in view of legal restrictions according to the Regulation on the Activities of the Department of Tourism, it was noted that the Department of Tourism was not able to carry out classification work and to issue a certificate of conformity to accommodation facilities. Thus, this initiative and the draft document itself were rejected.

108. In recent years, the issue of classification of accommodation facilities has been reflected in the relevant government documents in the tourism promotion section. However, no significant progress has been made.

109. At the beginning of 2019, a meeting was held between the UNWTO Secretary-General, Mr. Zurab Pololikashvili and the former Deputy Minister, Mr. Maksat Damir uulu, where one of the issues raised focused on the classification of accommodation facilities in the Kyrgyz Republic. In October 2019, a working visit of UNWTO international expert, Ms. Egle Ližaitytė (Executive Director of Hotelstar Union in Lithuania), took place in Bishkek city. Upon conclusion of the working visit, a UNWTO Mission Report on the development of the hotel classification system in the Kyrgyz Republic was presented.

110. The UNWTO Mission Report includes an analysis of the current situation in the accommodation sector, interviews with Kyrgyz stakeholders, and general recommendations for a possible classification system of accommodation facilities in the Kyrgyz Republic. Among the interviewed stakeholders there was consensus that:

- the introduction of classification in accommodation facilities is necessary;
- the classification must be voluntary;
- classification requirements should be in accordance with current international standards, considering local cultural characteristics; and
- the classification procedure should be carried out by the Secretariat, which includes both representatives of government agencies and private business.

111. The UNWTO Mission Report was discussed at the local level with the participation of all Kyrgyz stakeholders, and it was noted that there is a need to involve an independent international expert on the classification of accommodation facilities to develop the Classification Document itself. After that, a second appeal was sent to UNWTO, and in view of their internal procedures, the Terms of Reference for attracting expert services was provided, which was discussed with the Coordination Group to assist the Government of the Kyrgyz Republic in tourism development. Subsequently, in Autumn 2020, it was reported that the Asian Development Bank, within the framework of the Almaty-Bishkek Economic Corridor project, would support this undertaking by developing a Joint Accommodation Classification System along the ABEC. Thus, the UNWTO Mission Report served as the motivation and impetus for the implementation of the current ACS project.

Acceptance of the current ACS by participating hotels

112. This UNWTO Mission Report from 2019 includes interesting information on the acceptance of the current ACS by hoteliers who applied for star rating accreditation:

“The few hotels that went through a voluntary classification standard procedure claimed they were forced to complete a lot of paperwork. The classification certificate didn’t give any added value to them. The standard was not viewed favourably by the private sector as it has never been about new trends, innovations, never giving guidelines or how to start and continue business. It was mentioned that the standard is functioning more like a restrictive instrument.

When hoteliers learned of the voluntary procedure, and especially after they realized that every hotel could award stars for themselves because there is a lack of control, they did not repeat the classification procedure.”⁴⁷

Comparison of the current Kyrgyz ACS with Hotelstars Union

113. The UNWTO Mission Report from 2019 includes a very interesting comparison between the current Kyrgyz ACS and the classification system being applied by **Hotelstars Union** (HSU), the world’s largest transnational hotel rating system. An overview of HSU can be found here: <https://www.hotelstars.eu>
114. According to this comparison, the current Kyrgyz ACS features some overrated, outdated, and missing criteria:⁴⁸

Overrated Criteria of the Current Hotel Classification System GOST 28681.4-95

- Obligatory garage for 3 stars
- Calculation of obligatory parking spaces in hotels
- Evaluation of Technical requirements of the building
- Sound isolation. Light requirements
- Obligatory telephones in the rooms or 1 telephone per hotel floor
- Obligatory apartment rooms for 2-5 stars
- Obligatory telephone in every apartment room for 3 stars
- Desk for newspapers in 4-5 stars
- Obligatory desk under TV
- Obligatory carpets
- Sauna towel obligatory for all categories
- Hygiene accessories obligatory with logo and in single bottles
- Obligatory meeting room for 3 stars
- Obligatory business center
- Obligatory fitness room
- Swimming pool and sauna obligatory for 4-5 stars
- Medical care
- Beauty services (hair cut services)
- Obligatory boutiques
- Obligatory car repair service for 4-5 stars

Outdated Criteria of the Current Hotel Classification System GOST 28681.4-95

- Radio obligatory for all categories
- Obligatory wake-up equipment for 4-5 stars. *It is now performed as wakeup call service*
- Obligatory ashtrays while more and more hotels turn into non-smoking areas.

⁴⁷ UNWTO (2019). Development of a hotel classification scheme in the Kyrgyz Republic: Mission Report. Madrid: UNWTO, p. 26

⁴⁸ UNWTO (2019). Development of a hotel classification scheme in the Kyrgyz Republic: Mission Report. Madrid: UNWTO, p. 7 onwards

- Obligatory telephone book in 2-5 stars
- Obligatory Telefax

Missing Criteria in the Current Hotel Classification System GOST 28681.4-95

- Obligatory sanitary facilities WC, shower tube, bathtub in the room for all-star categories (in Kyrgyz Republic, they are obligatory only for 3 stars)
- Access for people with disabilities
- Skilled staff
- Paying possibilities with cards
- IT service
- Umbrella for hotel guests
- Daily newspapers
- Turndown service
- Allergy friendly/allergy free rooms
- Non-smoking rooms
- Hotel website, direct booking possibilities, guest’s complaint system
- Eco label
- Organic food on the restaurant menu
- Mystery Guest services regularly purchased by the hotel

Unauthorized use of hotel stars

115. Hotel certification in the Kyrgyz Republic has always been voluntary. Considering that the current classification standards from 1995 do not meet modern requirements, hotel owners are assigning themselves star ratings (from 2 to 5 stars) based on the level of services they provide, which are then compared with hotels in other countries (particularly in Europe). This is practiced to this day as almost all hotels in the Kyrgyz Republic have not been classified according to the current official standards, and do not have an official certificate from the Center for Standardization.

116. The Kyrgyz Republic has a State Antimonopoly Agency, but, reiterating that certification has always been officially voluntary, this agency has no right to regulate or control. Thus, no negative consequences have been reported by non-certified hotels that are using hotel stars on social media, OTA platforms and their own website.

The strengths and weaknesses of the current ACS

117. The key points of the present ACS of the Kyrgyz Republic have been summarized in Table 1.2-1.

Table 1.2-1: Strength and weaknesses of the current accommodation classification system (ACS) of the Kyrgyz Republic

Strengths of the current ACS	Weaknesses of the current ACS
<ul style="list-style-type: none"> • Ease of starting the operation of a tourist accommodation business even without an official classification • Voluntary character of the system • Quite detailed criteria about the building, facilities, and equipment of accommodation establishments • New hotels or hotels under renovation are required to offer larger rooms in the four- and five-star categories than the currently operating hotels, thus gradually leading to an improved situation 	<ul style="list-style-type: none"> • Very small number of accredited accommodation businesses showing that the present systems never gained traction with the industry • Standards limited to hotels and motels • No legal or administrative consequences for accommodation establishments using star ratings without having an official accreditation • Partly outdated classification criteria that do not reflect the current characteristics and future needs of the hospitality industry, considering that those criteria haven’t been updated since 2004 • Limited emphasis on service quality and guest experience

	<ul style="list-style-type: none"> • Lack of points-based criteria, that would have offered accommodation operators a greater flexibility in achieving the preferred star rating • Lack of environmental guidelines that are nowadays common practice in the hospitality industry such as use of soap and shampoo dispensers (instead of individual plastic toiletry bottles), recycling, controlling energy and water consumption etc. • The ACS allows for rooms without a private bath not only in one-star but also in two-star hotels • Lack of proper air-conditioning in lower-class accommodation • Forcing four- and five-star hotels to offer banquet space and multiple F&B outlets regardless of their feasibility and the character of the hotel (as in the case of a luxury boutique hotel) • Absence of a clearly formulated non-smoking policy
--	--

1.3 Comparison of the Current Accommodation Classification Systems in Kazakhstan and the Kyrgyz Republic

118. The ACSs of both countries feature only a very small number of accredited accommodation establishments.

119. The two systems have many similarities, as detailed below:

- Similarities in the background and the development of the accommodation sector in both countries.
- Same original set of standards (the Interstate Standard 28681.4-95).
- Extensive overlap in classification standards.
- Outdated classification standards.
- Participation of accommodation establishments in the ACS has been extremely limited in both countries.
- Widespread abuse of star ratings, as most hotels are using stars without any official accreditation.

120. A key difference is that Kazakhstan has applied a section of the classification criteria not just to hotels and motels – as is the case with the Kyrgyz Republic – but also to other accommodation types such as tourist camps, guest houses, rest houses and boarding houses. However, this has not resulted in increased accreditation of those accommodation types.

121. The limited participation of accommodation establishments in the ACS combined with the lack of functional classification criteria for accommodation types other than hotels, has encouraged private-sector organizations to step in and introduce their own **unofficial** classification schemes. This has been the case with the **Kyrgyz Community Based Tourism Association** “Hospitality Kyrgyzstan” (KCBTA) launching its guest house and yurt camp accreditation with one to three Edelweiss flowers, but also with the **Kazakhstan Tourism Association** (KTA) awarding guest houses three levels of quality: golden (5 tulips), silver (3 tulips) and bronze (1 tulip).

122. Overall, both countries are facing a similar situation, as they have largely comparable ACSs and, at the same time, very low levels of participation by accommodation businesses, with hotel stars being widely used by hotels without official accreditation.

2. Stakeholders' Views of the Current ACS and Their Expectations from the New ACS

123. This chapter includes an overview of the positions expressed by stakeholders, as well as their recommendations for improving the classification process partly through a new joint ACS. To ensure a productive consultation process with all stakeholders, these were grouped as follows:
- **Stakeholder Group A:** Public-sector organizations (incl. national, regional, and local authorities) that are involved in tourism development as well as in licensing and controlling accommodation providers.
 - **Stakeholder Group B:** Industry associations of the hospitality sector.
 - **Stakeholder Group C:** Individual businesses from the hospitality sector covering all types of accommodation such as hotels (incl. international hotel brands and boutique hotels), motels, hostels, guesthouses, resorts, yurts, camps, and similar.
 - **Stakeholder Group D:** Industry associations and key businesses from other tourism-related sectors (for example, tour operators and travel agencies).
124. A series of group discussions and interviews were conducted to register the views of the public- and private-sector stakeholders regarding the ACS of their respective countries. Some stakeholders chose to submit their positions in writing.
125. The following stakeholders participated in the first consultation round as part of the present project. The entire project team would like to express its gratitude to all participants for their precious time and input.

Table 2-1: Stakeholders from Kazakhstan and the Kyrgyz Republic participating in the consultation about the joint ACS

Stakeholders from Kazakhstan	Stakeholders from the Kyrgyz Republic
<p><i>Public-sector stakeholders</i></p> <ul style="list-style-type: none"> • Tourism Industry Committee, Ministry of Culture & Sports • Tourism Department of Almaty city • Tourism Department of Almaty region • National Company “Kazakh Tourism” JSC • International University of Tourism and Hospitality, Ministry of Culture and Sports, Turkestan <p><i>Private-sector stakeholders (businesses and associations)</i></p> <ul style="list-style-type: none"> • Kazakhstan Association of Hotels & Restaurants • Kazakhstan Tourism Association • Eurasian Tourism Association • City Tourism Development Center <p><i>NGOs and other stakeholders</i></p> <ul style="list-style-type: none"> • National Chamber of Entrepreneurs of the Republic of Kazakhstan «Atameken» 	<p><i>Public-sector stakeholders</i></p> <ul style="list-style-type: none"> • Department of Tourism under the Ministry of Economy and Finance of the Kyrgyz Republic • State Enterprise "Kyrgyz Tourism" under the Ministry of Economy and Finance of the Kyrgyz Republic • Center for Standardization and Metrology under the Ministry of Economy and Finance of the Kyrgyz Republic • National Statistical Committee of the Kyrgyz Republic • State Tax Service under the Ministry of Economy and Finance of the Kyrgyz Republic • Mayor's Office of Bishkek • Manas International Airport <p><i>Private-sector stakeholders (businesses and associations)</i></p> <ul style="list-style-type: none"> • Kyrgyz Association of Tour Operators (KATO) • Kyrgyz Community Based Tourism Association (CBT) • Association "Club HoReCa" • Association of Resorts of Kyrgyzstan • Association of Ski resorts of the Kyrgyz Republic • Public Association "Destination Karakol" • Public Association "Destination Zhargalan Valley" • Public Association "Ethnocultural Tourist Destination South Shore of Issyk-Kul" • Hotels <ul style="list-style-type: none"> - Orion Hotel Bishkek - Ambassador Hotel - Hotel Europa - Grand Hotel • International Hotel Chain <ul style="list-style-type: none"> - Novotel Bishkek City Center - Ramada by Wyndham Bishkek Centre • Yurts (yurt camps) <ul style="list-style-type: none"> - Son-Kul Yurt Camp / Yurt Camp Almaluu / Nomad's Dream Yurt Camp - Nomad Lodge Tamga / Nomad Lodge Jety-Oguz / Nomad Lodge Son-Kul - Yurt Camp Alai <p><i>NGOs and other stakeholders</i></p> <ul style="list-style-type: none"> • Tian Shan Policy Center American University of Central Asia (PERETO project) • IFC Kyrgyzstan Investment and Growth Project World Bank Group • Higher School of Tourism and Hotel Business of the Kyrgyz-Turkish University "Manas" • Independent local tourism experts

2.1 Stakeholder feedback regarding the current and new ACS of Kazakhstan

Question: What are the strengths of the current ACS?

126. The voluntary character is considered a major strength of the ACS by the interviewed stakeholders. Another plus is that the system is concise and easy to understand.

Question: What are the weaknesses of the current ACS?

127. The key weakness of the ACS is its outdated criteria from 1995 and its lack of quality orientation. There has been no mechanism in place to periodically review and modernize the system despite the radical changes faced by the hospitality industry over the last 25 years.

128. Another weakness is the lack of control and monitorization that allows any business to freely use star ratings without having to fear repercussions, thus offering no incentive for businesses to apply for an official accreditation. This goes against standard practices in other countries, where hotels are offered incentives to join the legitimate star rating system, hereby automatically ensuring service quality. In Switzerland, for example, loans are issued with preferential interest rates to accommodation facilities interested in upgrading their category (if upgrade requires renovation / structural changes).

129. The ACS has no provisions for suspension or termination of accommodation establishments failing to adhere to the standards. It also offers no orientation in case of appeals or other administrative needs, nor are crucial documents requested capable of proving that a business complies with fire safety requirements, sanitary and hygienic and anti-epidemic rules, norms, and requirements in the field of environmental protection, labour relations, staff training and certifications, as well as other documents confirming the safety of the facility.

Question: Is there something missing from the current ACS?

130. Interviewees pointed out that a focus on service quality is missing. Currently, the main emphasis focuses on the building as such, and facilities provided to guests. There is no reference to junior suites and hostels, the latter representing a booming sector of the hospitality industry.

131. Among other points, and upon review, the following items should be considered for inclusion in the new ACS:

- Additional points for additional services.
- Staff language skills.
- Improved accessibility for wheelchair-bound guests.
- Internet access.
- Parking requirements.
- Power adapters.
- Sustainability measures.

132. A motivational system for businesses is also needed to encourage participation in the official classification; for instance, by providing preferential taxation. Uzbekistan, for example, is actively encouraging local accommodation businesses to associate themselves with an international brand, employs internationally renowned accounting firms (Deloitte, EY, KPMG, PWC) for certification, and offers financial incentives in the form of cashbacks to incentivize sectoral growth.

Question: Does the current ACS reflect the characteristics of local accommodation, and does it support a “sense of place” (for example, nomadic lifestyle with yurts)?

133. Most respondents replied negatively, as current criteria fail to effectively apply to yurts. According to one stakeholder, yurt camps could potentially be classified as one-star accommodation. The Kazakhstan Tourism Association created a set of standards for local accommodation such as guesthouses and yurts in 2016, but these were not incorporated into the official ACS.
134. For this type of accommodation, as is the case with guest houses, the present system is not suitable and lacks a system of incentives, also explainable due to the short tourist season and small bed capacity.
135. In some countries there is a practice of defining a separate category, in addition to star hotel ratings. For example, in Switzerland, a Swiss Lodge with basic amenities is classified below one star. However, the criteria and the categorization are clear to guests staying there.
136. In addition to stars, local accommodation offering high quality services can also be awarded a quality mark.

Question: Is the current ACS flexible enough for new hospitality concepts such as boutique hotels?

137. Luxury boutique hotels, which would achieve five-star status in other countries, would find it difficult to achieve the same status in Kazakhstan due to the present criteria. Boutique hotels need flexibility to develop their personality and adjust to tourist demand. Even though the system is flexible enough, the quality of the required services and amenities is not clearly defined.
138. A stakeholder pointed out that requirements for boutique hotels are included in the National Standard ST RK 2849-2016 “Tourist and excursion services. Places (means) of placement. General requirements”, approved in 2016. The standard indicates various types and categories of accommodation, as well as the requirements for various types of accommodation, including boutique hotels (as well as apart-hotels, resort hotels, motels etc.). However, as with yurts, the current system does not take these standards into account and the Rules do not specifically mention boutique hotels.

Question: What should change in the existing ACS?

139. The following changes were proposed by the interviewed stakeholders:
 - In the short term, without fundamental institutional and legislative reforms, an important change would be to amend current rules to update assessment criteria and introduce mechanisms for filing an appeal and similar administrative needs. In addition to assigning star categories, assigning a quality mark for a particular type of accommodation would also be necessary.
 - In the long term, the introduction of a new classification assignment mechanism, operated by a single system operator, and accommodation assessment by independent auditors, who have been trained and accredited by a single system operator, are also considered necessary. Additional changes proposed include:
 - Harmonization with current legislation and the approval of professional standards.
 - Expansion of the list of requirements in accordance with current realities.
 - A clear listing of the requirements for the provision of quality services.

- Revision of the system of mandatory criteria in accordance with international experience and best practices.
- Creation of a separate website containing detailed information on applicable procedures, requirements, and the process for obtaining a star/classification.
- Motivational and marketing tools for accommodation providers.

Question: Is the current ACS a good basis for the future or should it be replaced with a new one?

140. There were opposing answers to this question. Some stakeholders consider the current system a very good basis for updating the requirements and processes without fundamental institutional changes, while other stakeholders were in favour of developing a new certification system based on international experience and national trends. As one stakeholder remarked about the current ACS, it is *“a good basis for studying the disadvantages of the system. Based on this analysis, a more perfect model would need to be developed, but the classification rules themselves would have to be rewritten from scratch.”*

Question: How easy is it for international brands to get licensed and operate within the country?

141. Stakeholders agree that international brands, having their own high standards, do not face any difficulty getting licensed in Kazakhstan. Since the accommodation classification is voluntary, international brands are more likely to operate based on their own internal standards than national ones. National standards are easy to meet by international hotel chains.

Question: How do you assess the current work of the organization that currently oversees the issue of classification of accommodation facilities?

142. Answers were quite varied with some stakeholders expressing their dissatisfaction with the way the organization operates, while others approved of it. Interestingly, a third group of stakeholders considered that it is *“not possible to assess [the organization’s work], since the conformity assessment body is limited to sole participation and does not include industry associations and other authorities in the group. The assessment is not transparent, questionable and is not disclosed in open sources of information.”*

143. General to all replies was to observe that there is no transparency in the way the organization operates, and that it currently offers no motivation for businesses to get certified.

Question: What organization do you think should deal with the issue of classification of accommodation facilities: A state body, an industry association, or a public-private partnership organization? Alternatively, any other option?

144. Once again, the answers ranged from assigning classifications to an industry association, a self-regulatory organization, a state body (“with a mandatory system of incentives for business”) or, finally, a public-private entity consisting of representatives from a government authority, industry associations and professional tourism experts.

145. One recommendation was to appoint Kazakh Tourism as the operator of the ACS, considering that the present operator – the Committee of Technical Regulation and Metrology – oversees too many other industries.

146. One stakeholder could also envision the new ACS as a joint Central Asian system.

2.2 Stakeholder feedback regarding the current and new ACS of the Kyrgyz Republic

Question: What are the strengths of the current ACS?

147. Most interviewees considered that there is not much merit in the current system, as it was introduced many years ago, its criteria are greatly outdated and ignore technological and other recent developments. However, it was also pointed out that some of its standards remain valid and should be maintained in any future revision of the ACS.
148. Public-sector stakeholders were more supportive of the existing ACS. Strengths mentioned include the system's voluntary character and its ease of achieving star ratings. However, this also means that other non-hotel operators avoid classification. Even though it is an old system dating back to Soviet times, the majority believe that it is well crafted and remains a useful tool.
149. Some interviewees were not familiar with the ACS, its procedures, and its standards.

Question: What are the weaknesses of the current ACS?

150. The weaknesses can be summarized as follows:
- The ACS does not reflect current realities in the hospitality industry and includes outdated standards.
 - The current system does not emphasize service delivery and guest feedback.
 - There are no specific and detailed criteria for several accommodation types, such as yurts.
 - The system's standards are not applied properly.
 - The current ACS needs to be updated and adapted to new conditions by also considering special characteristics of the Kyrgyz accommodation sector.

Question: Is there something missing from the current ACS?

151. The ACS lacks a focus on the requirements of modern-day consumers. The concepts of "comfort" and "comfortable" are absent in the ACS. Therefore, the norms corresponding to these concepts are also absent. The various accommodation types must also be clearly defined, described in detail, and provided with distinct checklists, as there are significant differences between hotels, motels, hostels, guesthouses, and yurt camps.
152. A major omission relates to technological developments in the accommodation sector over the past decades. The procedures and the mechanism of the ACS should also be clearly described.
153. Finally, standards reflecting the **national characteristics** of accommodation businesses should be included into the criteria list ("national characteristics that add flavor to the country and to the national tourism product"). Thus, the new ACS would result from combining international standards (most standards) with local peculiarities.

Question: Does the current ACS reflect the characteristics of local accommodation, and does it support a "sense of place"?

154. The consensus among interviewees was that the current ACS does not reflect the characteristics of local accommodation. However, the ACS does not create any

obstacles to businesses wishing to add more “sense of place” to their customer experience.

Question: Is the current ACS flexible enough for new hospitality concepts such as boutique hotels?

155. Again, stakeholders agreed that the ACS does not foment the creation of new hospitality concepts and is not flexible enough to classify businesses developing outside the norm concepts, such as boutique hotels and glamping.

Question: What should change in the existing ACS?

156. Wide-ranging changes were proposed by interviewees: while the system itself received a positive rating (“it works pretty well”), proposed changes included the addition of standards for new types of accommodation, as well as the inclusion of national accommodation types, such as yurt camps, within the system. A stakeholder proposed the inclusion of a checklist already being applied by the Kyrgyz Community Based Tourism Association “Hospitality Kyrgyzstan” (KCBTA) for the accreditation of guesthouses and yurt camps, whereas another stakeholder stressed the need for “unified room classification standards and a flexible system in classifying accommodation facilities by considering trends in the hospitality industry.”

157. It was also noted that the system’s standards and quality requirements should always reflect the needs of the market and preclude accommodation providers from creating false expectations. It should become more transparent and objective, thus avoiding any hint of corruption and bribery. Most interviewees insisted on maintaining the voluntary character of the ACS.

158. Other changes proposed focused on accommodation types (for example, eco hotels, glamping, etc.), technological developments such as Internet access and smart TVs, and the removal of obsolete criteria such as providing printed newspapers and magazines in four- and five-star hotels.

Question: Is the current ACS a good basis for the future or should it be replaced with a new one?

159. Opinions were divided, as most stakeholders consider the current ACS a good framework for incorporating the needed improvements, while other stakeholders are advocating the introduction of a new system by perhaps retaining around 30% of the present criteria.

Question: How easy is it for international brands to get licensed and operate within the country?

160. Judging from the replies of the interviewees, international hotel brands do not seem to be facing difficulties in the Kyrgyz Republic, as it is easy for them to obtain a license for operating within the country. The challenge is not so much to achieve the official star rating criteria, as to properly apply their global brand standards.

161. As the licensing procedure is considered quite straightforward, it was proposed that the government should focus its attention on the country's investment potential and the level of confidence in government agencies, to attract more international hotel projects.

Question: How do you assess the current work of the organization that currently oversees the issue of classification of accommodation facilities?

162. Private-sector stakeholders appear to be critical of the work being performed by the Center for Standardization regarding accommodation classification. As the Center lacks the expertise and does not actively promote classification, the number of accredited businesses remains extremely low. The Center is also being credited with the outdated classification criteria and the lack of initiative to change standards dating back to 1995.
163. While some interviewees doubt whether public stakeholders would have the expertise for accrediting an accommodation business, others recognise the flexibility with which accreditation is being handled.

Question: What organization do you think should deal with the issue of classification of accommodation facilities: A state body, an industry association, or a public-private partnership organization? Alternatively, any other option?

164. Despite critical views of the current system, almost all stakeholders agreed that the government – and especially the Department of Tourism – has a role to play in ensuring the independence of the classification process, preferably in cooperation with industry associations. A **commission** including representatives of the public and the private sector is the preferred option among interviewees.
165. Besides a government agency, such as the Center for Standardization, it was proposed that the ACS could also be operated by an industry association (through a dedicated department or secretariat) or by a new entity set up for this specific purpose. Some stakeholders stressed that the ACS should be overseen by an **independent commission** employing independent accredited classification experts.

Other issues

166. Guest reviews on platforms such as TripAdvisor and Booking.com have been increasingly affecting travellers' choice of accommodation, as official classification has become less important over recent years. It was pointed out that the credibility of the ACS is crucial in maintaining its relevance and should focus on avoiding the creation of false expectations by accommodation operators.
167. Finally, it was stressed that a properly designed ACS can be helpful for businesspeople and travellers alike. A new joint ACS would assist investors in better understanding necessary standards, such as room size and services needed. Moreover, as most visitors to the country are interested in new experiences, the focus and scope of the ACS should be expanded beyond four- and five-star hotels.

3. International Trends Affecting Accommodation Classification Systems

168. Over recent decades, accommodation classification has been evolving together with the hospitality industry. The issue of whether a national classification system is up to the requirements of the industry is a common topic.
169. Projects focused on updating accommodation classification systems are underway in several countries, with several more contemplating such a move. However, it must be stressed that such projects **almost always originate from the hotel sector**. Other accommodation types rarely ignite any major overhaul of a country's official accommodation classification system (ACS). This is the reason why **most references in this chapter are made to hotels instead of to other accommodation types**. Nevertheless, the rationale of officially classifying an accommodation business is the same and applies to the industry's entire typology. Thus, any generalizations based on this chapter's conclusions on hotel classification can be safely applied to all accommodation types.
170. This chapter is based on the documents mentioned in the *Introduction* section of the present report as well as on the findings from an **international survey among hotel classification specialists** presented in Annex A1. The aim of the survey was twofold: to determine which trends and developments have shaped the hotel classification systems over recent years, and to establish the future of those systems through the eyes of the people who oversee operating them.
171. Of the official national hotel classification systems represented in the survey, most are full members or cooperating with Hotelstars Union (HSU). HSU currently represents the **gold standard for a cross-border approach to official accommodation classification**. This system has been successful since its adoption by Germany, Austria, and Switzerland in 2009 and has maintained its success during its gradual expansion to more European countries (unofficially also outside of Europe).
172. The extensive excerpts from the interview transcripts, as well as the conclusions from the international studies and reports presented in Annex A1, highlight nearly **all aspects of a future-proof classification system**, which provides value to both accommodation operators and guests.
173. UNTWO, as part of the global discussion about hotel classification, summarizes the benefits and the challenges of classification systems in the Tables 3-1 and 3-2 below. UNWTO identifies four parties benefitting from official hotel classification, namely consumers as hotel guests, accommodation providers, travel agencies – both traditional offline and online travel agencies – and the implementing organisations, i.e., those in charge of operating the classification systems. Consumers benefit from better service quality, enjoy a more predictable and transparent product, know what kind of experience to expect and have access to detailed information about the standards on offer by a neutral source. Official classification is particularly beneficial for smaller independent hotels, adding credibility and transparency to their offerings and helping them increase guest satisfaction by applying higher quality standards. It directly impacts a hotel's pricing, motivates the staff, and can be used as a marketing tool. Travel agencies, on the other hand, can improve comparability and fulfill guest expectations by properly arranging hotel information, especially online, and can better justify applicable differences in room rates. Implementing organisations can more easily assess and provide guidance to hotels about how to improve service quality and assure guest satisfaction.

174. There are also several drawbacks and challenges in relation to official classification (see Table 3-2). Consumers may get confused by the different standards being applied in different countries, the overly emphasis on technical standards instead of service-focused elements, and the oftentimes misleading self-classification happening in some countries. Many hotels are struggling to adjust to evolving consumer preferences and price their offerings in accordance with their classification. They also face the burden of classification costs, which they may pass on to consumers. Travel agencies may find it troubling to deal with the multiplicity of classification systems across borders and to interconnect online hotel listings with official star ratings. Finally, implementing organizations need to keep up with ever-changing consumer expectations, make their complex standards easy to understand, adjust to the growing typology of hotels, and manage internal challenges related to staffing and economic viability.

Table 3-1: Benefits of official hotel classification (Source: UNWTO (2015). Hotel Classification Systems: Recurrence of criteria in 4- and 5-stars hotels. Madrid: UNWTO)

Consumers	Accommodation providers	Travel agents (online and offline)	Implementing organisation
	Positioning independent and small hotels	Positions hotels online	Positioning destination
Improved service quality	Quality focus for destination, thereby increasing its attractiveness		Increased tourism service quality
	Quality assurance		
Expectation indicator	Expectation indicator	Expectation indicator	Consistent manner of evaluation
Standards information		Standards information	
Neutral informant		Neutral standards informant	
	Credibility of offering	Credible informant	
Better informed tour operators and travel agents	Marketing platform		Marketing platform
Reassurance		Reassurance	
	Increased guest satisfaction		Increased tourist satisfaction
Product transparency	Product transparency	Product transparency	Product transparency
Predictability Comparability	Predictability Comparability	Predictability Comparability	Attract investment
	Justified rates	Justified rates	
	Increased rates and margins		
	Focus and motivate staff		
	Internal control/ management/ Strategic maintenance planning	Improved networking	Simplified monitoring
	Simplified procurement		Simplified tender procedures

Table 3-2: Challenges of official hotel classification (Source: UNWTO (2015). Hotel Classification Systems: Recurrence of criteria in 4- and 5-stars hotels. Madrid: UNWTO)

Consumers	Accommodation providers	Travel agents (online and offline)	Implementing organisation
Multiplicity of systems and system implementation		Multiplicity of systems and system implementation	
	Evolving consumer expectations	Evolving consumer expectations	Evolving consumer expectations
Misleading self-classification by hotels	Misleading self-classification by hotels		Employing qualified assessors
	Matching price to classification		
	Evolving consumer expectations and their impacts on criteria		Keeping criteria up to date with more informed consumer expectations
		Inconsistency in interpreting	Keeping it understandable and relevant for the consumer
Higher rates due to classification expenses	Classification expenses		The financial sustainability
Growth in use of Guest Review sites and OTAs	Requires integration/interface with OTA	Lack of interface to the OTA	Requires integration/interface with OTA
			Frequency of re-assessments
Lack of quality and service-focused elements			Definition and assessment of subjective elements
			Providing for varying forms of accommodation e.g. boutique, heritage etc.

3.1 Key Characteristics of Hotel Classification Systems

175. According to the 2021 survey of hotel classification systems worldwide, there is a clear trend towards making hotel classification **voluntary**. There has also been an increase in **hotel associations** operating star ratings themselves over recent years. However, the **government** still plays a central role in officially classifying hotels in more than half of the surveyed countries. Hotel classification very much relies on **site inspections**. Details can be found in Annex A1.
176. The most crucial objective of classification systems internationally is assuring **service quality** and verifying the **customer experience**. Measuring and improving those intangible elements is nowadays the **main challenge of a classification system**, as opposed to the task of assessing buildings and equipment which preoccupied the hospitality industry for many decades.
177. It is very much a *hardware vs. software* dilemma, with the “software” dimension gaining ground over recent years. As most accommodation businesses have a good

understanding of their hardware-related issues, they are now trying to create the right atmosphere and to evoke positive feelings among their guests. An up-to-date classification system can be a very useful tool by helping businesses improve the guest experience and providing travellers with needed information as to what to expect from their next stay. **This makes it necessary for classification systems to shift attention from hotel facilities to customer experience and service quality**, a transition many accommodation businesses are still struggling with.

178. Technology is being increasingly used to better understand and evaluate actual customer experiences offered by the hospitality industry. Several classification system operators already work with **guest review aggregators** such as TrustYou, Revinat and ReviewPro, while other are considering such a move. These tools can prove helpful in conducting a sentiment analysis among hotel guests in their country to identify frequent complaints and understand changes in guest attitudes. Thus, the incorporation of **online reputation management** into the classification system provides very useful and concrete indications concerning the standards of the services provided by different hotel establishments.
179. Based on the replies of the interviewed classification experts, the objectives of a classification system can be summarised as follows:
 - Transparency, so that both guests and hoteliers know what stars mean.
 - Service quality.
 - Quality of the guest experience.
 - Fulfilling guest expectations.
 - Safety and security.
 - Cleanliness and hygiene.
 - Maintenance.
 - Sustainability.
180. Hotel classification systems are becoming increasingly **flexible**. There are regular classification revisions, to ensure consonance with customer needs and preferences. Hotels are also being given the liberty of achieving the desired star status by collecting points instead of fulfilling only mandatory criteria. There is a list of **voluntary criteria**, each yielding a specific number of points, and it is up to the business to decide upon the combination of criteria needed to acquire the desired classification (e.g., three stars or four stars). Such flexibility allows businesses to develop their own personality, which results in a plurality of offer.
181. The proliferation of guest rating platforms such as TripAdvisor had a profound impact on star ratings five to ten years ago. Travellers started to heavily rely on these platforms when choosing accommodation, which furthermore led to confusion as to applicable ratings (e.g., a four-star hotel on an OTA's platform may not be a four-star hotel according to official classification systems). This situation forced classification system operators to adapt their star ratings to new conditions, as hoteliers came to believe that hotel stars were not relevant anymore. Due to recent changes within classification systems, hoteliers now seem to be convinced of the relevance of hotel stars.
182. Hotel stars have provided a reliable beacon for consumers for a very long time, whereas consumer reviews may lead to some confusion when stars are being used. The two approaches serve different needs: Official classification offers an **objective evaluation** of hotels, while guest review platforms provide **subjective opinions and ratings** made by travellers. Both have their value and are **complementing** the information available to travellers. The COVID-19 pandemic reminded consumers of the importance of classification systems, especially regarding hygiene and safety, and has led hoteliers to

seek further investments in this area. Especially among small hotels, classification can be seen as a valuable marketing quality management tool.

183. A growing number of official classification systems – incl. HSU members as well as Abu Dhabi – are using online guest reviews as an input in their ratings. In Germany, for instance, guest reviews on TripAdvisor, HolidayCheck and other platforms are being consulted by auditors looking for complaints and weak spots before inspecting a hotel. There is a surveillance algorithm in place alarming DEHOGA, Germany's hotel classification system operator, of any dramatic change in guest ratings, which is then addressed together with the affected hotel.
184. There was a **recent court decision in France against Booking.com** using its own stars instead of the official hotel stars. Now the company is forced to use only official stars on its website. Booking.com already cooperates with Germany regarding data exchange and has been supplied with the official star ratings of all German hotels. This is happening in other countries as well. In New Zealand, OTAs and TripAdvisor have reinstated the official Qualmark ratings, while two years ago they would have used self- and guest ratings.
185. There are examples of successful **cross-border classification systems** throughout the world. The success and rapid growth of HSU has shown that **cross-border cooperation** and **harmonization of hotel classification systems** have been long overdue. The case of Latvia is quite telling: The country operated its own national classification system until 2006. Between 2006 and 2010 they joined the Baltic system, later the Nordic-Baltic system, and finally the HSU, as they considered the HSU system more objective. Thus, the geographic scope of cooperation in the field of hotel classification in Europe kept expanding and now encompasses 20 countries, with more to follow. There has also been cooperation between countries in Southern Africa, i.e., South Africa, Seychelles, Zambia, Lesotho, Malawi, Zimbabwe, and Mozambique.
186. A prerequisite for successfully introducing cross-border classification systems is **flexibility**. A trans-national system must be flexible enough to deal with national characteristics. For this purpose, a **modular approach** should be employed meaning that the cross-border classification system comprises two components:
 - Common standards, plus
 - National criteria to be defined by each country.
187. Hotel classification systems should be regularly reviewed, and classification criteria adapted to **changing customer needs** and **technological advances**. COVID-19 is the most recent example of how behavior and needs have changed, thus making it necessary to evolve star-rating standards. Especially standards concerning **cleanliness and hygiene** have been updated and now reflect new health and safety protocols aimed at ensuring an adequate balance between leisure / comfort and security.
188. As travellers are becoming more socially conscious, the hospitality sector needs to communicate how it is having a positive impact on society. In addition to **sustainability criteria**, **working conditions** for staff members and **social responsibility initiatives** such as food waste elimination can be included as criteria in a classification system. **Inclusiveness** is also a topic of growing importance, as hospitality businesses need to showcase how they are offering better **accessibility** (e.g., for guests with reduced mobility) and are catering to **guests with special requirements**, for instance by covering dietary needs like vegetarian, vegan, gluten-free, lactose-free, halal, kosher, low-fat, low-sodium, anti-allergenic, and similar.

189. At the operational level it is important for an official classification system to be as affordable and unbureaucratic as possible, with **easy online and paperless registration** becoming the norm. Accommodation businesses have also been very appreciative of classification systems offering in addition to their appraisals, advice, training, and managerial tools for maintaining and improving service quality.
190. More information about hotel classification systems internationally is being provided in Annex A1.

3.2 Classification of Other Accommodation Types

191. Outside the hotel sector, a plethora of classification systems for other accommodation types can be found in numerous countries. However, no classification form has prevailed internationally to the same degree as hotel stars. These classifications come in many different shapes, such as *stars* (e.g., up to five stars for bed & breakfast properties in Ireland, up to five stars for German campsites) or *keys* (e.g., up to four keys for holiday apartments in Greece) or *fireplaces* (e.g. up to four “fireplaces” by Logis de France).
192. This chapter includes some examples of such accommodation classifications. They either represent the respective country’s official classification, or they have resulted from the initiative of an industry association or even a private company.
193. As pictured below in Exhibit 3.2-1, **Slovenia** is classifying its **tourist farms** into four categories ranging **from one apple** (“simply furnished rooms with a shared bathroom and toilet”) **to four apples**, the latter category representing the most comfortable farm stays. This rating system has been set up by the Chamber of Agriculture and Forestry of Slovenia, with the support of the Ministry of Agriculture, and is being promoted by the Slovenian Tourist Board. Classification criteria include not just typical accommodation standards such as bathrooms and furniture, but also sustainability, on-farm activities, local products, and home-grown food.
194. Classified tourist farms with accommodation represent one of five different farm types being promoted by the Slovenian government (see Exhibit 3.2-2). The other four types include excursion farms, wineries, campsites and Osmica wine shops, and lack classification.

Exhibit 3.2-1: Classification of tourist farms in Slovenia
 (Source: <https://www.farmtourism.si/category>)



195. It is quite interesting to see that the Slovenian Tourist Board is not promoting farm tourism as an accommodation type, but as a nature-based experience ideal for families capable of offering authentic culinary highlights. Exhibit 3.2-3 includes a selection of images being used for communicating this specific product. Experiences offered by the country's 850 accredited tourist farms are described on the country's official tourism website <https://www.slovenia.info/en/things-to-do/discover-nature/countryside>, as follows:

Tourist Farms

In the countryside, you will be welcomed by friendly hosts, who live in nature and work with nature. The comfortable rooms that they offer are usually furnished with everything that a modern person needs. Certain tourist farms are specialised. There is something for children and families, for bikers and hikers, or you can opt for wine-growing farms or farms devoted to organic food production.

Family-friendly farms

Spend your holiday with your children differently – in an authentic environment with excellent healthy food. Domestic animals are commonplace in the countryside and children can learn where milk comes from, what garden vegetables taste like, how cheese is made or how bread is baked.

Exhibit 3.2-2: Types of tourist farms in Slovenia (Source: <https://www.farmtourism.si/tourist-farm-type>)



Tourist farm with accommodation

offers guests accommodation on the farm with a food offer or just a rental of apartments. Guests can choose between bed and breakfast, half board and full board or can rent an apartment on the farm. Guests are to announce their intended arrival.



Excursion farm

(warm and cold dishes and beverages). Excursion farms are typically open on Fridays, Saturdays, and Sundays, and during the week for groups who call in advance. The farm must be notified prior to your arrival.



Winery

(cold snacks, wine, and non-alcoholic beverages). Wineries are typically open on Fridays, Saturdays, and Sundays, and during the week for groups who call in advance. The winery must be notified prior to your arrival.



Campsite

On the farm, a campsite with all the necessary equipment, mandatory for an arranged camping ground, is available to the guests. Please announce your visit beforehand.



Osmica

offers wine and non-alcoholic beverages, three locally distinctive hot meals, cold snacks, bread and pastries. Osmica wine shops are open up to ten days maximum twice a year, most often in spring and autumn. They originate from the time of Maria Theresa and are widespread mainly in the Primorska region. By the roads they are marked with ivy twigs, and in the courtyards with bunches of ivy, called 'fraska'.

Exhibit 3.2-3: Imagery used for promoting tourist farms in Slovenia
(Source: <https://www.slovenia.info/en/things-to-do/discover-nature/countryside>)



196. In **Germany**, ADAC, the General German Automobile Club, is operating **star ratings for campsites**. ADAC is Europe's largest motoring association and among its many activities it has also introduced its own "ADAC Classification", a rating of available campsites, which is being awarded in full or half stars **with five stars being the highest rating**. The classification is based on results in five different performance areas, i.e., sanitary facilities, site, campsite stores, recreational offering and swimming opportunities (source: <http://adac-camping.de/adac-classification-criteria/?lang=en>).

197. According to the ADAC classification, not all rating criteria are equally important to campers. Therefore, the different campsite characteristics weigh differently on the ratings:

- Sanitary facilities 39%
- Site 26%
- Campsite stores 10%
- Recreational offering 12,5%
- Swimming opportunities 12,5%

198. Sanitary facilities have the highest weight within the ADAC Classification, as they are the main selection criterion for campers and the most important aspect of the campsite infrastructure.

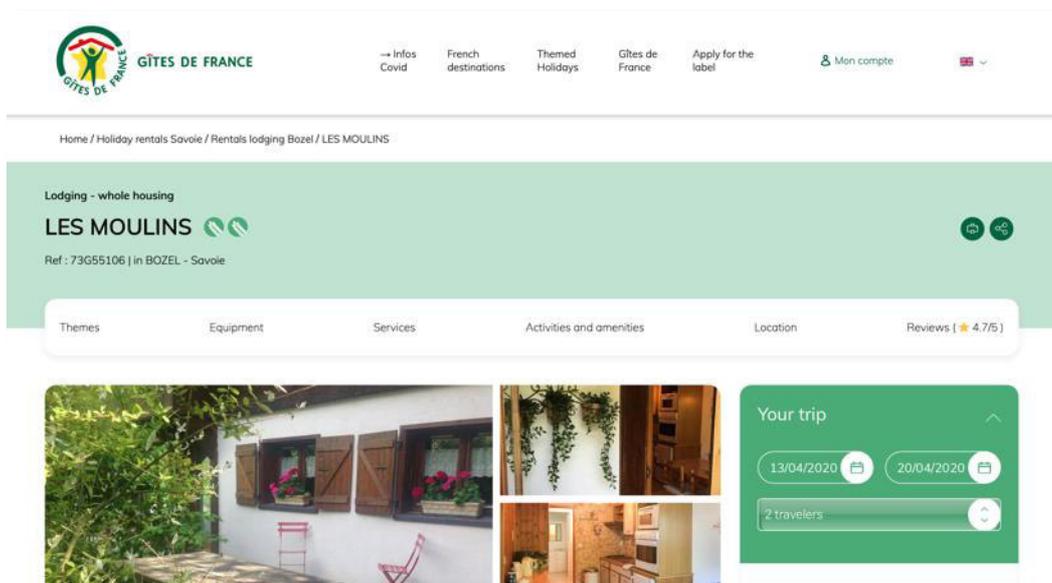
199. Interestingly, as can be seen in Exhibit 3.2-4, ADAC's campsite directory www.pincamp.de features not just the star rating (highlighted in red) but also the guest review score (highlighted in blue) in the detailed listing of each campsite. In the example below, the campsite features five stars and a guest rating of 4.1 (out of 5).

Exhibit 3.2-4: Example of a campsite listing on ADAC's German campsite directory
(Source: <https://www.pincamp.de/campingplaetze/ostseecamping-familie-heide>)

The screenshot shows a web browser displaying the page for 'Ostseecamping Familie Heide' on the pincamp.de website. The page features two main images: a motorhome on the left and a blue building on the right. Below the images, the title 'Ostseecamping Familie Heide' is prominently displayed. Underneath the title, there are several icons and text elements: 'Kontakt & Adresse', 'Campingplatz Homepage', a star rating of 5 stars (circled in red), 'ADAC Klassifikation (Details)', 'ADAC Superplatz', and 'ADAC Campcard'. Below these, a guest review score of 4.1 is shown, circled in blue, with the text 'Sehr gut' and 'Bewertungen (2)'. The page also includes various facility icons such as 'Strandnähe', 'Schwimmbad', 'Hunde erlaubt', 'Kinderfreundlich', 'Restaurant', 'Brötchenservice', 'Shopping', and 'Internet'. At the bottom, there is a short description: 'Familiär geführte, quirlige 'Campingstadt' an der Ostsee mit zahlreichen Einrichtungen und Angeboten für große und kleine Gäste.'

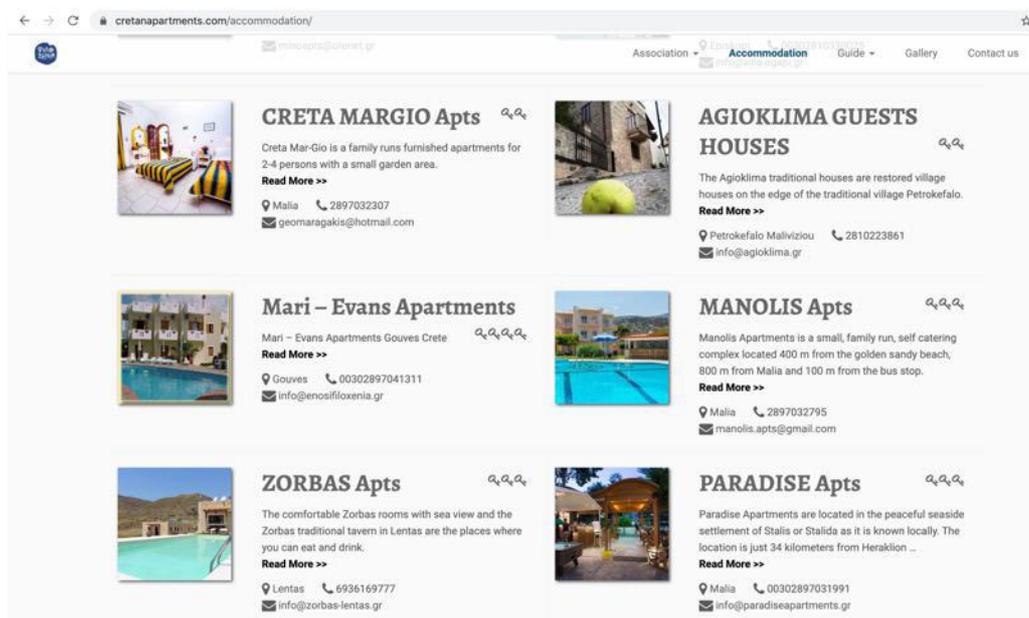
200. Gîtes de **France** (fully named Fédération Nationale des Gîtes de France) is a French organization that lists and rates 56,000 bed and breakfasts and self-catering gîtes throughout the country. As seen in Exhibit 3.2-5, each establishment is classified with a **maximum of four wheat ears**. The federation's website also features guest reviews and ratings in addition to its own classification.

Exhibit 3.2-5: Example of a self-catering listing on Gîtes de France’s portal
 (Source: <https://www.gites-de-france.com/en/>)



201. In **Greece**, hotels are classified according to star categories (from one to five stars), whereas other types of tourist accommodation such as bed & breakfasts and holiday apartments are being awarded **between one and four keys** following inspection by an accredited certification company. An example of classified accommodation providers from the island of Crete is provided in Exhibit 3.2-6. Both hotel and non-hotel ratings are being regulated in detail by official legislation and are compulsory since the new system’s introduction in 2015. However, as accommodations need to pay an accredited certification company for getting classified and the deadline for completing mandatory classification has been repeatedly extended, the number of certified businesses remains very small.

Exhibit 3.2-6: Example of a tourist accommodation listing from Crete, Greece
 (Source: <https://cretanapartments.com/accommodation/>)



202. As can be seen in the examples, there are quite different approaches to classification of non-hotel tourist accommodation. Whereas hotels use the universally known hotel stars (ranging between one and five stars), other accommodation types have been trying to develop their own rating concepts with a varying degree of success (success being measured in how recognizable a rating has become both in the domestic and the international market). Some classification providers have resorted to the deep-rooted star symbols (as in the case of the German campsite ratings by ADAC), while others have tried to establish an alternative to stars by keeping **the same rationale**: More points mean more comfort and luxury as well as higher prices. **Whatever the symbol, be it apples or flowers or keys or wheat eyes, they never exceed the number five and are quite obviously substituting for stars.**

203. There are three reasons for using symbols other than stars:

- Avoiding confusion with a country's official hotel ratings.
- Signalling to the market that classified businesses are non-hotel accommodation.
- Existence of legislation awarding the use of stars exclusively to hotels.

PART II: The New Joint ACS of Kazakhstan and the Kyrgyz Republic

4. Guiding Principles for a New Joint ACS

204. The present chapter includes several key guidelines for the new joint ACS of Kazakhstan and the Kyrgyz Republic. The points discussed below also represent crucial decisions to be made to finalise the details of the new joint ACS.

4.1 Geographic Scope of the New Joint ACS

205. The mandate of the current project is the development of a joint accommodation classification system (ACS) for Kazakhstan and the Kyrgyz Republic. This new joint ACS is intended to replace existing national ACSs, with the **implications of leaving the current national systems behind** being considered low:

- Participation of accommodation establishments in the national ACS has been extremely limited in both countries.
- Classification standards in both ACSs are greatly outdated.
- In both countries, hotel stars are being widely used by hotels without official accreditation.

206. Moreover, introducing the same ACS to Kazakhstan and the Kyrgyz Republic has some obvious **advantages** considering similar aspects within both countries:

- The development of the accommodation sector in both countries has a very similar historic and cultural background.
- Accommodation businesses and hotels have been exposed to comparable classification standards over recent decades, meaning that the mindset about classification is similar.
- There is a great deal of overlap concerning the various accommodation types.

207. The preparation of the new joint ACS will expedite the much-needed modernization of the classification system in both countries. By ensuring the flexibility of the new system, it should be easy to adapt the joint ACS to unique national characteristics.

208. With flexibility a key feature of the joint ACS, the geographic scope of the new system could, at a later stage, be widened to **other Central Asian countries**. This, as discussed in Chapter 3, would be in line with a greater international trend. In Central Asia, there is a high level of intraregional travel. Thus, travelers would have more realistic expectations when booking accommodation in another Central Asian country.

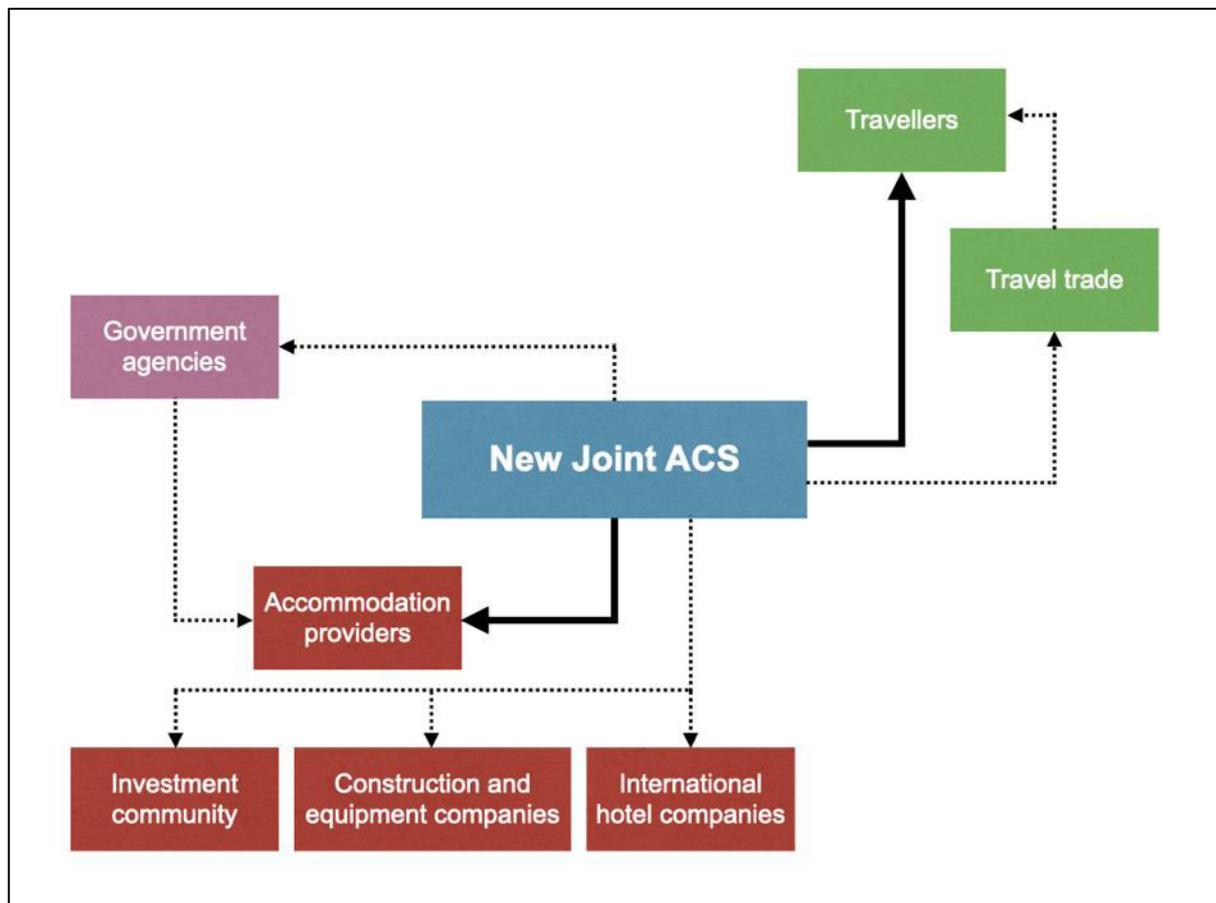
209. The joint ACS could be utilized as a marketing tool capable of presenting Central Asia as a quality tourist destination. Simultaneously, the joint ACS could also be used to collect accurate and comparable statistics on the hospitality industry of the region.

210. In case of a wider adoption of the joint ACS throughout Central Asia, it would prove very helpful to establish an independent, authoritative organization that could oversee the activities of national partners in each country.

4.2 Users and Beneficiaries of the New Joint ACS

211. The new system’s main users will be **travellers**, i.e., guests using accommodation for their stay in Kazakhstan and the Kyrgyz Republic, as well as the **accommodation establishments** being classified. The system will, however, serve a broader community as pictured in Exhibit 4.2-1, as there will be additional organizations benefitting from the new joint ACS.

Exhibit 4.2-1: Users and beneficiaries of the new joint accommodation classification system (ACS) of Kazakhstan and the Kyrgyz Republic



212. The classification will provide much-needed information to the so-called travel trade, i.e., the sector comprising businesses organizing and selling trips, such as tour operators, travel agencies, online travel agencies (OTAs), professional congress organizers and similar enterprises. Such a system provides the needed transparency, so that resellers of accommodation services can compare available options and recommend the most fitting options to their customers.

213. Another group of beneficiaries includes stakeholders involved in investing, developing, constructing, equipping, and operating accommodation businesses, such as investors, construction companies, businesses dealing with equipment for hospitality businesses, and even international hotel chains that would need to be aware of applicable national rules.

214. Finally, the new ACS will help the national tourism authorities in dealing with the accommodation sector, while simultaneously ensuring the sector’s gradual modernization and service quality improvement.

4.3 Operator of the New Joint ACS

215. There are three potential options as to who should operate the new joint accommodation classification system (ACS):
- A government agency.
 - An industry association.
 - A public-private cooperation.
216. Judging from the input received during the stakeholder consultation process, the **industry associations** in the two countries do not seem to have the needed capacity for taking on the responsibility of operating a nation-wide classification programme, especially when considering that the introduction of the new ACS aims at encouraging the largest possible participation of businesses. Stakeholders have also been critical of the **present ACS operators**, that is, the Committee of Technical Regulation and Metrology in Kazakhstan, and the Center for Standardization of the Kyrgyz Republic. Both organizations lack specific expertise in hospitality and tourism, cannot provide guidance to accommodation businesses on how to improve the guest experience, were not able to push forward with an update of the highly outdated classification criteria, and did not actively pursue to increase the number of classified accommodation establishments.
217. For cost and administrative reasons, **it is not recommended to set up a new legal entity just for operating the new joint ACS**. Much-needed **public-private cooperation** in the committees to be formed as part of the new ACS (those committees will be discussed in Chapter 7), as opposed to a new joint company or non-profit organization, should be considered the preferred option.
218. Setting up a new legal entity by the two countries partnering for the implementation of the new joint ACS is not recommended either. The needed cooperation should be conducted through organizations that already operate in the field of tourism.
219. The organization to be assigned the role of the ACS operator in each country – hereinafter the **National ACS Operator** – should have the flexibility of setting up a **new dedicated classification department** and staffing it with the needed administrative personnel. It should also be able **to work with outside contractors**, who would conduct the inspections and onsite assessments. Considering that participation in the new joint ACS shall be voluntary, each National ACS Operator should be seen as a **service provider**, i.e., conducting accommodation ratings as a service provided to any interested business.
220. Choosing the most appropriate organization for the role of National ACS Operator means to balance diverse elements:
- Representing the country’s official classification system with consistency (i.e., applying the classification standards in the same way to all businesses throughout the country), integrity, transparency, objectivity, fairness, independence and free from any outside influence or potential conflicts of interest.
 - Having sufficient monetary and human resources for implementing such a nationwide project.
 - Providing the service of accommodation classification in a professional manner.
 - Offering advice and support to accommodation providers and helping them to improve their **value for money offer**.
221. Considering all the facts and the present situation in Kazakhstan and the Kyrgyz Republic, as well as the experience from other countries, **it is recommended that the**

new joint ACS be operated by a government agency as close to the tourism industry as possible.⁴⁹

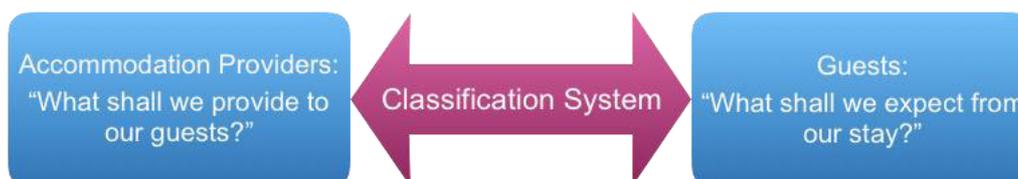
- In Kazakhstan: Kazakh Tourism or the Tourism Industry Committee of the Ministry of Culture and Sports.
 - In the Kyrgyz Republic: Kyrgyz Tourism or the Department of Tourism under the Ministry of Economy and Finance
222. This approach is deemed to represent **the most realistic solution** for both countries considering the available resources and economic limitations of all involved organizations. There needs to be an **initial investment** in the organization selected as National ACS Operator **regarding staffing and staff training**, so that people who will be assigned with managing and administering the classification project will gain the necessary skill set.
223. The two National ACS Operators will closely work together through a **Transborder Steering Committee** handling joint topics such as changes to the classification standards, variations from standards to be allowed in each country, intellectual property rights to the ratings (stars or any other rating symbols) and similar transnational needs. The steering committee should at least include one representative from each National ACS Operator and one industry association from each country. Representatives of other Central Asian countries could, at a later stage and upon stated interest, be invited to attend as observers.
224. Both National ACS Operators should also ask the HSU for observer status and participate in industry meetings together with classification operators from other countries to keep up to date with crucial developments in the industry.

⁴⁹ There was no consensus among stakeholder during the two rounds of stakeholder consultation about the most suitable operator of the new joint ACS. Opinions were quite varied, with a small majority of stakeholders clearly in favour of the present recommendation and others opposing it while recommending other solutions such as assigning the role of the ACS operator to industry associations, to a new special-purpose entity or to the private sector in general. By taking all factors into consideration, the appointment of a tourism-related government agency as national ACS operator appears as the most feasible and realistic option, and therefore this option is being recommended herein.

4.4 Key Characteristics and Values of the New Joint ACS

225. The new joint ACS is about properly **managing guest expectations**. All users of the system should be aware of what the system ratings stand for, so that guests know what minimum standards to expect when paying for an accommodation. Likewise, accommodation providers should be aware of their obligations towards guests. The ACS can be considered successful when the questions posted in Exhibit 4.4-1 can be clearly answered by the system's users.

Exhibit 4.4-1: The mediating role of an accommodation classification system between providers and guests



226. The new joint ACS should be **voluntary** for accommodation providers, a decision that is in line with both international practices and the findings from stakeholder interviews. Such a move comes with two prerequisites:

- **Separating the licensing of an accommodation business (such as a hotel or a campsite) from the classification process.** In the first case (licensing), the business must adhere to minimum standards that apply to any hospitality business regardless of class (such as fire safety and sanitary requirements, bedding, etc.). *After receiving a license* (usually from a government agency), a business should have the freedom to decide whether to apply to the National ACS Operator for the official classification or operate as an unclassified business (for example, a hotel without stars). This separation of licensing from classification is already the case in the two countries and should be upheld.⁵⁰
- **Legally restricting the use of hotel stars or other ratings like the official classification categories.** Presently, hotel stars are widely abused by their unauthorized use, a situation that strongly undermines the successful launch of the new joint ACS. National ACS Operators shall be furnished with the exclusive right to issue hotel stars and similar as each country's official rating. **Accommodations should be allowed to use stars or similar ratings only after successfully completing classification** or else they shall not be able to use these symbols on their website, in their signage, in OTA listings and similar.

227. The new joint ACS is **about the future** of the hospitality industry in Kazakhstan and the Kyrgyz Republic and not about past approaches to accommodation classification. It should provide a clear direction to the sector about how accommodation should evolve over the next 15 to 20 years by encouraging:

- The gradual upgrade of accommodation businesses by adapting classification standards to modern guest requirements.
- Sustainability during both construction and operation of an accommodation business.
- Strong *sense of place* by incorporating elements of local culture and nature in the

⁵⁰ Stakeholders pointed out that in the Kyrgyz Republic, licensing is not necessary, at all, as it has been canceled in the field of tourism in accordance with the Law "On Amendments to the Law of the Kyrgyz Republic on Tourism" dated October 21, 2003 (No. 218).

- guest experience – from the décor to the breakfast served – either in a traditional or in a more creative and modern way.
- Inclusiveness of guests with reduced mobility (by offering them better accessibility) or with special requirements, such as dietary needs like vegetarian, vegan, gluten-free, lactose-free, halal, kosher, low-fat, low-sodium, anti-allergenic etc.
 - Social responsibility initiatives aimed at the wellbeing of staff and the local community; for instance, offering decent working conditions (e.g., staff lockers, staff dining area) or a food waste elimination programme, are examples of what could be included as criteria in the new classification system.
228. The new joint ACS should be **future proof**, meaning that the system’s usefulness, validity, and applicability can be maintained throughout time. Ways of achieving this includes:
- Flexibility of the system by design. This can be accomplished through the customization of the ACS according to each country’s unique needs and characteristics; the regular revision of classification criteria and processes every three years based on input by all stakeholders; the possibility of the Transborder Steering Committee to amend any part of the ACS earlier than the regular review if such a need arises.
 - Introduction of points-based classification criteria as an added layer of flexibility. Instead of forcing accommodation providers to adhere to Rules A, B and C to reach, for instance, three-star status, they will have the liberty of collecting the required number of points by individually selecting from a criteria list.
 - Allowing and even encouraging the creativity inherent to the accommodation sector. New accommodation concepts keep appearing and the system should be able to accommodate them as long as they are fully functional and represent hospitality experiences of high quality. These concepts range from boutique hotels to design hostels to glamping (luxury camping) and require the uncluttering of the classification system by removing rules that do not add any value to the guest experience yet represent a large burden to the business (e.g., requiring five-star hotels to provide ballrooms or other public spaces). This is especially the case when repurposing a building as an accommodation business and facing the space constraints that usually come with such an undertaking.
229. The new joint ACS should be reliable and trusted by the industry. **Trust** can be achieved in the following ways:
- Keeping the system as simple as possible, easy to understand and easy to implement.
 - Transparency by being open about the rules and the operators’ decisions, by publicising the businesses that have completed classification and similar incentives.
 - Consistency by applying the classification standards in the same way to all businesses throughout the country, thus ensuring objectivity and independence from any outside influence.
 - Integrity and fairness of all people involved in the classification process by avoiding any potential conflicts of interest.
230. The new joint ACS should mean **good business** for accommodation providers by:
- Encouraging business owners to adapt to present and future guest requirements.
 - Providing guidance on what kind of services and experiences are needed for charging higher prices.
 - Aggressively marketing the new classification system to ensure quality assurance.

5. Proposed Accommodation Typology

231. As shown in Annex A2, there is quite a variety of accommodation types on the market. A key decision to be made applies to the inclusion / exclusion of accommodation types within the new joint ACS. The present chapter provides the framework for taking such a decision in an informed way based on currently used typology and modern ACS requirements.

5.1 Accommodation Types

232. Chapter 1 and Annex A2 discuss the types of accommodation currently in use in the two countries, be this either for statistical purposes or as defined in the national ACS. An overview of these accommodation types is presented in Table 5.1-1.

Table 5.1-1: Accommodation types currently in use in Kazakhstan and the Kyrgyz Republic

Accommodation types mentioned in the current ACS		Accommodation types used for statistical purposes	
Kazakhstan	Kyrgyz Republic	Kazakhstan	Kyrgyz Republic
<ul style="list-style-type: none"> • Hotels • Motels • Campsites • Tourist camps • Guest houses • Rest houses • Boarding houses • Other buildings and facilities used for the accommodation of tourists and their service 	<ul style="list-style-type: none"> • Hotels • Motels 	<ul style="list-style-type: none"> • Hotel with restaurant • Hotel without restaurant • Motel • Recreation boarding house • Kid's camp • One-storey bungalows, country houses (chalets), cottages, small houses, and apartments • Trailer parks, entertainment towns, hunting and fishing grounds for short-term accommodation • Camping • Tourist base • Rest House • Tourist camp • Hostels 	<p><i>Collective accommodation facilities for tourists</i></p> <ul style="list-style-type: none"> • Hotels • Similar accommodation (guesthouses, furnished rooms, tourist hostels etc., consisting of a room and provide limited hotel services) • Wellness facilities • Labor and rest camps • Recreational dwellings • Campsites <p><i>Individual accommodation facilities for tourists</i></p> <ul style="list-style-type: none"> • Own dwellings • Rented rooms in family houses • Residences rented from individuals or agencies

233. **A crucial decision for the new joint ACS is which accommodation types to include for classification.** Not all accommodation types need to be classified in distinct categories, as is the case with kid's camps or trailer parks, whereas travellers expect star ratings at hotels.

234. The following **accommodation types are being proposed for inclusion** in the new joint ACS:⁵¹

⁵¹ The initial recommendation also included **yurt camps** as one of the accommodation types to be covered by the new ACS. The yurts of Kazakhstan and the Kyrgyz Republic are of particular cultural importance as they have been included in [UNESCO's Representative List of the Intangible Cultural Heritage of Humanity](#). Yurts are traditionally made of natural materials; however, yurt camps and

- Hotels (incl. hotel types such as motels).
 - Guesthouses.
 - Hostels.
 - Campsites.
235. **Additional accommodation types** can be added over the course of time by the partner organizations of the new joint ACS. As an example, self-catering apartments and houses (such as bungalows, cottages, chalets, villas etc.), bed & breakfasts (i.e., furnished rooms in private residences), sanatoria and other types considered relevant could be included.
236. Below is a list of legally defined accommodation types with their respective definitions, as is currently in use in the two countries. As mentioned in Chapter 1, the types of accommodation classification that currently exist in Kazakhstan are **not legally defined**, neither in the main Law nor in the Tourist Accommodation Classification Rules. The only information provided is that a hotel or motel should have a capacity of at least 10 rooms.
- **Hotels and motels:** The current Kyrgyz ACS defines a hotel as “an enterprise intended for temporary residence.” A motel is “a hotel located near a motorway.” As in the case of Kazakhstan, hotels and motels have a capacity of at least 10 rooms and are classified in categories from 1 to 5 stars (motels receive up to four stars).
 - **Hostels:** A definition of hostels can be found in the National Standard of the Republic of Kazakhstan 2847-2016 “*Accommodation services. General requirements for hostels*”. According to this standard, a hostel is “an economical accommodation facility intended for temporary accommodation, mainly for low-budget tourism, with rooms of various capacities and bathrooms, usually outside the room, as well as premises (zones, places) for guests to communicate”. A law from 2019 is allowing the operation of hostels either in their own dedicated building or in a shared building if they have their own separate entrance.
 - **Guesthouses:** According to the National Standard of the Republic of Kazakhstan 2851-2016 “Tourist and excursion service. Guest houses. General requirements”, a guesthouse is defined as “a small, specialized place (facility) of accommodation (often family), located within a village or in small towns, providing guests with temporary accommodation services, as well as additional services for organizing leisure, catering, excursions and others”. Guesthouses in villages may include private households, mini-hotels, condominiums or rooms of individual homeowners, houses of a fisherman or hunter, and other small accommodation facilities suitable for short-term accommodation and catering for guests.
237. Additional definitions corresponding to the aforementioned accommodation types can be found in the State Standard of the Republic of Kazakhstan BS EN ISO 18513:2003 titled “*Tourism services. Hotels and other types of tourism accommodation. Terminology, IDT*”:
- Hotel: an establishment with a reception, services, and additional amenities, where accommodation and, in most cases, meals are available.
 - Motel: a hotel with parking just steps away, designed to lure car enthusiasts.
 - Guesthouse: an establishment, often located in a rural area, with food and drink

yurt towns have been built by using modern building materials such as iron, plastic, and concrete, thus altering the original character of this national symbol. These accommodation types (i.e., yurt camps and yurt towns) are campsites and bungalow complexes resembling the traditional dwellings. Due to the special status and the cultural significance of yurts, the inclusion of yurt camps and yurt towns as a distinct accommodation category in the new classification system shall be decided after further analysis and an on-site assessment of a sample of such establishments.

offered, where accommodation is also provided.

- Youth Hostel: an establishment, usually operated by a non-profit organization, where an accommodation is provided with limited catering and/or self-catering, and other facilities, services, programs, and activities are foreseen as a basis for non-formal education and recreational purposes, primarily for young people.
- Camping site/ Caravan park/ Holiday park/ Touring camp/ Touring park: a designated area with a bathroom that provides any of the following forms of accommodation: tents, caravans, campervans, chalets, bungalows, with and without entertainment and sports facilities, shops and restaurants.

5.2 Room Types

238. The main product sold by accommodation businesses is a private space for the guest to use. It may just be a bed in the case of a dormitory-like hostel or a multi-bedroom luxury villa.

239. Depending on the type of business, this private space takes one of the following forms:

- Room: An enclosed space with a locking door featuring one or more beds, additional furniture such as seats and a table, proper lighting, heating, and ventilation, (opening) window and/or terrace as well as sanitary facilities such as a sink or a full bath with at least three fixtures (sink, WC and either a bathtub or a shower).
- Suite: An enclosed space with a locking door comprising at least two rooms – one bedroom and one living/dining room – with an attached bathroom. Suites may be larger by including two or more bedrooms or a separate living and dining room and may also be more luxurious by having additional features such as private pool or entertainment electronics.
- Junior Suite: a single space larger than a typical room that, in addition to the beds, also has a distinct living/dining space (such as a sofa or a dining table).
- Apartment: An enclosed space with a locking door comprising at least two rooms – one bedroom and one living/dining room – with an attached bathroom as well as added cooking facilities (kitchen or kitchenette), allowing guests to prepare their own meals.
- Studio: A space like a room or a junior suite with added cooking facilities (kitchen or kitchenette), allowing guests to prepare their own meals.

240. The room types as currently used in the present ACSs of the two countries are somehow confusing – especially regarding the suite/ lux distinction – and it would be best to employ the above definitions for the international market.

6. Classification Criteria

241. As discussed in previous chapters, accommodation classification systems (ACSs) need to deal with two dichotomies:
- Hardware vs. software.
 - Objective criteria vs. subjective criteria.
242. The first dichotomy reflects the transition from older ACSs to more experience-oriented systems. The present ACSs of Kazakhstan and the Kyrgyz Republic are mostly limited to evaluating the “*hardware*” dimension of accommodations such as buildings and facilities. More recent systems, however, are also including and even prioritizing “*software*” related criteria that define the customer experience. Thus, **there is a clear shift in an ACS’s focus from accommodation facilities to customer experience and service quality**, which makes it necessary to include criteria that determine the services being offered. As time progresses, the balance is slowly tilting in favour of services. Such requirements have gained in weight in recently updated ACSs on a global scale. A similar approach is also being recommended for the new joint ACS of Kazakhstan and the Kyrgyz Republic, as this renewed focus on services will provide guidance to accommodation providers on how to improve the customer experience.

Exhibit 6-1: Finding the right balance between criteria assessing the facilities an accommodation is offering and its services



243. The second dichotomy reflects the ongoing “struggle” between official classification on the one hand and **guest review and rating platforms**, such as TripAdvisor, social media and the OTAs, on the other. As discussed in previous chapters, guest reviews are a vast collection of individual ratings made in a totally subjective manner, whereas an official classification represents the assessment of accommodation establishments in an objective way. Interviewed classification experts agree that those two approaches should be seen as being complementary to each other and that both are useful to travellers. Some ACSs have already attempted or are currently planning to incorporate input from guest scores into their classification criteria. Considering, however, the limited international experience of such an approach, it is not recommended to include guest scores in the classification algorithm. The recommendation is **to utilize guest ratings only as an early-warning system** in case there is a significant drop in the score of a particular accommodation, thus triggering the re-evaluation of that business. Thus, constant monitoring by the chosen authorities is considered essential.
244. This clear distinction between measuring objective criteria and collecting subjective opinions is the basis of the present project: **The new joint ACS aims at objectively and verifiably assessing the customer experience offered by each accommodation business regarding both its facilities and its services.**

6.1 About stars and other symbols

245. As has been previously discussed, stars are the dominant type of classification for hotels, whereas other accommodation types have been internationally classified by using a variety of symbols in addition to stars, such as keys, flowers, or apples.
246. In line with international practices, the new joint ACS will use stars for classifying hotels by using the well-established one- to five-star ratings. Hotel stars are a universally known rating symbol and are well understood by most travellers.
247. For the avoidance of any confusion with hotels and of any expectations of hotel-level services and amenities, a different classification symbol will be used for other types of accommodation. Based on recommendations made by stakeholders, the symbol of the shanyrak (in Kazakhstan) or the tunduk (in the Kyrgyz Republic) is being proposed for this purpose. The use of this symbol clearly signals to the market that classified businesses are non-hotel accommodation.
248. The shanyrak/tunduk is the centrepiece of a yurt's roof and is a direct reference to the deeply ingrained tradition of hospitality in both countries. Kazakhstan is using the shanyrak as its national emblem, whereas the tunduk features prominently on the flag of the Kyrgyz Republic (see Exhibit 6.1-1). The shanyrak/tunduk symbol to be used in the classification system will be designed in such a way that there is no resemblance and confusion neither with the emblem of Kazakhstan nor the flag of the Kyrgyz Republic

Exhibit 6.1-1: The symbol of the shanyrak/tunduk



The roof of a yurt



Emblem of Kazakhstan



Flag of the Kyrgyz Republic

249. The proposed classification categories are being shown in Table 6.1-1.

Table 6.1-1: Proposed classification categories per accommodation type

Accommodation type	Classification categories				
Hotels (incl. hotel types such as motels)	★	★★	★★★	★★★★	★★★★★
Guesthouses	⊗	⊗⊗	⊗⊗⊗	⊗⊗⊗⊗	
Hostels	⊗	⊗⊗	⊗⊗⊗	⊗⊗⊗⊗	
Campsites	⊗	⊗⊗	⊗⊗⊗	⊗⊗⊗⊗	

250. In accordance with international best practices, an additional distinction is being proposed for those accommodation establishments that provide significantly more facilities, amenities and services than is required by their rating. In several countries this distinction comes in several forms such as “3 Stars Superior” or “4 Stars Plus” or “5 Star Premium” or “5 Star Palace Hotel” etc. The recommendation is for the “**Elite**” designation to be given to businesses exceeding the minimum number of points required by their respective category by at least 40% (e.g., “**5 Star Elite Hotel**” or “**3 Shanyrak Elite Guesthouse**”).

251. A final comment shall be made about so called **en-suite guest rooms** at hotels and other accommodations. From a guest perspective, **the most crucial classification criterion is the existence of a private bathroom**. Rooms with shared bathrooms should be an option **only for one-star hotels and guesthouses**, considering that at the international level two-star hotels are expected to provide three-fixture bathrooms, i.e., private bathrooms equipped with sink, flush toilet (WC) and either a bathtub or a shower.
252. **No new accommodation business shall be granted a one-star classification**. There should be plans **to gradually phase out the one-star rating for hotels** by providing guidance and incentives to existing one-star establishments to upgrade.

6.2 Types of classification criteria

253. Following the example of most recent ACSs internationally, classification criteria are being distinguished as follows:
- Mandatory criteria.
 - Optional criteria, with each fulfilled criterion yielding several points.
254. An accommodation will be classified in the respective category if it fulfills the mandatory criteria and at the same time secures a minimum number of points through optional criteria. This provides accommodation providers with the **flexibility** to decide how they want to collect points based on the needs of their guests and the character of their business.
255. The same criterion may be at the same time mandatory and optional depending on the category. For instance, room service is mandatory for five-star hotels. For three-star hotels, however, it is not a mandatory requirement, so – if fulfilled – the assessed hotel would secure additional points.
256. The following example from the HSU shows how this works (see Exhibit 6.2-1): The availability of an umbrella at the reception or in the room is mandatory for hotels with three or more stars. However, if a one- or two-star hotel is offering an umbrella to its guests, it receives three points (according to HSU criteria, a one-star hotel needs to collect 95 points, a two-star hotel should reach 180 points etc. – see Exhibit 6.2-2).

Exhibit 6.2-1: Mandatory vs. optional classification criteria used by Hotelstars Union

(Source: https://www.hotelstars.eu/fileadmin/Dateien/PORTAL_HSU/Kriterienkataloge/Hotelstars_Union_Classification_Criteria_2020_-_2025.pdf)



Area	No.	Criterion	Points	★	★★	★★★	★★★★	★★★★★
Miscellaneous	44	Umbrella at the reception or in the room	3			M	M	M
	45	Up-to-date media in the room (printed or digital) ¹¹	3					M
	46	Sewing service	3					M
	47	Sewing kit on demand	1		M	M	M	
	48	Sewing kit in the room	3					M

Exhibit 6.2-2: Minimum number of points per hotel star category according to Hotelstars Union

(Source: https://www.hotelstars.eu/fileadmin/Dateien/PORTAL_HSU/Kriterienkataloge/Hotelstars_Union_Classification_Criteria_2020_-_2025.pdf)



Area	No.	Criterion	Points	★	★★	★★★	★★★★	★★★★★
VIII. Minimum Points⁶⁰								
Hotels				95	180	270	410	610

6.3 Main categories of classification criteria

257. Table 6.3-1 includes the topics that the classification criteria catalogue should cover. This is **a maximum list covering all criteria categories for all accommodation types**. Upon finalising this maximum list at a later stage following pilot inspections, **it will be adapted to the requirements of each accommodation type (hotel, guesthouse, hostel etc.) by removing any irrelevant classification criteria**.

258. Each criteria category includes both mandatory and optional criteria.

Table 6.3-1: Joint criteria categories for all accommodation types (hotels, guesthouses, hostels, campsites, and yurt camps)

No.	Criteria Category	Examples of criteria
1	Staffing and working conditions	Staff number, staff training, minimum qualifications and skill certification, languages spoken etc. Staff restaurant, locker and shower facilities, uniforms, and name badges etc.
2	Surrounding area	Landscaping, parking space, lighting etc.
3	Character of accommodation and maintenance	Heritage building, traditional housing, special architectural features, boutique hotel, resort location, level of maintenance, sound insulation of public spaces etc.
4	Building exterior	State of the façade, signboard etc.
5	Entrance	Weather protection for arriving vehicles, sufficient space for busses to approach, air curtain etc.
6	Fire safety, security, and emergencies	Fire detectors, sprinklers and extinguishers, emergency exits, emergency lighting, closed-circuit TV at entrance points etc.
7	Power and water supply	Power generator, water treatment plant, safety of drinking water etc.
8	HVAC (heating, ventilation, air-conditioning)	Air-conditioning and heating in public spaces and guest rooms, clean air provision etc.
9	Telecommunications, Internet connection and web presence	Telephone services, Wi-Fi and wired Internet access, coverage of the building (guest rooms and public spaces), dedicated website with a minimum of features, online booking option etc.
10	Stairs, elevators, and corridors	Number and capacity of elevators, service elevators, corridor width etc.
11	Required room types	Rooms, suites, wheelchair-accessible rooms etc.
12	Bedrooms	Size, furniture, closet, equipment, power sockets, window treatments, sound insulation, balcony or terrace, child-friendly appointments etc.
13	Sleep experience	Bedding, pillow options, size and treatment of mattresses, bed linens, black-out curtains, soundproofing etc.
14	Bathrooms	Size, fixtures, mirror, lighting, ventilation, towels, toiletries etc.

No.	Criteria Category	Examples of criteria
15	Reception	Hours of operation, online check-in/check-out options, range of services, safe deposit boxes, luggage handling, luggage storage, currency exchange, taxi call, concierge services etc.
16	Lobby	Size, seating, workspace etc.
17	Public toilets	Capacity and size, facilities, amenities etc.
18	Hygiene, safety, and cleanliness	Hygiene and cleaning protocols in guest rooms and public spaces, electronic and touchless service delivery, doctor on call
19	Housekeeping	Daily cleaning procedure, frequency of linen change, evening turndown etc.
20	Laundry service	Types of cleaning, time of delivery, ironing, shoe-shining service etc.
21	Recreational amenities	Indoor pool, outdoor (heated) pool, spa, gym, sauna, sports, indoor and outdoor playground, beach facilities etc.
22	Recreational activities	Horseback riding, bicycling, hiking, falconry, cultural activities etc.
23	Restaurant	Hours of operation, size and capacity, special dietary requirements (halal, vegan etc.), child-friendly arrangements, food safety rules (HACCP) etc.
24	Bar	Hours of operation, service provided etc.
25	Other food & beverage outlets	Hours of operation, service provided etc.
26	Function space (meeting room, banquet room etc.)	Size and capacity, equipment, technical features etc.
27	Room service	Hours of operation, food, and beverage options etc.
28	Other departments	Hairdresser, shop, casino etc.
29	Parking	Outdoor parking or indoor garage, size and capacity of parking space, lighting, shading, valet parking etc.
30	Accessibility	Ramps, front desk height, width of elevator and door, accessible guest rooms, accessible public bathrooms etc.
31	Sustainability	Energy and water consumption, recycling, waste-water treatment, change of linen upon demand, use of locally produced products, environmental certification etc.
32	Guest information	Detailed directions, guest information about the establishment and the destination (in print or online), requesting guest feedback (e.g., through a questionnaire)

Table 6.3-2: Additional criteria categories for hostels

No.	Criteria Category	Examples of criteria
33	Dormitories	Bedding, lockers, linens etc.
34	Shared bathroom facilities	Shower facilities for men and women, toilets etc.

Table 6.3-3: Additional criteria categories for campsites

No.	Criteria Category	Examples of criteria
35	Camping options	Tents and caravan pits, caravans, yurts, bungalows etc.
36	Shared bathroom facilities	Shower facilities for men and women, toilets etc.

7. Main Classification System Components

259. Classification criteria, as discussed in the previous chapter, represent just one dimension of an accommodation classification system (ACS). Such a system comprises additional elements:

- Administering applications submitted by accommodation businesses.
- Inspectors and onsite inspection.
- Re-evaluation of classification assessments.
- Committees and code of conduct.
- Marketing and communicating the ACS.
- Supporting accommodation businesses.
- A management structure.

260. These elements will be analysed in more detail in the present chapter.

7.1 Administering applications submitted by accommodation businesses

261. As has been previously recommended, the new joint ACS should be a voluntary system, meaning that the classification of an accommodation establishment will commence once the **National ACS Operator** (see Chapter 4.3) receives an application from the interested business.

262. An **application administration database** should be in place with an **online application submission form** for accommodation operators to fill in. This submission form will provide input to some of the database's fields, whereas the remaining fields will be completed by the administrative staff of the National ACS Operator and the inspectors.

263. After the application has been submitted through the online submission form, an administrator of the National ACS Operator will be responsible for initiating **the classification** of the respective accommodation establishment. The administrator is expected to perform the following duties:

- Check the application for accuracy and missing data and communicate with the applicant accordingly.
- Fill in any required additional data.
- Assign inspectors who will make the onsite assessment of the establishment.
- Schedule the inspection.

264. The application administration database will also include the outcome of the classification process, that is, the completed online inspection checklist that will be electronically submitted by the inspectors and their recommendation as to the rating of the applicant's accommodation establishment.

265. The administrator will conclude the process by completing the following steps:

- Check the inspection results for validity.
- Inform the applicant of the classification outcome.
- Send out the **classification certificate** with the accommodation establishment's official rating and its expiration date.

266. Upon completion of the classification process, the application administration database will automatically feed the required information into the official database of classified accommodation establishments and the respective website.
267. This procedure will require the following **software and application elements**:
- Element 1: Application administration database (“incoming data set”).
 - Element 2: Official database of classified accommodation establishments (“outgoing data set” utilizing all data from Element 1).
 - Element 3: Website of the ACS comprising:
 - Online application submission form (feeding into Element 1).
 - Dynamic list of officially classified accommodation establishments (with a feed from Element 2) with an “Accommodation Finder” functionality based on several search criteria (location on map, accommodation types, ratings, amenities, and keywords).
 - Element 4: Online inspection checklist (with password-protected access through the inspectors’ tablets) feeding into Element 1.
 - Element 5: Email automation software connected to Element 1 for easy and automated communication between applying accommodation businesses and the ACS administrators.
 - Element 6: Self-assessment form connected to Element 3. Before submitting their online application submission form, applicants can use the self-assessment form to have immediate feedback about the most probable rating they will receive based on the data they will fill in about their establishment’s technical and functional characteristics.

7.2 Inspectors, onsite inspections, and classification costs

268. In addition to its administrative staff, the National ACS Operator of each country should also employ the required number of inspectors; that is, the people in charge of assessing the compliance of accommodation establishments with the classification criteria. With the launch of the new joint ACS, a **body of inspectors** should be formed, thus creating a pool of properly selected and trained assessors.
269. The National ACS Operator can consider three potential options for employing inspectors:
- Part-time or full-time employment.
 - Freelance/outside contractors.
 - Outsourcing inspections to accredited certification bodies, which will supply the needed inspectors.
270. Based on international experience, the second option is being recommended.
271. Inspectors should have a **background** in hospitality and the service industry and be able to provide guidance and advice to accommodation businesses. Certification bodies, i.e., companies and other organisations in charge of conducting certifications of all sorts, tend to employ inspectors with a background in engineering. Even though these inspectors may be highly experienced in making assessments according to ISO and other standards, they have the wrong background for accommodation classification.
272. Inspectors must undergo proper **training** to be able to perform their duties with accuracy and professionalism. Their training should cover the following topics:
- The principles and detailed classification criteria of the ACS.

- User instructions for the online inspection checklist.
 - Conducting online background checks on the company website, on TripAdvisor and similar outlets before actual inspection.
 - Conducting site inspections of accommodation businesses in accordance with the code of conduct of the ACS.
 - Providing guidance and advice to accommodation businesses.
 - For a small number of inspectors: Conducting mystery guest inspections.
273. Regular inspections can be either **announced or unannounced**. Based on feedback from stakeholders, announced inspections by prior appointment is being recommended. Inspections should cover not just the public spaces of an accommodation, but also a predefined sample of guestrooms depending on the overall number of rooms and the room categories on offer.
274. Before visiting an accommodation establishment, inspectors are required to conduct a brief **background check** on the applicant’s website and assess guest reviews for potential weaknesses, misleading information and similar.
275. In the case of **accommodation establishments** interested in the “Elite” designation (see Chapter 6.1), it is recommended to assess them through an additional **mystery guest inspection**. Based on the score from the initial inspection, an accommodation operator can then apply for an additional mystery guest inspection to receive the “Elite” designation. Mystery guest inspections are unannounced visits by inspectors who book their room and stay at each accommodation establishment incognito as normal guests without revealing that they are there to assess the business. This type of assessment has a higher cost due to the increased time spent on each inspection. However, it will significantly boost the status of the businesses carrying the “Elite” designation. Mystery guest inspectors must undergo additional onsite training and adhere to strict ethic rules as described in the code of conduct.
276. Apart from mystery guest inspections based on international best-practices, it is recommended that inspections be conducted by two people instead of one. Despite the increased cost, this will ensure a higher level of integrity and accuracy in the classification process.⁵²
277. **Inspection costs** – for both regular and mystery guest inspections – shall be borne by accommodation establishments applying for classification. These costs comprise the remuneration of inspectors and their travel expenses. With proper scheduling, an inspector or an inspection team can assess between two and four accommodation businesses per day, depending, of course, on their size and type, and the distance between them. Inspectors would also need to spend some time (about one hour per business) for desk research *before* the on-site inspection. Larger and more upscale establishments will require more time to inspect and, thus, will be more costly. Mystery guest inspections entail higher costs, as each inspection will require between one and two days. However, as previously mentioned, they add to the prestige of the “Elite” designation and are a major marketing element for the ACS.
278. **Classification costs** can be analyzed as follows:
- Cost of the on-site inspection (approx. 2-4 hours for small and mid-sized accommodation businesses, more time for larger businesses, one or two full days)

⁵² Several stakeholders insisted on hiring three inspectors – instead of two – for the assessment of each accommodation establishment, as this will increase the credibility of the whole process. However, considering the significantly higher cost associated with employing three inspectors per assessment, the recommendation remains for two inspectors.

in the case of mystery guest inspections). In case of teams of two inspectors, the cost shall be calculated accordingly.

- Cost of desk research to be conducted by the inspector *before* the on-site inspection (about 1 hour for going through the business's website and online reviews).
- Travel costs of inspectors.
- Administrative cost, i.e., a contribution towards the operating costs of the National ACS Operator's head office.
- Cost for producing a plaque – i.e., the ACS's official sign – to be prominently displayed in the entrance area of the certified business (see Exhibit 7.2-1 for some examples).

Exhibit 7.2-1: Examples of accommodation classification plaques from Germany and Greece



279. These cost items should be calculated by each National ACS Operator so that the price list of accommodation classification can be prepared. The amount to be paid by each business will depend on its type, size (i.e., number of rooms or beds) and range of facilities such as restaurants, spas, ballrooms, sports facilities and similar.
280. Alternatively, instead of having accommodation businesses pay for their classification, a dedicated **tax** – such as a bed tax – can be considered for financing all ACS costs, as proposed by several stakeholders. Internationally, several versions of accommodation-related taxes such as bed taxes, visitor taxes etc. are being applied. These taxes finance a variety of local, regional or national government activities such as tourism development, destination marketing and management, DMO operations and the like.
281. It is recommended that government agencies in both countries check whether inspection costs can be initially **subsidized**, at least for the first round of inspections and/or for businesses applying up to a specific deadline. This would be a strong incentive for accommodation businesses to apply for classification.

7.3 Re-evaluation of classification assessments

282. The recommendation for the new joint ACS is to set the validity period of the official classification at **three years**.⁵³ This means that each business will need to be re-evaluated and re-inspected every three years. Each business's **classification certificate** will indicate its expiration date and the ACS should notify classified businesses about the pending expiration six months in advance, so that they can apply

⁵³ Most stakeholders agree on a re-evaluation every three years. Some stakeholders insisted on repeating the inspections every two years.

for their re-evaluation in a timely manner. These notifications can be automated.

283. While it is recommended that all classified businesses be inspected every three years, inspections can be triggered at an earlier stage if, for example, **customer complaints** are submitted on the ACS website and/or if there is a **significant drop in guest ratings** on platforms such as TripAdvisor, Booking.com, or Google.
284. Several operators of official national classification systems from around the world are working with **guest review aggregators** such as TrustYou, Revinat and ReviewPro, who provide monitoring tools and sentiment analyses that allow for the identification of any potential problems related to underperforming businesses. As a valuable **early-warning resource**, it is recommended that the two National ACS Operators establish a close working relation with review aggregators popular within their respective country.

7.4 Committees and code of conduct

285. The launch of new the joint ACS requires activation of the following committees:
 - **Transborder Steering Committee:** As discussed in Chapter 4, the National ACS Operators of Kazakhstan and the Kyrgyz Republic will be expected to work closely together through a Transborder Steering Committee. The Committee will assess joint topics such as classification standards modifications, standard variations between the two countries, intellectual property rights, and applicable ratings (stars or any other rating symbols). The Steering Committee should include, as a minimum, one representative from each National ACS Operator and one industry association representative from each country.
 - **National Classification Committee:** Both countries should establish a National Classification Committee capable of providing advice and monitoring the work of the National ACS Operators. Ideally, it shall consist of up to seven members representing both government agencies and industry associations.
 - **Ethics and Appeals Committee:** This committee shall handle complaints against (1) classified businesses, (2) inspectors and administrative staff of the National ACS Operator, as well as (3) members of the two committees. The Ethics and Appeals Committee is also to handle appeals against an establishment's classification, submitted either by the establishment itself or by any other third party (another accommodation business, government agency, customers, etc.). It should ideally comprise three members, one representative from the National ACS Operator, one from a tourism-related government agency and one from an industry association.
286. Of same importance is the preparation of the classification system's **Code of Conduct**. This document will include concrete guidelines for all parties involved in accommodation classification:
 - Accommodation providers.
 - Inspectors and administrative staff of the National ACS Operator.
 - Committee members.

7.5 Marketing and communicating the ACS

287. Communicating the joint ACS to both the domestic and international market is a crucial task in launching and establishing the new system. Marketing of the ACS should focus on the quality assurance it provides to travellers, especially regarding value for money.
288. The joint ACS can be promoted as a new quality initiative for the Kazakh and Kyrgyz accommodation sector. Press trips to the two countries combined with press releases,

social media content and an awards programme can be implemented by the tourism authorities of both countries.

289. The official website of the ACS will also be an effective marketing tool, as it will offer a detailed description of each accommodation business and, thus, be a useful resource for both travellers and the travel trade.

7.6 Supporting accommodation businesses

290. Participation of accommodation establishments in the new joint ACS will depend upon incentives offered by the Governments of Kazakhstan and the Kyrgyz Republic. Apart from **subsidizing the cost of inspections**, additional incentives could include tax incentives, marketing assistance and similar.
291. Stakeholders expressed their preference for tax breaks and stressed that the inclusion of classified businesses in each country's official accommodation register will be a strong motivator for operators to apply for classification. Accommodation businesses with good ratings on guest review platforms may also be rewarded with a discount for their classification.
292. The launch of the new joint ACS should be accompanied by **training programmes** that not only analyze the classification criteria, but also focus on educating accommodation entrepreneurs on how to better understand present and future guest requirements, and on how to improve overall service quality. Training and **mentoring programmes** will be particularly helpful in providing guidance on what kind of hospitality services and experiences are needed for **improving value for money** and **charging higher room rates**.
293. Ideally, the introduction of the joint ACS would be combined with investment incentives and access to more attractive financing terms, so that businesses could upgrade before receiving their new rating.

7.7 Management structure of each National ACS Operator

294. It has been recommended in Chapter 4.3 to appoint a government agency as National ACS Operator. Based on this recommendation, the following management structure will be required to be set up in both countries as part of an existing government agency. This could take the form either of a task force/working group or a new **department**, with the latter being the recommended option.
295. The management structure comprises three elements, the Head Office, the Body of Inspectors, and the Committees as described in Chapter 7.4:
- **Head Office** of the National ACS Operator
 - Office Manager (coordinating staff and accounting).
 - Classification Administrators (between 3 and 5 officers handling every aspect of the classification process, from incoming applications by accommodation businesses to sending out classification certificates upon completion of the classification as described in Chapter 7.1).
 - Inspection Coordinator (contracting and remunerating inspectors; assigning inspectors to accommodation businesses which have applied for classification; coordinating each inspector's schedule for better usage of their time during field missions and for minimizing travel costs per inspection).
 - Communication Officer (content management of the ACS's website and social presence; preparing and distributing press releases; working with other government agencies and industry associations for organising press trips and

fam trips).

- IT Administrator (in charge of all software and application elements as described in Chapter 7.1).
- Accommodation Support Officer (providing information to accommodation operators about operating standards, funding options, advice for service improvement, organising training activities etc.) – *This task can also be assigned to another department or agency.*

- **Body of Inspectors**

- A pool of specially trained outside contractors who will be assigned the onsite assessment of all accommodation businesses applying for classification (see Chapter 7.2 for details). One full-time inspector can cover up to 400 accommodation establishments per year (mostly small and mid-sized businesses). As most inspectors usually work part-time on accommodation classification, an average output of approx. 150 assessments per inspector per year should be expected. Thus, for every 1,000 accommodation establishments to be assessed over a three-year period, 2.2 inspectors will be needed, meaning that a pool of three trained free-lance inspectors per 1,000 businesses will suffice for such an assignment.

- **Committees** (see Chapter 7.4 for details)

- Transborder Steering Committee (4 members).
- National Classification Committee (up to 7 members).
- Ethics and Appeals Committee (3 members).

296. Both the Head Office and the Committees should have access to the services of a **legal counsel**.

8. Action Plan for the Implementation of the Joint ACS

297. The present chapter explores some final practical issues concerning the transition from the current to the new joint accommodation classification system (ACS) in Kazakhstan and the Kyrgyz Republic. The chapter outlines necessary implementation steps that would need to be taken over the next twelve months, in addition to relevant legislative changes considered necessary to ensure the status and highest possible participation in the new voluntary classification system.

8.1 Planning for the transition to the new joint ACS

298. The transition to the new ACS will need to be well coordinated between Kazakhstan and the Kyrgyz Republic, and within each country. After evaluating the recommendations included in the present report, the two governments are to prepare an **action plan** for introducing the new joint ACS in their respective countries. The action plan should ideally cover the following activities:

- A.1. Appointing experts to finalize the detailed classification criteria for each accommodation type, which will replace the present ACS criteria in both countries. The experts will conduct **pilot inspections** by using the classification criteria of the present report and finetune the ACS accordingly. These pilot inspections should include all types of accommodation covered by the new ACS.
- A.2. Deciding on the organization to be appointed as National ACS Operator in each country.
- A.3. Making personnel decisions concerning the staffing of each country's National ACS

Operator, as well as the members of the linked committees; that is, the Transborder Steering Committee, the National Classification Committee and the Ethics and Appeals Committee.

- A.4. Preparing legislation regarding the mandate of the National ACS Operator, the exclusive use of classification symbols such as hotel stars by the National ACS Operator, accommodation licensing and similar (see Annex A3 for more details). Here it must be noted that stakeholders pointed out that the process of amending legislation may take between one and two years, thus slowing down the introduction of the new ACS.
- A.5. Asking the team of each National ACS Operator to prepare the Code of Conduct as detailed in Chapter 7.4
- A.6. Asking the team of each National ACS Operator to prepare the bylaws for the three committees, i.e., the Transborder Steering Committee, the National Classification Committee and the Ethics and Appeals Committee.
- A.7. Asking the Transborder Steering Committee to prepare an international competition among creative agencies focused on developing the ACS's branding, i.e., the system's logo and classification symbols, the corporate identity of the two National ACS Operators, the new system's web presence and a brand manual.
- A.8. Assigning the branding of the new ACS to a creative agency.
- A.9. Asking the National ACS Operator to prepare a cost analysis for inspections and calculate the inspections price tag.
- A.10. Appointing one marketing communications officer at each National ACS Operator, who will communicate the joint ACS as a new quality initiative for the Kazakh and Kyrgyz accommodation sector. This person will oversee the system's website, prepare, and distribute press releases, organize press trips to the two countries, develop social media content and coordinate a hospitality awards programme in cooperation with the tourism authorities of each country.
- A.11. Asking the National ACS Operator to contact potential vendors of software and applications, as described in Chapter 7.1 (application administration database, official database of classified accommodation establishments, website of the ACS, online inspection checklist, email automation software, self-assessment form).
- A.12. Assigning the design and development of the software and applications to a vendor, as described in Chapter 7.1 (application administration database, official database of classified accommodation establishments, website of the ACS, online inspection checklist, email automation software, self-assessment form).
- A.13. Asking the National ACS Operator to contact guest review aggregators for providing monitoring tools and sentiment analyses.
- A.14. Contracting one of the guest review aggregators to provide monitoring tools and sentiment analyses, as described in Chapter 7.3.
- A.15. Asking the National ACS Operator to decide on the most suitable option for employing inspectors, i.e., through part-time or full-time employment, through freelance/outside contractors or by outsourcing inspections to accredited certification bodies (see Chapter 7.2).

- A.16. Asking the National ACS Operator to calculate the number of inspectors required.
- A.17. Recruiting and training inspectors for conducting the onsite assessments, as detailed in Chapter 7.2, and setting up a pool of such inspectors.
- A.18. Conducting deliberations with the National ACS Operator and relevant government agencies on ways to support accommodation businesses in upgrading their offerings and joining the new joint ACS, as described in Chapter 7.6.

8.2 Indicative implementation schedule per the action plan

299. In accordance with the 18 actions that are part of the recommended action plan in Chapter 8.1, the following implementation schedule is being proposed (see Table 8.2-1). This schedule covers the initial 12-month period for transitioning from the present to the new joint ACS. This schedule will need to be adjusted should the legislative changes take more time, as pointed out by several stakeholders.

Table 8.2-1: Implementation schedule of the action plan for introducing the new joint ACS in Kazakhstan and the Kyrgyz Republic (in months)

Actions	months	1	2	3	4	5	6	7	8	9	10	11	12
A.1. Appointing experts to finalize the detailed classification criteria for each accommodation type		■	■	■	■	■							
A.2. Deciding on the organization to be appointed as National ACS Operator in each country		■	■										
A.3. Making personnel decisions concerning the staffing of each country's National ACS Operator as well as the members of the attached committees				■	■	■							
A.4. Preparing legislation				■	■	■	■	■	■	■	■	■	■
A.5. Asking the team of each National ACS Operator to prepare the Code of Conduct						■	■	■					
A.6. Asking the team of each National ACS Operator to prepare the bylaws for the three committees						■	■	■					
A.7. Asking the Transborder Steering Committee to prepare an international competition among creative agencies for developing the ACS's branding							■	■					
A.8. Assigning the ACS's branding to the creative agency that won the competition.							■	■					
A.9. Asking the team of each National ACS Operator to prepare a cost analysis of inspections							■	■					
A.10. Appointing one marketing communications officer at each National ACS Operator									■	■	■	■	■
A.11. Asking the team of each National ACS Operator to contact potential vendors for a request for proposal concerning software and applications									■	■			
A.12. Assigning the design and development of software and applications											■	■	■
A.13. Asking the team of each National ACS Operator to contact guest review aggregators									■	■			
A.14. Contracting one of the guest review aggregators											■	■	■
A.15. Asking the management of each National ACS Operator to decide on the most suitable option for employing inspectors									■	■			
A.16. Asking the management of each National ACS Operator to calculate the needed number of inspectors									■	■			
A.17. Recruiting inspectors for conducting the onsite assessments											■	■	■
A.18. Deliberations of each National ACS Operator with government agencies for exploring ways of supporting accommodation businesses									■	■	■	■	■

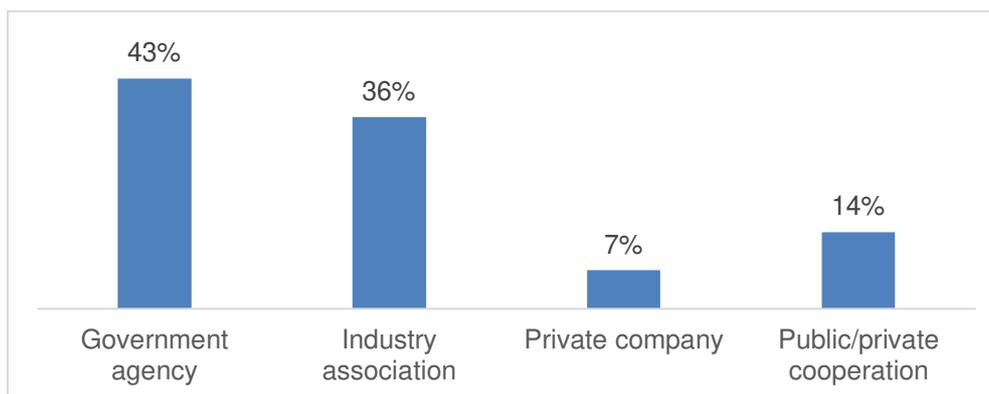
Annex A1. Key Findings from an International Survey among Hotel Classification Specialists

300. An **international survey among hotel classification specialists** was conducted during March and April 2021 by the researchers *Dr. Dimitris Koutoulas* and *Ms. Akrivi Vagena*, both based at the University of Patras in Greece. The survey comprised interviews with a total of 16 people. Twelve are currently operating their respective country's **official national hotel classification system** or did so until recently. Two interviewees participated as experts of hotel classification, one is heading a major private hotel star-rating company based in the US but with a global presence spanning 73 countries (Forbes Travel Guide), and there was also a representative of HOTREC, the European Association of Hotels, Restaurants, Bars and Cafés bringing together 45 national associations in 34 countries.
301. The aim of the survey was twofold. The *first research objective* was to determine which trends and developments have shaped the hotel classification systems over recent years, whereas *the second research objective* was to establish the future of those systems through the eyes of the people who oversee operating them.
302. Interviewees participating in the survey were from Germany, Austria, Greece, Cyprus, Hungary, Latvia, Slovenia, Sweden, Norway, Azerbaijan, Thailand, Italy, South Africa, New Zealand, Belgium, and the USA.
303. Of the 12 official national hotel classification systems represented in the survey, eight are full members or cooperating with Hotelstars Union (HSU). HSU was founded by a group of seven national hotel associations from Europe under the patronage of HOTREC with the aim of providing a harmonised hotel classification with common criteria and procedures in the participating countries. HSU enhances the reputation and quality of the hotel industry in the participating countries by creating transparency and security for the guests and thereby encouraging hotel marketing. Since its inception, HSU has expanded to a total of 20 countries with plans to further grow its European membership.

A1.1 Operational Characteristics of the Surveyed Hotel Classification Systems

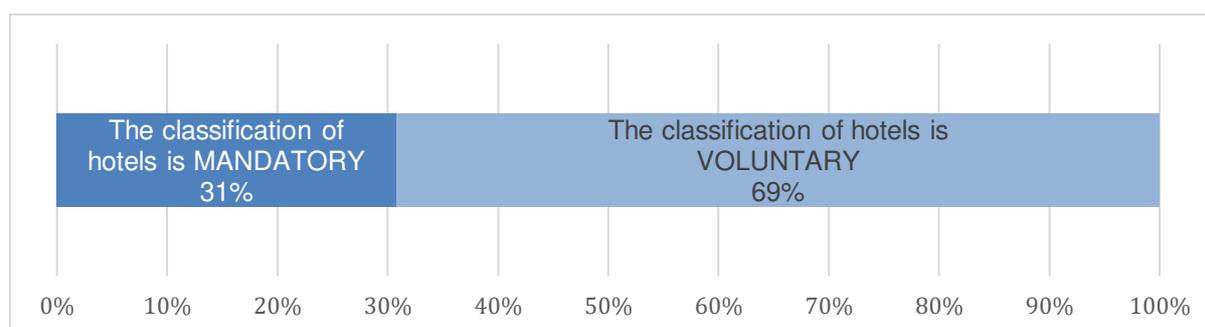
304. The 2021 survey analyzed 14 hotel classification systems from five continents. Except for one private star-rating system (Forbes Travel Guide), the remaining 13 are **official country classification systems**, with nearly half of them being controlled by a government agency (mostly ministries) and another third by hotel industry associations (see Exhibit A1.1-1). In the few remaining cases, the government and the national hotel association worked together in operating the classification.

Exhibit A1.1-1: Organization in charge of operating the hotel classification system (Source: D. Koutoulas and A. Vagena, The 2021 International Survey of Hotel Classification Specialists)



305. Among the 13 official national classification systems analysed in the survey, more than two thirds are voluntary, as shown in Exhibit A1.1-2. Only in 31% of the cases is it mandatory for hotels to get classified.

Exhibit A1.1-2: Type of hotel participation in the country’s official hotel classification system (Source: D. Koutoulas and A. Vagena, The 2021 International Survey of Hotel Classification Specialists)



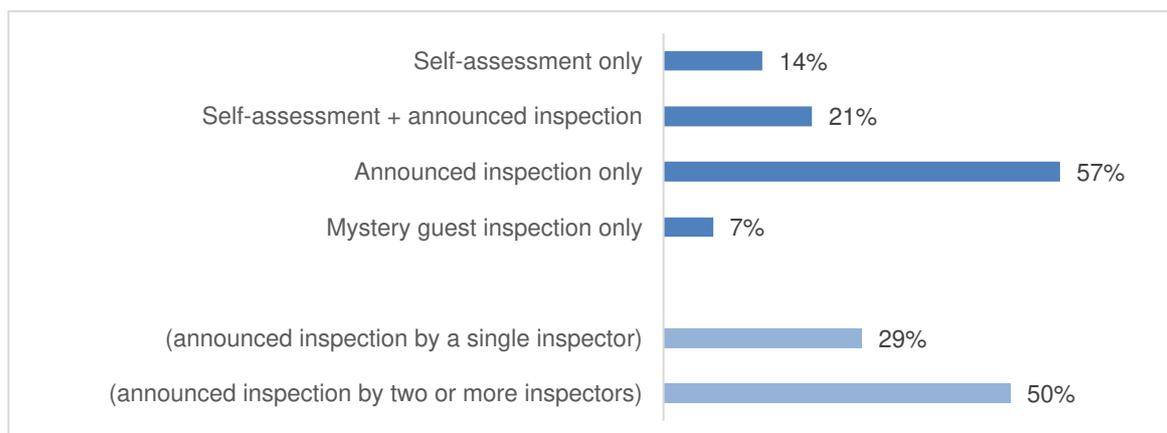
306. Concerning **voluntary** classification only, the **participation rate** of hotels in their country’s official system differs quite widely, ranging from 10% in the case of Azerbaijan and Thailand to over 80% in the case of New Zealand. The sample’s average participation rate in the voluntary national classification system is 41%.

307. Exhibit A1.1-3 shows how the 14 surveyed hotel classification systems (13 official systems + 1 private system) are assessing hotels. 57% rely on announced site inspections for verifying the condition of each hotel before deciding its star rating. 21% of the systems combine announced site inspections with self-assessment, whereas 14% rely exclusively on self-assessment, i.e., the completion of a checklist by the hotel itself without verification by an inspector or another third party. Only one system (Forbes) relies exclusively on mystery guest inspection, that is, unannounced visits by inspectors who stay at each hotel incognito as normal guests without revealing that they are there to assess the hotel. One more system – the one from Austria – also uses mystery guests but only selectively in the case of assessing five-star hotels and those hotels with a “plus” designation.

308. Interestingly, of the 11 countries conducting announced inspections, four (29% of the total sample) are sending out one inspector to each hotel, whereas seven (50% of the total sample) are using two or more inspectors for each assessment, as shown in Exhibit A1.1-3. Inspections may be carried out by trained assessors or professionals, by representatives of government bodies and industry associations or even by fellow

hoteliers, as in the case of Germany.

Exhibit A1.1-3: Ways of assessing hotels for the purpose of classifying them (Source: D. Koutoulas and A. Vagena, The 2021 International Survey of Hotel Classification Specialists)



A1.2 Recent Developments and Key Attributes of Classification Systems

Objectives and focus of classification system internationally

309. According to the review of classification systems internationally, as well as the interviews with classification system operators and experts, the most crucial objective of such systems is assuring **service quality** and verifying the **customer experience**. Measuring and improving those intangible elements is nowadays the **main challenge of a classification system**, as opposed to the task of assessing buildings and equipment which preoccupied the hospitality industry for many decades.
310. It is very much a *hardware vs. software* dilemma, with the “software” dimension gaining ground over recent years. As most accommodation businesses have a good understanding of their hardware-related issues, they are now trying to create the right atmosphere and to evoke positive feelings among their guests. An up-to-date classification system can be a very useful tool by helping businesses improve the guest experience and providing travellers with needed information as to what to expect from their next stay. **This makes it necessary for classification systems to shift attention from hotel facilities to customer experience and service quality**, a transition many accommodation businesses are still struggling with.
311. An in-depth understanding of the actual customer experience offered by an entire industry can be achieved with the help of technology. Therefore several classification system operators already work with or are considering doing so with **guest review aggregators** such as TrustYou, Revinate and ReviewPro. These tools can prove helpful in conducting a sentiment analysis among hotel guests in their country aimed at identifying frequent complaints and changing guest attitudes. Thus, the incorporation of **online reputation management** into the classification system provides very useful and concrete indications concerning the standards of the services provided by different hotel establishments.
312. Another key objective gaining in importance is the incorporation of **sustainability guidelines** into the classification criteria. For instance, Qualmark, New Zealand tourism’s official quality assurance organisation, has associated star ratings with a parallel sustainability certification.

313. Based on the replies of the interviewed classification experts, the objectives of a classification system can be summarised as follows:

- Transparency, so that both guests and hoteliers know what stars stand for.
- Service quality.
- Quality of the guest experience.
- Fulfilling guest expectations.
- Safety and security.
- Cleanliness and hygiene.
- Maintenance.
- Sustainability.

Changes in classification during recent years

314. Concerning a regular and planned approach to changing and evolving accommodation classification systems, the Hotelstars Union (HSU) can be considered the main international reference point. HSU has a policy of reviewing and updating its classification criteria every five years, thus avoiding becoming obsolete. The last revision was completed in 2020 and addressed following key issues:

- More flexibility for accommodating all technological developments, especially those concerning communications (for instance, replacing the standard “telephone in room” with “communication device in room” as tablets are being used by a growing number of hotels as in-room devices; allowing for self-check-in or online check-in as alternatives to checking in at the front desk; acknowledging the capabilities of a smart TV).
- Sustainability issues (offering additional points for eco labels; opting out of linen change; charging stations for electric vehicles; waste reduction by eliminating individual bathroom amenities, magazines, newspapers, and other print information etc.).
- Health, safety, and hygiene issues amplified by the COVID-19 pandemic.

315. The pace of revision outside of Europe is even faster, with Thailand and South Africa updating their classification system every two and three years, respectively. Changes have evolved around technology integration (such as Wi-Fi access) and a bigger emphasis on hygiene. As described in the interview with the South African expert, “*we leave it to hotels to decide on criteria such as size of safe based on their market mix and types of guests, so we are a lot more or a lot less specific and lenient and let hoteliers decide what is fit for purpose.*”

316. The official South African classification also introduced more hotel categories in 2019 such as small hotels, apartment hotels, boutique hotels etc. with very specific definitions that are used *in addition* to the hotel stars. Moreover, South Africa acknowledged the global move toward a higher rating than just five stars by introducing the “five-star premium” rating as an extra motivation for hoteliers. This ultra-luxury status has been assigned to just 20 properties, so far.

317. New Zealand’s *Qualmark* classification has put special emphasis on sustainability criteria as hotels consider environmental issues a major trend. Since the last review in 2018, hotels are receiving points on a 1-5 scale by measuring some environmental indicators (e.g., how much electricity is used against guests or rooms, whether there are timers installed etc.). *Qualmark* is now considering providing excellence scores to hotels going through formal carbon print analysis, a far more complete waste management analysis etc.

318. Greece has further expanded the options for collecting points as part of the official star-rating process by recognizing a growing number of certifications (e.g., ISO 9000; environmental certificates such as ISO 14000, Green Key etc.; Greek Breakfast; Boutique Hotel etc.) and increasing the weight of sports, wellness, recreation, and entertainment as hotel offerings.
319. Another change is the transition from an old rigid classification system with facility-centric checklists to **a more flexible system combining both mandatory and voluntary criteria**, as in the case of Cyprus. There is a list of voluntary criteria, each yielding a specific number of points, and it is up to each business to decide which combination of criteria to fulfil for reaching the needed number of points for the desired classification (e.g., three stars or four stars). This flexibility allows businesses to develop their own personality instead of having the same amenities.⁵⁴

Change in attitude by hoteliers and travellers towards hotel classification over recent years

320. TripAdvisor and other **guest review platforms** had a profound impact on star ratings five to ten years ago. Travellers started to heavily rely on these platforms when choosing accommodation, which furthermore led to confusion as to applicable ratings (e.g., a four-star hotel on an OTA's platform may not be a four-star hotel according to official classification systems). This situation forced classification system operators to adapt their star ratings to new conditions, as hoteliers came to believe that hotel stars were not relevant anymore. Due to recent changes within classification systems, hoteliers seem to be convinced now that hotel stars still have a role to play. Moreover, they have been supporting the rollout of, mostly voluntary, star rating systems throughout Europe and beyond.
321. Hotel stars have provided a reliable beacon for consumers for a very long time, whereas consumer reviews may lead to some confusion when stars are being used. The two approaches serve different needs: Official classification offers an **objective evaluation** of hotels, while guest review platforms provide **subjective opinions** and ratings made by travellers. Both have their value and are **complementing** the total information available to travellers. The COVID-19 pandemic reminded consumers of the importance of classification systems, especially regarding hygiene and safety, and has led hoteliers to seek further investments in this area. Especially among small hotels, classification can be seen as a valuable marketing quality management tool.
322. Over the years, guest rating platforms have become familiar to most travellers. The same cannot be said about some official classification systems, which can be confusing to consumers. Without easy-to-understand criteria and the proper communication, they will hardly regain their reliability. Research has shown that official hotel stars have a greater importance for business travellers, but less so in the case of leisure travellers.
323. A growing number of official classification systems – incl. HSU members as well as Abu Dhabi – are using online guest reviews as an input in their ratings. In Germany, for instance, guest reviews on TripAdvisor, HolidayCheck and other platforms are being consulted by auditors looking for complaints and weak spots before inspecting a hotel. A similar approach is being followed by Azerbaijan as well. There is a surveillance algorithm in place alarming DEHOGA, Germany's hotel classification system operator, of any dramatic change in guest ratings, which is then addressed together with the affected hotel.

⁵⁴ In Cyprus, for instance, the old system forced five-star hotels to offer a ballroom. Now, it is at their discretion whether to replace the ballroom with some other amenity such as a spa.

324. There was a **recent court decision in France against Booking.com** using its own stars instead of the official hotel stars. Now the company is forced to use only official stars on its website. Booking.com already cooperates with Germany regarding data exchange and has been supplied with the official star ratings of all German hotels. This is happening in other countries as well. In New Zealand, OTAs and TripAdvisor have reinstated the official Qualmark ratings, while two years ago they would have used self-rating and guest ratings.

A1.3 Future Developments in Accommodation Classification

Accommodation classification across borders

325. There are examples of successfully expanding star-rating systems to other countries, with HSU having expanded to 20 countries, and Forbes inspecting and certifying hotels in 73 countries. There has also been cooperation between countries of Southern Africa, i.e., South Africa, Seychelles, Zambia, Lesotho, Malawi, Zimbabwe, and Mozambique.
326. The success and rapid growth of HSU has shown that **cross-border cooperation and harmonization of hotel classification systems** have been long overdue. The case of Latvia is quite telling: The country operated its own national classification system until 2006. Between 2006 and 2010 they joined the Baltic system, later the Nordic-Baltic system, and finally the HSU, as they considered the HSU system more objective. Thus, the geographic scope of cooperation in the field of hotel classification in Europe kept expanding and now encompasses 20 countries, with more to follow.
327. The founders of HSU agree about the most crucial success factor of HSU: **It is a bottom-up and not a top-down initiative**, meaning that this project started from the sector itself, with the national hotel associations agreeing to implement it. Would it have come from a higher authority, they doubt whether such an undertaking would have been successful.
328. Further expansion of HSU must deal first with each potential member country's national characteristics. According to the representative of Austria, *"there are differences such as very traditional hotels in several countries which should have their space in the system, but we want to be flexible to also include new hotel concepts."*
329. The representative of Greece also commented on each country's unique features:
- "There are limitations in pre-existing buildings that cannot – or should not – be upgraded in order not to lose their character. A national classification system must deal with this situation and ensure the operation even of the hotels facing such limitations. However, there is a common tradition in Europe allowing us to define those minimum standards that people know about and are expecting to find in their hotel. Based on these minimum common standards we then create our own national system to differentiate ourselves from our competitors."*
330. Most classification experts agree that a global system is potentially feasible and beneficial, as it will resolve some of the travellers' questions and insecurities when picking a hotel. A **modular approach** means that a global system should have two components:
- some common standards, plus
 - some added national criteria to be defined by each country.
331. However, other experts are not in favour of a global system especially in the case of a top-down approach.

Future-proofing a classification system

332. Numerous recommendations have been made by the interviewees which will be presented below. Countries participating in HSU praise the network's policy for **regularly reviewing and updating** its classification criteria in accordance with technological and social developments and changing guest preferences. HSU has a five-year revision cycle, but some interviewees propose a shorter cycle as the market situation is changing quite rapidly, especially regarding **technology**.
333. COVID-19 is the most recent example of how people's behavior and needs have changed, making it necessary to evolve star-rating standards around **cleanliness and hygiene**, and to reflect how accommodation providers are operating today to protect their guests' health without compromising the latter's comfort.
334. **Transparency** is also a keyword that came up several times during the interviews. This means that travellers should have a very good understanding what official categories stand for and what to expect when booking a specific star category. The same also applies to hoteliers, who should be fully aware of the standards they are expected to adhere to.
335. A challenge frequently mentioned during the interviews is **consistency**, i.e., applying the classification standards in the same way to all businesses throughout the country. A particular classification should offer guests the assurance that all minimum standards are met by the accredited businesses. The **objectivity** of accommodation classification is crucial as well, not only for guests but also for accommodation businesses expecting the classification system to operate with integrity and fairness. In this way, the official classification will be a contributing factor to **value for money**, as star ratings will be assuring guests that they receive a hospitality experience worth its money.
336. Finding a way of incorporating **guest reviews** into the official star classification was mentioned as a priority by several interviewees, who also pointed out that several countries are already doing so, such as Norway and Abu Dhabi. This is a way of evaluating not just the objective criteria but also highly subjective issues ranging from cleanliness and staff attitude to the quality of food and other intangible aspects of a hospitality business.
337. **Sustainability** should also be clearly defined and included as classification criteria in official systems. For travellers it is important to know how they can limit their impact on the environment, as such information is already affecting the choice of accommodation.
338. As travellers are becoming more socially conscious, the hospitality sector needs to communicate how it is having a positive impact on society. **Working conditions** for staff members and **social responsibility initiatives** such as food waste elimination can be included as criteria in a classification system. **Inclusiveness** is also a topic of growing importance, as hospitality businesses need to showcase how they are offering better **accessibility** (e.g., for guests with reduced mobility) and are catering to **guests with special requirements**, for instance by covering dietary needs like vegetarian, vegan, gluten-free, lactose-free, halal, kosher, low-fat, low-sodium, anti-allergenic etc.
339. At the operational level it is important for an official classification system to be as affordable and unbureaucratic as possible, with **easy online and paperless registration** becoming the norm. Accommodation businesses have also been very appreciative of classification systems offering in addition to their appraisals advice, training, and managerial tools for maintaining and improving service quality.
340. Finally, it is the **flexibility** of an official classification system to quickly acknowledge and

adapt to changing market conditions that will ensure its viability and prove its usefulness to both accommodation businesses and travellers. This includes constantly monitoring the evolving needs and preferences of both business and leisure travellers but also the changing needs of accommodation businesses, regardless of whether they are small family-owned hospitality operators or large hotels belonging to international brands.

341. So, it is all about remaining useful, being flexible to accommodating the changing needs of both travellers and hoteliers, providing transparency but also third-party verification – an independent assessment – to all the Internet-sourced information that can become overwhelming and confusing at times.
342. The representative of Germany shared the following story to explain his optimism regarding the future of hotel star ratings:

*“In 2010 in France the hotel classification was changed from a mandatory system to a voluntary system conducted by Atout France. But not all French hotels had a classification. So, when the new system launched, only 50% were classified. For the other hotels, all stars on the web, on Booking, Expedia etc. had to vanish. And from the very next moment, those hotels weren’t sold. Only hotels with a star symbol were sold. So deep in the heart of customers, for whatever reasons, as we have done for many years, **stars are the currency of hotels**. If they are not there, it feels uncomfortable. We had some legal complaints against Booking.com in Germany because they used their own stars from an algorithm from sources they couldn’t even explain where their stars came from. And we took them to court, and they were sentenced that if they use stars, it must be ours. So, they now have an interface to our database. I think with all the fraud on the web, hotel classification, if conducted the right way, will have a greater importance.”*

Annex A2. The Accommodation Sector of Kazakhstan and the Kyrgyz Republic

343. The present Annex includes an overview of key data on the accommodation sector of both countries. The review of this data provides a better understanding of the size and characteristics of this industry and allows to focus on those types of accommodation that are predominant and of special relevance to the classification task of both countries.

A2.1 The Accommodation Sector of Kazakhstan

344. According to the data in Table A2.1-1, a total of 3,514 accommodation businesses were operating in Kazakhstan in 2020. Hotels – both with and without a restaurant – represent 60% of all available accommodations. A further 28% corresponds to holiday homes in various forms such as one-storey bungalows, country houses/chalets, cottages, small houses, and apartments. Other types of accommodation cover just a small share of total accommodation businesses.

Table A2.1-1: Number of accommodation establishments by type and form of ownership in Kazakhstan in 2020 (Source: Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan)

	TOTAL		including				
			State property	Private property	of which		Foreign property
					property of joint ventures with foreign participation		
Total in Kazakhstan	3 514	(100%)	cam93	3 378	28	43	
Hotel with restaurant	761	(22%)	6	736	14	19	
Hotel without restaurant	1 325	(38%)	7	1 305	10	13	
Motel	15	(0,4%)	-	15	-	-	
Recreation boarding house	28	(1%)	x	27	-	-	
Kid's camp	119	(3%)	61	55	x	3	
One-storey bungalows, country houses (chalets), cottages, small houses, and apartments	1 000	(28%)	11	984	2	5	
Trailer parks, entertainment towns, hunting and fishing grounds for short-term accommodation	6	(0,2%)	2	4	-	-	
Camping	29	(1%)	-	29	-	-	
Tourist base	52	(1%)	4	48	-	-	
Rest House	81	(2%)	1	77	1	3	
Tourist camp	2	(0,1%)	-	2	-	-	
Other types of accommodation	96	(3%)	-	96	-	-	
of which Hostels	56	(2%)	-	56	-	-	

345. More than half of the country's room capacity is concentrated in just four of Kazakhstan's 17 regions. As shown in Table A2.1-2, the highest concentration of rooms in tourist accommodation can be found in Almaty City (with 15% of the country's total room capacity), East Kazakhstan (14%), Almaty Region (13%) and Nur-Sultan City (11%). With a total of 77,131 rooms available countrywide, the **average accommodation size is 22 rooms** per establishment. The average size varies a lot between regions, with accommodation businesses in Mangystau and Nur-Sultan City reaching 40 rooms per establishment.

Table A2.1-2: Regional breakdown and room capacity of accommodation establishments in Kazakhstan in 2020 (Source: Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan)

Region	Number of establishments	(Regional share of establishments)	Number of rooms	(Regional share of rooms)	Average number of rooms per establishment
Total KAZAKHSTAN	3 514	(100%)	77 131	(100%)	22
Akmola	311	(9%)	4 955	(6%)	16
Aktobe	97	(3%)	2 010	(3%)	21
Almaty region	539	(15%)	10 284	(13%)	19
Atyrau	101	(3%)	3 216	(4%)	32
West Kazakhstan	73	(2%)	1 751	(2%)	24
Zhambyl	185	(5%)	2 295	(3%)	12
Karagandy	247	(7%)	4 645	(6%)	19
Kostabay	138	(4%)	2 287	(3%)	17
Kyzylorda	112	(3%)	1 477	(2%)	13
Mangystau	91	(3%)	3 672	(5%)	40
Pavlodar	114	(3%)	3 090	(4%)	27
South Kazakhstan	114	(3%)	1 824	(2%)	16
Turkestan	175	(5%)	2 067	(3%)	12
East Kazakhstan	562	(16%)	10 919	(14%)	19
Nur-Sultan city	212	(6%)	8 338	(11%)	39
Almaty city	335	(10%)	11 924	(15%)	36
Shymkent city	108	(3%)	2 377	(3%)	22

346. Most of the accommodation amounts to standard rooms, representing 68% of the country's total room capacity (see Exhibit A2.1-1). Far smaller is the share of rooms without amenities (16% of the total room capacity) and suites offering more luxury to guests (14%).
347. Nationwide there is an average number of 2.4 beds per room among the accommodation establishments of Kazakhstan. Accommodation performance in 2020 was strongly affected by the COVID-19 pandemic, with occupied bed-days – or overnight stays – dropping to just 5,679.651 - a 46% decrease compared to 2019 (see Table A2.1-3).
348. According to Table A2.1-4, hotels with restaurants secure annual revenues of 47 billion KZT, amounting to 70% of the accommodation industry's total income of nearly 67 billion KZT. Hotels without restaurants make an additional 18% of the industry's revenues, thus the hotel sector secures 88% of the industry's revenues. Ranking in third place are holiday homes such as one-storey bungalows, country houses/chalets, cottages, small houses, and apartments with a share of 7%. Hotels with restaurants also have a much higher income per occupied bed-day amounting to 19,577 tenge, nearly double the amount for all accommodation in Kazakhstan (11,722 tenge).

Exhibit A2.1-1: Share of room types among accommodation establishments in Kazakhstan in 2020 (Source: Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan)

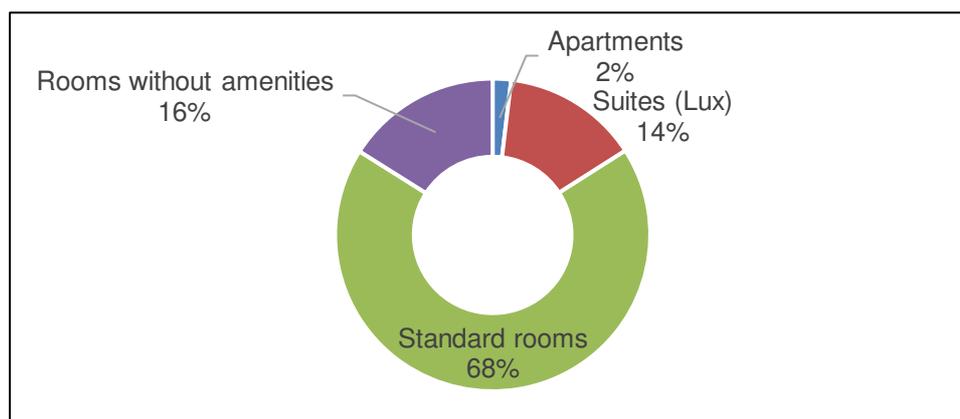


Table A2.1-3: Bed capacity and occupancy rate in Kazakhstan between 2016 and 2020 (Source: Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan)

Year	One-time capacity (beds)	Bed occupancy (%)	Occupied bed-days
2016	138 062	22,7	7 582 785
2017	152 601	25,0	9 544 646
2018	168 603	23,2	9 602 762
2019	181 201	20,7	10 520 133
2020	183 619	17,3	5 679 651

Table A2.1-4: Accommodation indicators by type in Kazakhstan in 2020 (Source: Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan)

	Number of establishments	Number of visitors	Number of rooms	One-time capacity, beds	Number of rooms sold	Occupied bed-days	Volume of services provided, thousand tenge (KZT)	Tenge (KZT) per occupied bed-day
Total in Kazakhstan	3 514	3 581 340	77 131	183 619	3 307 695	5 679 651	66 860 328,5	11 772
Hotel with restaurant	761	1 633 808	28 936	50 015	1 728 734	2 413 297	47 244 507,9	19 577
Hotel without restaurant	1 325	1 178 344	22 123	41 569	1 042 116	1 791 409	11 707 619,9	6 535
Motel	15	10 639	152	288	7 236	16 003	59 908,8	3 744
Recreation boarding house	28	30 446	1 052	2 800	15 703	58 391	344 672,9	5 903
Kid's camp	119	9 235	4 565	27 256	6 709	34 163	231 322,3	6 771
One-storey bungalows, country houses (chalets), cottages, small houses, and apartments	1 000	517 533	14 345	43 836	337 575	904 460	4 909 726,7	5 428
Trailer parks, entertainment towns, hunting and fishing grounds for short-term accommodation	6	125	32	110	86	164	2 344,7	14 297
Camping	29	15 994	238	569	7 973	19 351	54 550,7	2 819
Tourist base	52	67 298	1 104	3 814	15 091	42 753	217 221,6	5 081

Rest House	81	63 784	2 948	7 787	60 189	131 439	1 186 283,6	9 025
Tourist camp	2	-	55	324	-	-	-	-
Other types of accommodation	96	54 134	1 581	5 251	86 283	268 221	902 169,4	3 364
of which Hostel	56	19 289	587	2 319	25 193	56 917	223 832,8	3 933

349. In 2020, total turnover of accommodation businesses was nearly halved, dropping to 66.9 billion tenge as compared 120.5 billion tenge the year before the pandemic's outbreak (see Table A2.1-5). All accommodation types witnessed a healthy increase in revenue until 2019, with non-hotel accommodation and campsites having a much higher growth rate than hotels.

350. In 2020, a year of uncertainty due to the COVID-19 pandemic, residents of Kazakhstan were the country's main source of hotel guests with a ratio between residents and non-residents of approximately 10 to 1, as shown in Table A2.1-6. Except for three-, four- and five-star hotels, foreigners were quite negligible as a market segment in that particular year. The big difference in bed occupancy as compared to room occupancy reveals that five-star hotels tend to have a higher proportion of single business travellers than the rest of the hotels. Five-star hotels also have a much higher income per bed-day amounting to 35,534 tenge, nearly double the income of four-star hotels or four times the income of hotels without a star rating.

Table A2.1-5: Volume of services provided – revenue in thousand tenge (KZT) (Source: Bureau of National Statistics, Agency for Strategic Planning and Reforms of the Republic of Kazakhstan)

Year	TOTAL ('000 KZT)	Hotel services ('000 KZT)	Accommodation for weekends & other short-term stays ('000 KZT)	Campsites, recreational car parks & trailer parks ('000 KZT)	Other types of accommodation ('000 KZT)
2016	82 853 434,6	74 342 033,5	8 151 421,1	26 074,9	333 905,1
2017	108 359 760,4	96 615 886,7	11 231 776,6	37 928,7	474 168,4
2018	103 948 256,9	89 706 419,2	13 569 071,2	62 116,5	610 650,0
2019	120 527 162,1	103 530 045,6	15 914 993,1	103 602,4	978 521,0
2020	66 860 328,5	59 012 036,6	6 889 227,1	56 895,4	902 169,4

Table 2.1-6: Main indicators of hotels in Kazakhstan in 2020 (Source: Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan)

Hotels	Number of establishments	Number of visitors		Number of rooms	One-time capacity, beds	Occupancy rate (%)		Occupied bed-days	Average cost of bed-day, KZT
		Non-residents	Residents			Beds	Rooms		
5-star hotels	26	104 845	238 343	4 163	6 645	19,5	28,8	407 308	35 534
4-star hotels	64	52 592	246 679	5 127	8 276	18,1	20,8	461 097	18 642
3-star hotels	49	21 925	148 925	2 889	4 717	17,5	19,7	271 937	11 014
2-star hotels	7	357	13 107	295	493	11,5	14,7	20 275	13 147
1-star hotels	4	87	3 337	145	278	11,8	14,0	6 131	5 136
No category	1 936	65 910	1 916 045	38 440	71 175	17,0	18,8	3 037 958	8 199

351. In 2020, the number of international visitors (non-residents) dropped dramatically to 252,000, down from 979,000 the year before (see Table A2.1-7). The number in Kazakh guests (residents) also decreased, but to a lesser degree. During the five-year period between 2016 and 2020 on average, 74% of *non-residents* stayed in *classified* hotels, whereas 74% of *residents* stayed in *non-classified* hotels.

Table A2.1-7: Number of visitors in accommodation establishments (tourists) by category between 2016 and 2020 (Source: Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan)

		2016	2017	2018	2019	2020
All visitors	TOTAL ACCOMMODATION	4 217 782	5 279 406	5 526 864	6 266 563	3 581 340
	5* hotels	613 808	702 172	617 237	641 479	343 188
	4* hotels	491 944	589 148	521 530	576 861	299 271
	3* hotels	562 304	601 667	529 394	608 131	170 850
	2* hotels	76 538	67 473	61 564	32 795	13 464
	1* hotels	38 005	63 618	45 999	33 408	3 424
	Hotels without category	1 638 957	2 084 017	2 436 543	2 922 426	1 981 955
	Other accommodation	796 226	1 171 311	1 314 597	1 451 463	769 188
Non-residents	TOTAL ACCOMMODATION	722 515	891 911	830 922	979 781	252 726
	5* hotels	293 101	365 131	314 793	330 261	104 845
	4* hotels	149 831	174 584	144 910	160 621	52 592
	3* hotels	131 078	158 233	127 535	185 360	21 925
	2* hotels	3 864	2 911	3 180	2 183	357
	1* hotels	2 048	2 000	1 904	1 426	87
	Hotels without category	131 909	171 432	209 635	258 493	65 910
	Other accommodation	10 684	17 620	28 965	41 437	7 010
Residents	TOTAL ACCOMMODATION	3 495 267	4 387 495	4 695 942	5 286 782	3 328 614
	5* hotels	320 707	337 041	302 444	311 218	238 343
	4* hotels	342 113	414 564	376 620	416 240	246 679
	3* hotels	431 226	443 434	401 859	422 771	148 925
	2* hotels	72 674	64 562	58 384	30 612	13 107
	1* hotels	35 957	61 618	44 095	31 982	3 337
	Hotels without category	1 507 048	1 912 585	2 226 908	2 663 933	1 916 045
	Other accommodation	785 542	1 153 691	1 285 632	1 410 026	762 178

A2.2 The Accommodation Sector of the Kyrgyz Republic

352. Table A2.2-1 presents the **statistical approach** to accommodation establishments and other tourist enterprises in the Kyrgyz Republic. According to the country's National Statistical Committee, "**accommodation for tourists**" comprise any object that is regularly (or sometimes) presented to tourists for accommodation and overnight stays. Those accommodation facilities for tourists are divided into two main groups:

- Collective accommodation facilities, including:
 - Hotels and similar accommodation facilities (category 1.1.), which have the following features: a minimum number of rooms which are managed as a whole; certain services, including room service, daily bedding, and cleaning of the bathroom; grouped

into classes and categories according to the services provided and the equipment available.

- **Hotels** (group 1.1.1.). This group includes hotels, apartment hotels, motels, roadside and beach hotels, residential clubs and similar establishments that provide hotel services.
- **Similar establishments** (group 1.1.2.). This group includes guesthouses and furnished rooms, tourist hostels and similar accommodation facilities, which consist of a room and provide limited hotel services.
- **Other collective establishments** (category 1.3) comprising recreational dwellings and campsites.
- **Individual accommodation facilities** (category 2.1.) including dwellings, rented rooms in family houses, residences rented from individuals or agencies, accommodation provided free of charge by relatives or friends and other accommodation on an individual basis.

Table A2.2-1: Classification of accommodation facilities for tourists (Source: Statistical Collection "Tourism in Kyrgyzstan 2015-2019". Bishkek, 2020. National Statistical Committee of the Kyrgyz Republic. <http://www.stat.kg/ru/publications/sbornik-turizm-v-kyrgyzstane/>)

Categories	Digits	Groups
1. Collective accommodation facilities for tourists	1.1. Hotels and similar accommodation facilities	1.1.1. Hotels
		1.1.2. Similar accommodation facilities
	1.2. Specialized establishments	1.2.1. Wellness facilities
		1.2.2. Labor and rest camps
		1.2.3. Public transport
		1.2.4. Congress Centers
1.3. Other collective establishments	1.3.1. Recreational dwellings	
	1.3.2. Campsites	
	1.3.3. Other collective establishments	
2. Individual accommodation facilities for tourists	2.1. Individual accommodation facilities	2.1.1. Own dwellings
		2.1.2. Rented rooms in family houses
		2.1.3. Residences rented from individuals or agencies
		2.1.4. Accommodation provided free of charge by relatives or friends
		2.1.5. Other accommodation on an individual basis

353. A total of 1,287 hotels are operating in the country (see Table A2.2-2). 35% of those hotels are in and around Bishkek City. Another high concentration of hotels with a share of 22% can be found in the Issyk-Kul region.

Table A2.2-2: Registered economic entities (legal entities and individuals) operating as hotels in the Kyrgyz Republic, by territory (Source: Statistical Collection "Tourism in Kyrgyzstan 2015-2019". Bishkek, 2020. National Statistical Committee of the Kyrgyz Republic. <http://www.stat.kg/ru/publications/sbornik-turizm-v-kyrgyzstane/>)

Region	Number of establishments	(Regional share of establishments)
Total Hotels in the Kyrgyz Republic	1 287	(100%)
Batken region	49	(4%)
Jalal-Abad region	121	(9%)
Issyk-Kul region	283	(22%)
Naryn region	88	(7%)
Osh region	47	(4%)
Talas region	39	(3%)
Chui region	104	(8%)
Bishkek city	453	(35%)
Osh city	103	(8%)

354. A sample of 207 hotels – or 16% of the country’s total – provided additional information. As shown in Table A2.2-3, 86% of those hotels are operating year-round with only 14% being seasonal business. The situation is quite different regarding other types of accommodation such as sanatoria, recreation boarding houses and children’s health centres, which predominantly operate on a seasonal basis. Hotels are also mostly privately owned (with only six of the sample’s 207 hotels belonging to the state), whereas the government retains a strong presence in the sectors of sanatoria and children’s health centres.
355. The 207 sampled hotels have an average size of 20.9 rooms (see Table A2.2-4). The size of the hotels varies quite strongly between regions, with the smallest establishments being found in the Osh region (with just 6.6 rooms per hotel), whereas the hotels in Bishkek feature the largest average size with 32.9 rooms per establishment.
356. The 207 sampled hotels hosted a total of 230,700 guests in 2019, who spent a total of 409,000 bed-days (see Table A2.2-5). 47% of all guests stayed in Bishkek, with this number rising to 76% in the case of international guests (non-residents).

Table A2.2-3: Enterprises, tourism organizations and recreation establishments by the period of operation in 2019 (Source: Statistical Collection "Tourism in Kyrgyzstan 2015-2019". Bishkek, 2020. National Statistical Committee of the Kyrgyz Republic. <http://www.stat.kg/ru/publications/sbornik-turizm-v-kyrgyzstane/>)

	Units	All year around	Seasonally	State-owned	Privately owned
Total	525	260	265	59	466
Hotels and similar accommodation facilities	207	179	28	6	201
Sanatoria and other specialized accommodation facilities	192	26	166	40	152
Tourist bases	8	1	7	1	7
Sanatoria	13	9	4	4	9
Children's sanatoria	6	5	1	4	2
Sanatoria	12	4	8	2	10
Holiday houses	8	1	7	2	6
Recreation boarding houses	99	1	98	9	90
Pension with treatment	3	1	2	2	1
Recreation centers	10	3	7	-	10
Sports and health camps	9	-	9	5	4
Children's health centers	24	1	23	11	13
Travel agencies and tour operators, travel agencies and excursions	71	48	23	1	70
Natural parks and reserves	10	2	8	9	1
Other tourism enterprises	45	5	40	3	42

Table A2.2-4: Room capacity of sampled Kyrgyz hotels (Source: Statistical Collection "Tourism in Kyrgyzstan 2015-2019". Bishkek, 2020. National Statistical Committee of the Kyrgyz Republic. <http://www.stat.kg/ru/publications/sbornik-turizm-v-kyrgyzstane/>)

	Number of hotels and similar accommodation facilities	Total number of rooms or units	Average number of rooms or units
Kyrgyz Republic	207	4 322	20,9
Batken region	18	287	15,9
Jalal-Abad region	38	414	10,9
Issyk-Kul region	31	933	30,1
Naryn region	24	192	8,0

Osh region	5	33	6,6
Talas region	6	67	11,2
Chui region	16	263	16,4
Bishkek city	49	1 611	32,9
Osh city	20	522	26,1

Table A2.2-5: Number of guests and bed-days (overnight stays) at the sampled Kyrgyz hotels (Source: Statistical Collection "Tourism in Kyrgyzstan 2015-2019". Bishkek, 2020. National Statistical Committee of the Kyrgyz Republic. <http://www.stat.kg/ru/publications/sbornik-turizm-v-kyrgyzstane/>)

	Number of hotel guests (in thousands)	including:		Bed-days provided (in thousands)	including:	
		residents	non-residents		residents	non-residents
Kyrgyz Republic	230,7	147,5	83,2	409	235	174
Batken region	11,3	10,6	0,7	11,9	11,2	0,7
Jalal-Abad region	32,7	30,5	2,2	45,6	41,8	3,8
Issyk-Kul region	19,8	16,3	3,5	55,4	44,3	11,1
Naryn region	7,4	3,9	3,5	8,3	4,5	3,8
Osh region	0,5	0,4	0,1	0,5	0,4	0,1
Talas region	2,7	2,6	0,1	5,6	5,4	0,2
Chui region	16,1	13,1	3,0	12,6	11,2	1,4
Bishkek city	108,0	44,3	63,7	195,1	53,8	141,3
Osh city	32,2	25,8	6,4	74,0	62,4	11,6

357. Based on the data of Table A2.2-5, the average length of stay can be calculated (see Table A2.2-6). Hotel guests spent on average 1,8 days at Kyrgyz establishments, with international guests (non-residents) having a significantly longer average stay than Kyrgyz residents (2.1 versus 1.6 days). The longest average stay has been registered at hotels in Issyk-Kul with 2,8 nights.

Table A2.2-6: Average length of stay of all guests at the sampled Kyrgyz hotels (Source: Statistical Collection "Tourism in Kyrgyzstan 2015-2019". Bishkek, 2020. National Statistical Committee of the Kyrgyz Republic. <http://www.stat.kg/ru/publications/sbornik-turizm-v-kyrgyzstane/>)

	Average length of stay of all hotel guests (in days)	of which:	
		residents	non-residents
Kyrgyz Republic	1,8	1,6	2,1
Batken region	1,1	1,1	1,0
Jalal-Abad region	1,4	1,4	1,7
Issyk-Kul region	2,8	2,7	3,2
Naryn region	1,1	1,2	1,1
Osh region	1,0	1,0	1,0
Talas region	2,1	2,1	2,0
Bishkek city	1,8	1,2	2,2
Osh city	2,3	2,4	1,8

358. As shown in Table A2.2-7, international hotel guests pay on average 2,300 KGS per bed per day as compared to 1,845 KGS by residents. Thus, non-residents pay approximately 25% more than local guests. The average room rate varies dramatically between regions, with hotels in Bishkek and Chui charging the highest prices and hotels in the Batken and Osh regions having the lowest cost per bed-day.

Table A2.2-7: Average cost of a bed-day at the sampled Kyrgyz hotels (Source: Statistical Collection "Tourism in Kyrgyzstan 2015-2019". Bishkek, 2020. National Statistical Committee of the Kyrgyz Republic. <http://www.stat.kg/ru/publications/sbornik-turizm-v-kyrgyzstane/>)

	Average cost of a bed-day (in KGS):	
	for residents	for non-residents
Kyrgyz Republic	1 845	2 300
Batken region	400	650
Jalal-Abad region	600	750
Issyk-Kul region	900	1 200
Naryn region	650	700
Osh region	500	600
Talas region	700	1 000
Chui region	2 100	3 000
Bishkek city	2 700	3 000
Osh city	1 530	1 725

Annex A3. Recommendations Concerning Potential Legislative Changes

359. As discussed in Chapter 4.4, the joint ACS comes with some obvious legal implications. Those implications result from the proposed **voluntary character** of the new classification system.
360. The legal protection of star ratings is an **extremely crucial prerequisite** for successfully establishing the new classification system on the domestic and international market. If any hotel can assign itself a star rating and use it without any type of limitation, the new ACS will not gain credibility and acceptance among accommodation operators, the travel trade, and the travelling public. Experience from several European countries has shown that enforcing the exclusive use of the official star ratings on OTA and review platforms such as TripAdvisor and Booking.com has provided a **strong incentive for hoteliers** to join the voluntary classification system of their respective countries. Developments in Europe over the last 15 years have shown that **no three-star, four-star or five-star hotel can afford an online presence (on its own website, on OTA platforms and on review platforms) without its star rating**. It will have difficulty in getting bookings and in implementing its pricing policy because consumers will lack an understanding of its overall standing (see Exhibit A3-1). Economy hotels in the one-star and two-star sector may feel less pressured in this regard.
361. Therefore, the following legislative actions are being strongly recommended, also considering that hotel stars are widely abused by their unauthorized use, a situation that strongly undermines the successful launch of the new joint ACS:
- The two selected National ACS Operators can be issued with the mandate of handling official accommodation classification and, thus, have the **exclusive usage right to star and other rating symbols**.

Exhibit A3-1: Example of hotel listings on OTAs complete with official star ratings

The screenshot displays the Booking.com interface for a search in Berlin. The search results show two hotel listings, each with its official star rating circled in red:

- NH Berlin Kurfürstendamm**: 4 stars (4 yellow stars and 1 gold star icon). Rating: Very good 8.4 (2,767 reviews).
- Holiday Inn Express - Berlin Alexanderplatz, an IHG Hotel**: 4 stars (4 yellow stars and 1 gold star icon). Rating: Fabulous 8.6 (4,431 reviews).

The search filters on the left include: Destination/property name: Berlin; Check-in date; Check-out date; 2 adults; 2 children; 1 room; 12 years old; 12 years old; I'm travelling for work.



NH Berlin Kurfürstendamm ★★★★★ 

Charlottenburg-W
3.8 km from centre
This 4-star hotel is on a quiet street, a 4-minute walk from the centre.

This star rating is provided to Booking.com by the property, and is usually determined by an official hotel rating organisation or another third party.

[You can find out more in our Terms and Conditions.](#)

Very
2.767 r

Sho

- No accommodation establishment or any other entity has the right to use star ratings or other rating symbols without having been duly authorised and certified by the respective National ACS Operator. Moreover, its evaluation must be valid.
 - A valid classification certificate, issued by the respective National ACS Operator, is mandatory if star or any other rating symbols are showcased on electronic or print media and other outlets. Outlets include: an accommodation business's own website or print brochure, signage in and around the accommodation, accommodation listings in printed guides and on the Internet, websites of OTAs and guest review platforms, tour operator websites and brochures, social media, search, and metasearch platforms. Guest ratings on guest review platforms, OTA websites, social media outlets, as well as on search and metasearch platforms, will be marked as non-official. If required, a specification will be made informing the visitor of the availability of an official classification system.
 - Both the voluntary character of the classification and the quality of accommodation establishments in both countries will be strengthened by **separating the licensing of an accommodation business (such as a hotel or a campsite) from the classification process**. In the first case (licensing), the business will have to adhere to minimum standards that apply to any hospitality business regardless of class (such as fire safety and sanitary requirements, bedding etc.). After receiving a license from a government agency, a business shall have the freedom to decide whether to apply to the National ACS Operator for official classification or operate as an unclassified business (i.e., a hotel without stars). This separation of licensing from classification already applies in both countries. However, licensing appears to be very lax and fails to include basic technical or functional standards control mechanisms. Therefore, the introduction of legislation describing a more substantial yet unbureaucratic licensing process is recommended.
362. Another potential legislative initiative may cover the committees as described in Chapter 7.4. This potential legislation can be based on the output of Activity A.6 (see Chapter 8.1), which includes the preparation of the **committees' bylaws**, and should clearly define the member positions of each committee:
- **Transborder Steering Committee:**
 - Committee's mandate: Deciding on the future modification of classification standards; approving acceptable variations of standards between the two countries; and handling intellectual property rights.
 - Committee members:
 - Representatives of Kazakhstan: at least one representative from the Kazakh National ACS Operator and one representative from a Kazakh

industry association (hotel or other accommodation type).

- Representatives of the Kyrgyz Republic: at least one representative from the Kyrgyz National ACS Operator and one representative from a Kyrgyz industry association (hotel or other accommodation type).

- **National Classification Committee (one for each country):**

- Committee's mandate (similar for each country): Providing advice and monitoring the work of each country's National ACS Operator; and resolving any issue that may arise concerning the introduction and implementation of the new system.
- Committee members: Up to seven members representing both government agencies and industry associations.

- **Ethics and Appeals Committee (one for each country):**

- Committee's mandate (similar for each country): Handling complaints against (1) classified businesses, (2) inspectors and administrative staff of the National ACS Operator, as well as (3) members of the two committees. Also, handling appeals against an establishment's classification, submitted either by the establishment itself or by any other third party (another accommodation business, government agency, customers, etc.).
- Committee members: Ideally comprising three members, one representative from the National ACS Operator, one from a tourism-related government agency and one from an industry association.

363. As described in Chapter 7.4, the new classification system's **Code of Conduct** may also be considered for legislation. This document shall include concrete guidelines for all parties involved in accommodation classification:

- Accommodation providers.
- Inspectors and administrative staff of the National ACS Operator.
- Committee members.

364. Finally, the **completed and detailed classification criteria** for all accommodation types – as described in Chapter 6 – shall become official legislation in both countries.

365. Based on the points, the following **legislative document** can be introduced to both Kazakhstan and the Kyrgyz Republic:

Article 1: The [Organization] is being appointed as the sole administrator and issuer of accommodation classification in [Country], having the exclusive authority to issue official hotel star ratings and ratings of [list other accommodation types]⁵⁵. The [Organization] conducts the classification of every accommodation establishment, which is in the possession of a legal operating license and is already operating, according to the [Organization]'s published classification criteria, rules and business terms following the submission of an application by the interested accommodation establishment.

Article 2: Hotel stars and [other potential symbols for non-hotel accommodation]⁵⁶ are the exclusive property of the [Organization]. No other legal entity can use these symbols in [Country] without authorization by the [Organization].

Article 3: Accommodation establishments operating in [Country] are under no obligation to apply to the [Organization] for their classification. Accommodation establishments which did

⁵⁵ See Chapter 5.1.

⁵⁶ See Chapter 6.1.

not apply for and did not undergo classification must be listed either without any reference to a specific classification category or as “Unclassified”.

Article 4: Accommodation establishments, publishers of print or online accommodation directories, travel agencies, tour operators, online travel agencies and any other entities operating in [Country] may refer to and publicise the rating of an accommodation establishment only if it is based on the official classification certificate issued by the [Organization]. No unofficial use of hotel star ratings and ratings of [list other accommodation types] is being allowed in [Country]. No use of symbols, which create the impression of an official accommodation classification but are not the result of an actual official classification by the [Organization], is being allowed in [Country].

Article 5: A valid classification certificate, issued by the [Organization], is mandatory if accommodation establishments, publishers of print or online accommodation directories, travel agencies, tour operators, online travel agencies and any other entities operating in [Country] are going to use stars or any other rating symbols on electronic or print media and other outlets. Outlets include: an accommodation establishment’s own website or print brochure, signage in and around the accommodation, accommodation listings in printed guides and on the Internet, websites of travel agencies and online travel agencies and guest review platforms, tour operator websites and brochures, social media, search, and metasearch platforms. The entities are required to mention that the listed rating is in accordance with the official accommodation classification in [Country]. Guest ratings on guest review platforms, online travel agency websites, social media outlets, as well as on search and metasearch platforms, must be marked as non-official.

Article 6: The [Organization] shall conduct accommodation classification according to the classification criteria in the Appendix⁵⁷ and by adhering to its business terms and code of conduct. Before commencing classification, the [Organization] is obliged to publicise its business terms and code of conduct on a dedicated website.

Article 7: Before commencing classification, the [Organization] is obliged to activate three committees. The *Transborder Steering Committee* with members from both Kazakhstan and the Kyrgyz Republic has the responsibility of deciding on future modification of classification standards, approving acceptable variations of standards between the two countries, and handling intellectual property rights. The *National Classification Committee* of [Country] has the responsibility of providing advice and monitoring the work of [Organization]. The *Ethics and Appeals Committee* has the responsibility of handling complaints against classified businesses, inspectors, committee members and administrative staff of the [Organization], but also handling appeals against an establishment’s classification, submitted either by the establishment itself or by any other third party (another accommodation business, government agency, customers, etc.). The [Organization] is obliged to publicise the members and the committees’ bylaws on a dedicated website.

⁵⁷ The Appendix will include the detailed classification criteria after they have been finalized.

Annex A4. Proposed Classification criteria

The list below contains the recommended classification criteria, i.e., the standards to be applied for rating accommodation businesses and assigning them in the proper category. Those criteria are the basis for assessing each accommodation business applying for an official classification, as the list below represents the actual checklist to be used by inspectors.

The criteria are based both on the existing classification systems of Kazakhstan and the Kyrgyz Republic and international best practices, particularly the Hotelstars Union standards.

One key limitation concerning the suitability of the present classification criteria is that due to COVID-19 restrictions, those criteria were not field-tested by conducting pilot inspections. For this reason, the classification criteria can be finalized only after the introduction of the new ACS commences. This is the very first activity (A.1) of the Action Plan and is described as follows:

- *Appointing experts to finalize the detailed classification criteria for each accommodation type, which will replace the present ACS criteria in both countries. The experts will conduct pilot inspections by using the classification criteria of the present report and finetune the ACS accordingly. These pilot inspections should include all types of accommodation covered by the new ACS.*

In addition to the pilot inspections, the detailed classification criteria list can also be sent to stakeholders for their feedback.

Depending on the category, each criterion bears either a *number* or the *letter “M”* (for “mandatory”). The number represents the points each accommodation business receives when fulfilling this criterion. All businesses applying for classification need to collect a minimum number of points to achieve a specific category.

Joint criteria categories for all accommodation types (hotels, guesthouses, hostels and campsites)

		Star/Shanyrak/Tunduk categories					Calculation fields			
Categc No.	Standard	*	**	***	****	*****	Point s	Input	Output	Remarks
Data input for calculations										
C1	Total number of rooms (all room types)									
C2	Total number of bed spaces									
C3	Total number of staff									
Staffing and working conditions										
	Number of staff	150	150	150	150	150				C3 : C1
	<i>at least 1 staff per 2 rooms</i>						150			achievable
	<i>at least 1 staff per 3 rooms</i>						100			
	<i>at least 1 staff per 4 rooms</i>					M	50			
	Operational manual provided to staff	M	M	M	M	M				
	Staff training	80	80	80	80	80	80			Training certificates as proof
	<i>at least 20% of staff trained in customer service and/or safety for a minimum of 10 hours during the previous 12 months</i>									
	Staff with formal hospitality training	100	100	100	100	100				Maximum number of points
	<i>at least 40% of staff with a hospitality or tourism degree</i>						100			Degree from an educational
	<i>at least 30% of staff with a hospitality or tourism degree</i>						75			
	<i>at least 20% of staff with a hospitality or tourism degree</i>					M	50			
	Staff speaking a foreign language (besides Russian)	80	80	80	80	80				Maximum number of points
	<i>at least 40% of staff speaking a foreign language</i>						80			Recognized language skill
	<i>at least 30% of staff speaking a foreign language</i>						60			
	<i>at least 20% of staff speaking a foreign language</i>					M	40			
	Staff restaurant or dedicated dining space	10	M	M	M	M	3			
	Locker and shower facilities	10	M	M	M	M	5			
	Staff uniforms		M	M	M	M				Not required in case of a special hospitality concept
	Name badges		M	M	M	M				Not required in case of a special hospitality concept

Surrounding area of the building(s) within the grounds of the business

Properly maintained grounds free of litter and abandoned material	M	M	M	M	M	
Decorative landscaping (e.g. well maintained gardens)	30	30	30	30	30	30
Proper lighting for safely entering and exiting the building(s)	M	M	M	M	M	
Proper non-slippery walkway(s) for safely entering and exiting the building(s) under any weather conditions	M	M	M	M	M	
Outdoor parking space	50	50	50	50	50	50
Indoor parking garage	80	80	80	80	80	80
Parking space for busses	30	30	30	30	30	30
Charging station for electric vehicles	80	80	80	80	80	80

Building exterior

Clean and properly maintained façade	M	M	M	M	M	
Signboard (illuminated at night) on the building's exterior or in front of the building or at the entrance of the accommodation grounds	M	M	M	M	M	

Not required in case of a special hotel concept such as a boutique hotel

Entrance

Weather protection for arriving vehicles				M	M	
Ramp providing easy wheelchair access from street level into the building	M	M	M	M	M	
Sufficient space for busses to approach the entrance			M	M	M	
Air curtain				M	M	
Separate service entrance			M	M	M	

Not required in case of heritage buildings or other
 Not required in case of heritage buildings or other
 Not required in case of a special hotel concept such as a boutique hotel or a
 Not required in case of heritage buildings or other
 Not required in case of heritage buildings or other

Character of accommodation

Heritage building or traditional housing	100	100	100	100	100	100
Building(s) with special architectural features besides the above	80	80	80	80	80	80

Special accommodation concept, holistically applied and properly executed, such as boutique hotel or design hotel or art hotel etc.	150	150	150	150	150	150
Well-maintained and clean interiors throughout the accommodation establishment	M	M	M	M	M	M

150

Fire safety, security and emergencies

Fire detectors	M	M	M	M	M
Sprinklers	M	M	M	M	M
Fire extinguishers	M	M	M	M	M
Emergency exits	M	M	M	M	M
Fire escape stairs (in buildings with two or more floors)	M	M	M	M	M
Emergency lighting	M	M	M	M	M
Closed-circuit TV at entrance points			M	M	M

Not required in case of heritage buildings or other

Power and water supply

Power generator supporting basic lighting and main equipment (including lifts) for at least 24 hours			M	M	M
Reliable and sufficient hot water supply for 24 hours a day	M	M	M	M	M
Water treatment plant for providing safe, potable water				M	M
Drinking water offered in the room free of charge	M	M	M	M	M

Not required in locations where the local water supply
Either bottled or from a water

Heating, ventilation, air-conditioning (HVAC)

Heating in public spaces and guest rooms	M	M	M	M	M
Air-conditioning (cooling) in public spaces and guest rooms for achieving temperatures in the range of 18-25°C	M*	M*	M	M	M
Cooling fans	*	*			
Clean air provision in public spaces and guest rooms	M	M	M	M	M
Air cleaning devices capable of removing viruses in public spaces	20	20	20	20	20
Strict prohibition of smoking in public spaces and guest rooms	M	M	M	M	M

20

Not required in mountain and other regions where heat rarely occurs; Not required in *One-star and two-star establishments can use

Dedicated smoker's lounge with high-powered HVAC and fully separated from other public spaces	???	???	???	???	???
Dedicated, clearly marked smoking rooms (with smoking sign on the door)	???	???	???	???	???

Only where allowed by law

Only where allowed by law

Telecommunications, Internet connection and web presence

Telephone system comprising in-room telephone sets and a switchboard allowing calls between guests and the front desk or other departments			M	M	M	
Telephone system comprising in-room telephone sets and a switchboard allowing external calls (both domestic and international calls)	5	5	5	M	M	5
Telephone booth for public use for both domestic and international calls	1	1	1	1	1	1
In-room Internet device-based telecommunications concept for internal and external calls (as an ALTERNATIVE to aforementioned telephone system)	20	20	20	20	20	20
Secure WiFi Internet access throughout the establishment (including public spaces and rooms)	M	M	M	M	M	
Secure cable-based Internet access in rooms	5	5	5	5	5	5
Access to printer	2	2	M	M	M	2
Dedicated website with a detailed description of the accommodation establishment	5	5	M	M	M	5
Online booking option on the establishment's website	5	5	5	5	5	5

For instance, by utilizing mobile devices for calling the front desk and the other

Cables available in the room or at the front desk upon For printing out boarding

Stairs, elevators and corridors

Elevators in buildings with three or more floors (incl. ground floor)		M	M	M	M
Elevators in buildings with four or more floors (incl. ground floor)	M				
Elevator door and cabin wide enough to fit a wheelchair	M	M	M	M	M
Corridors and corridor doors wide enough to fit a wheelchair	M	M	M	M	M
Staircases wide enough for people being able to comfortably and safely carry their luggage	M	M	M	M	M

Not required in case of heritage buildings or other
 Not required in case of heritage buildings or other
 Not required in case of heritage buildings or other
 Not required in case of heritage buildings or other
 Not required in case of heritage buildings or other

Reception, lobby and arrival/departure

Minimum size of the reception and lobby area	M	M	M	M	M
--	---	---	---	---	---

Minimum size:

1*: 9 sqm for the first 20 rooms + 1 sqm per additional room capped at 25 sqm

2*: 20 sqm for the first 20 rooms + 1 sqm per additional room capped at 40 sqm

3*: 30 sqm for the first 20 rooms + 1 sqm per additional room capped at 80 sqm

4*: 30 sqm for the first 20 rooms + 1 sqm per additional room capped at 120 sqm

5*: 30 sqm for the first 20 rooms + 1 sqm per additional room capped at 160 sqm

Example of 2 hotel with 30 rooms: 20 sqm + (1 sqm x 10 rooms) = 30 sqm*

Area exceeding the minimum size of the lobby and the reception (1 point per 2 sqm topped at 20 points)	20	20	20	20	20	20
Proper set-up for accommodating wheelchair-bound, hearing-impaired and visually impaired guests during their arrival, check-in/out and departure	M	M	M	M	M	
Front desk for privately checking in and checking out arriving and departing guests	M	M	M	M	M	
Seating space adjacent to the front desk	M	M	M	M	M	
Reception service available 24 hours a day for phone calls and digital communication	M	M	M	M	M	
Front desk staffed daily for 8 hours	M					
Front desk staffed daily for 16 hours	5	M	M			5
Front desk staffed daily for 24 hours	10	10	10	M	M	10
Online and/or self check-in and check-out option available	10	10	10	10	10	10
Carrying the luggage to/from the room upon request		M	M	M	M	
Luggage storage during operation times of the front office	M	M	M	M	M	
Acceptance of payments by credit cards	M	M	M	M	M	
Contactless payments	M	M	M	M	M	
Currency exchange	3	3	M	M	M	3
Calling taxis on behalf of guests during operation times of the front office	M	M	M	M	M	

Not required in case of heritage buildings or other building limitations

Not required in regions with poor Internet connection or lacking the proper support by

Wake-up calls upon request during operation times of the front office	M	M	M	M	M	
Safe deposit box for storing valuables	M	M	M	M	M	
Power adapters available for use by guests	M	M	M	M	M	
Concierge services	5	5	5	5	M	5
Valet parking	5	5	5	5	M	5
Doorman	5	5	5	5	5	5
Lobby area with comfortable seating		M	M	M	M	
Lobby bar serving beverages and snacks	5	5	5	M	M	5
Computer for private use with printing capabilities	3	3	3	M	M	3
Business center or dedicated co-working space with proper furniture, power sockets, WiFi, wireless printer as well as food and beverage service	15	15	15	15	15	15
Cloakroom	3	3	3	3	3	3
A number of umbrellas available for use by guests either at the reception or in the guestrooms	3	3	3	M	M	3
Sound-proofing of the lobby area ensuring noise level less than 35 dB	M	M	M	M	M	

Public toilets

Number of public toilets	M	M	M	M	M	
--------------------------	---	---	---	---	---	--

up to 50 rooms: 2 toilets

51 to 100 rooms: 4 toilets

101 rooms and more: 6 toilets

Each toilet comprising at least a WC within an enclosed stall, hooks for clothes, urinal (in men's toilets), washbasin with mirror, electrical outlet, proper lighting and ventilation, toilet paper, soap, terry cloth or paper towels, waste basket	M	M	M	M	M	
Wheelchair-accessible toilet in establishments with 30 or less rooms	15	15	M	M	M	15
Additional wheelchair-accessible toilet in establishments with 31 or more rooms	15	M	M	M	M	15

Not required in case of heritage buildings or other
Not required in case of heritage buildings or other

Room types, size and condition

(For definitions of room types see chapter 5.2)

Room size should allow the guest to move freely, comfortably and safely and use all equipment and furniture

Minimum size of single rooms incl. bathroom (in sqm)	10	12	13	16	18
Minimum size of double rooms incl. bathroom (in sqm)	12	14	15	18	20
Minimum size of triple/quadruple rooms incl. bathroom (in sqm)	15	17	18	22	24
Minimum size of junior suites incl. bathroom (in sqm)	30	30	30	30	30
Minimum size of suites incl. bathroom (in sqm)	35	35	35	35	35
Minimum size of studios incl. bathroom (in sqm)	30	30	30	30	30
Minimum size of apartments incl. bathroom (in sqm)	35	35	35	35	35
Actual room size exceeding minimum size by at least 50%	100	100	100	100	100
Minimum number of suites: 1				M	
Minimum number of suites: 2 - or 5% of the total number of rooms (whichever is higher)					M
Additional suites	50	50	50	50	50
Required number of wheelchair-accessible rooms: 1 (in establishments with more than 30 rooms)	M	M	M	M	M
Required number of wheelchair-accessible rooms: 2 (in establishments with more than 60 rooms)	M	M	M	M	M
All rooms are well maintained, clean and all their features and equipment are fully operational	M	M	M	M	M
There is daylight in all rooms	M	M	M	M	M
Odor-free	M	M	M	M	M
Provision of fresh and clean air by opening window and/or balcony or through air-conditioning or ventilation	M	M	M	M	M

100

50

In at least 50% of the rooms
Excluding apartment hotels

Excluding apartment hotels
10 points per additional suite; maximum 50 points
Not required in case of heritage buildings or other building limitations; required standards include door width,
Not required in case of heritage buildings or other building limitations; required standards include door width,

Sleep experience

Minimum dimensions for single beds: 80 cm x 190 cm	M	M			
Minimum dimensions for single beds: 90 cm x 190 cm			M	M	M
Minimum dimensions for double beds: 160 cm x 200 cm	M	M	M	M	M

Beds exceeding minimum dimensions	150	150	150	150	150
-----------------------------------	-----	-----	-----	-----	-----

in between 40% and 80% of rooms

in more than 80% of rooms

King beds (180 cm x 200 cm) in more than 80% of rooms

50

100

150

Maximum number of points

Clean and properly maintained mattress with a height of at least 13 cm	M	M	M		
Clean and properly maintained mattress with an elastic system (e.g. a box spring) and a height of at least 18 cm	50	50	50	M	M
Mattress with special anatomic features or mattress exceeding the minimum height by at least 4 cm	100	100	100	100	100
Mattress less than 5 years old	100	100	100	100	100
Annual thorough cleaning of mattress	80	80	80	80	80
Clean and properly maintained mattress topper	80	80	80	80	80
Clean, properly maintained and washable mattress protection cover	M	M	M	M	M
Everything an arriving guest finds on their bed must be clean and hygienic; any decorative items or bedthrows that are not being washed before the arrival of each guest are strictly prohibited	M	M	M	M	M
One pillow on each single bed, two pillows on each double bed	M	M	M	M	M
Annual cleaning or replacement of pillows	M	M	M	M	M
Hygienic pillow protection encasement	10	10	M	M	M
One single-size blanket or comforter on each single bed, one double-size blanket or comforter or alternatively two single-size blankets or comforters on each double bed (can be removed and hygienically stored during the hot months of the year and replaced with a light summer duvet)	M	M	M	M	M
Bed linens comprising bed sheets, pillow covers and duvet covers	M	M	M	M	M
Any blanket or comforter must be put inside an enclosed duvet cover; guests using their beds shall not have to touch any items that have not been washed prior to their arrival	M	M	M	M	M

100

100

80

80

10

The total height is the sum of the mattress and spring
The total height is the sum of the mattress and spring system (e.g. slatted frame)

Invoice and payment receipt proving the date of purchase
Certificate from cleaning company; the mattress must

One or more additional pillows per guest (in clean pillow covers) either on bed or in the closet	10	10	M	M	M	10
Additional blankets available upon request	5	5	M	M	M	5
Availability of at least three different pillow types upon request	20	20	20	20	M	20
Anti-allergenic bed linens, pillows and blankets available upon request	10	10	10	M	M	10
Baby cot with clean mattress and full set of clean fitting bed linens available upon request	10	M	M	M	M	10
Black-out curtain or shutters	M	M	M	M	M	
Sound-proofing of rooms ensuring noise level less than 35 dB	M	M	M	M	M	

Properly cleaned and delivered by front office or
Properly cleaned and delivered by front office or

Bedroom features

Printed or electronic guest directory	M	M	M	M	M	
Coat hanger (wall-mounted or otherwise)	M	M	M	M	M	
At least one seat per room	M	M				
One seat per person staying in the room (e.g 2 seats in double room, 3 seats in triple room etc.)	5	5	M	M	M	5
Comfortable seating such as sofa or armchair or daybed with coffeetable	5	5	5	5	M	5
Table or similar surface	M	M				
Work desk or similar surface with appropriate chair suitable for working with a laptop, proper lighting and easily accessible power sockets	10	10	M	M	M	10
Luggage rack	5	5	5	5	M	5
Closet with sufficient storage space and sufficient number of hangers	M	M	M	M	M	
Different types of hangers for different types of clothes (trousers, skirts etc.)					M	
Night stand(s) next to the bed(s)	M	M	M	M	M	
Bedside reading lamps	M	M	M	M	M	
Night light	2	2	2	2	2	2
Pen or pencil and notepad	1	1	1	M	M	
Master switch next to the bed for switching on and off all lights in the room	1	1	1	1	1	1

Seats include chairs, armchairs, sofas, stools etc.
Seats include chairs, armchairs, sofas, stools etc.

"Open-closet" arrangements also acceptable

Master switch next to the room entrance for switching on and off all lights in the room	1	1	1	1	1	1
At least one power socket free to be used by the guest	M	M	M	M	M	
Individual temperature control for both heating and cooling (thermostat or similar)	10	10	10	M	M	10
Dressing mirror			M	M	M	
Trash bin	M	M	M	M	M	
Two or three trash bins for separating recyclable trash	3	3	3	3	3	3
TV set tuned to show a selection of channels and remote control	5	M	M	M	M	5
In-room safe	8	8	8	8	8	8
In-room laptop-sized safe with power outlet	12	12	12	12	12	12
Refrigerator for guest's use	12	12	12	12	12	12
Free beverages and snacks on offer in the refrigerator or elsewhere in the room	8	8	8	8	8	8
Minibar with items for sale	5	5	5	5	5	5
Kettle and/or tea/coffee-making facilities	12	12	12	12	12	12
Iron and ironing board	12	12	12	12	12	12

TV sets can be omitted in case of special hospitality concepts (e.g. a hideaway)

Private bathroom

Minimum bathroom features: toilet (WC), washbasin with storage space and mirror, proper lighting, bathtub or shower with non-slippery surface, toilet paper (+reserve), soap, shampoo and body wash, power socket with protective lid, glass for toothbrush, trash bin			M	M	M	M	
All toiletries (such as soap, shampoo and body wash) will be offered in refillable dispensers; individual mini toiletries are not allowed due to their environmental impact	M	M	M	M	M	M	
Ventilation	M	M	M	M	M	M	
Thorough cleaning for avoiding mold	M	M	M	M	M	M	
Body towels and face towels (one per guest)	M	M	M	M	M	M	
Hand towels (one per guest)	3	3	3	3	M		3
Pool/beach towels	5	5	5	5	5		5
Bathrobes	10	10	10	10	10		10
Slippers	10	10	10	10	10		10

Businesses can apply for an exemption until their stock in mini toiletries has been used up

Sufficient towel hangers	M	M	M	M	M	
Hairdryer	5	5	5	M	M	5
Bathtub AND separate shower stall	30	30	30	30	30	30
Massage shower	20	20	20	20	20	20
Two washbasins instead of one	20	20	20	20	20	20
Bidet	5	5	5	5	5	5
Hi-tech shower toilet	30	30	30	30	30	30
Safety handles in shower and/or bathtub	2	2	2	2	2	2
Separate enclosed toilet cabin	20	20	20	20	20	20
Magnifying mirror	5	5	5	5	5	5
Telephone extension in bath	2	2	2	2	2	2
Bathroom scale	5	5	5	5	5	5
Multilingual card encouraging guests to reuse towels	M	M	M	M	M	

Kitchen or kitchenette (in apartments and studios)

Stove and/or oven and/or microwave oven	M	M	M	M	M	
Refrigerator	M	M	M	M	M	
Cookware and cooking utensils	M	M	M	M	M	
Dishware and cutlery	M	M	M	M	M	
Dining table with dining chairs	M	M	M	M	M	
Kitchen sink	M	M	M	M	M	
Small kitchen appliances (e.g. coffeemaker, toaster, kettle)	10	10	10	10	10	10

not mandatory in the case of

Housekeeping

Strict cleaning protocol with written instructions and the proper cleaning materials	M	M	M	M	M	
Daily cleaning of rooms	M	M	M	M	M	
Evening turndown service	30	30	30	30	M	30
Daily change of towels upon request	M	M	M	M	M	
Change of bedlinens at least once every week	M	M	M			
Change of bedlinens at least every three days				M	M	
Daily change of bedlinen upon request				M	M	
Laundry of clothes within 24 hours	5	5	5	M	M	5
Iron and ironing board available upon request	M	M	M	M	M	
One-hour ironing service	5	5	5	M	M	5
Shoeshining service or machine	5	5	5	5	M	5

Guidelines to housekeepers and their cleaning trolley or
 Guests should be able to opt
 Guests should be able to opt
 Guests should be able to opt
 Guests should be able to opt

Foodservice

Adherence to foodservice safety rules (HACCP) through the proper instructions manual and staff training	M	M	M	M	M
Breakfast served in restaurant or dedicated breakfast room	M	M	M	M	M
Minimum duration of breakfast service					

3 hours M M
2 hours M M M

Basic breakfast	M				
Enriched breakfast	20	M	M		
Breakfast buffet or breakfast à la carte	40	40	40	M	M
In-room breakfast	15	15	15	15	M
At least five breakfast items based on locally produced ingredients and local recipes	30	30	30	30	30
Restaurant serving lunch and dinner	50	50	50	M	M
Regional cuisine based on locally produced ingredients and local recipes	30	30	30	30	30
Additional restaurants, each with a distinct concept	150	150	150	150	150

Items include hot beverages such as tea, coffee and milk; bread and rolls with butter; Added items such as egg dishes, cereals, yogurt and

50 points per restaurant 50

Child-friendly food options	M	M	M	M	M
Catering to special dietary needs (e.g. halal, vegan, lactose-free, gluten free dishes)	50	50	50	M	M
Room service	120	120	120	120	

Maximum number of points

Maximum number of points

16 hours serving beverages and snacks, 12 hours serving food 80 80 80 M 80
24 hours serving food and beverages 120 120 120 120 M 120

Additional bars (besides the lobby bar), each with a distinct concept	50	50	50	50	50
---	----	----	----	----	----

Maximum number of points achievable

25 points per bar 25

Function space

Function rooms of at least 50 sqm (such as meeting rooms, boardrooms, ballrooms etc.)	120	120	120	120	120
---	-----	-----	-----	-----	-----

40 points per room

40

Maximum number of points achievable

Leisure features

Outdoor swimming pools	230	230	230	230	230
------------------------	-----	-----	-----	-----	-----

Points per pool

100

Extra points if one of the pools is heated

30

Indoor heated swimming pool	130	130	130	130	130
-----------------------------	-----	-----	-----	-----	-----

130

Gym with at least 4 different exercise machines	80	80	80	80	80
---	----	----	----	----	----

Activities and facilities offered by the accommodation establishment	400	400	400	400	400
--	-----	-----	-----	-----	-----

Maximum number of points achievable

Each counted separately: Tennis court, basketball court, soccer field etc.

60

Bicycles

60

Watersports

100

Beach facilities

100

Golf

100

Horseback riding

100

Falconry

100

Ski facilities

100

Spa services	300	300	300	300	300
--------------	-----	-----	-----	-----	-----

Maximum number of points

Massage and other body treatments

100

Facials, manicures and/or pedicures

80

Each counted separately: sauna, steam bath, whirlpool and similar

80

Thermal baths

100

Training sessions offered to guests (e.g. yoga, aerobics, pilates etc.)	80	80	80	80	80
---	----	----	----	----	----

80

Kids' playground	80	80	80	80	80
------------------	----	----	----	----	----

80

Kids' playroom	80	80	80	80	80
----------------	----	----	----	----	----

80

Animation programme for kids provided by childcare professionals	80	80	80	80	80
--	----	----	----	----	----

80

Animation programme for adults	80	80	80	80	80
--------------------------------	----	----	----	----	----

80

Cultural activities	80	80	80	80	80
---------------------	----	----	----	----	----

80

Casino	100	100	100	100	100
--------	-----	-----	-----	-----	-----

100

Other criteria

Doctor on call	M	M	M	M	M
Shop(s) operating on the premises	60	60	60	60	60

Points per shop

20

Maximum number of points

Certifications, guest feedback and web presence

Certifications already mentioned: staff training, HACCP, staff language skills, mattress cleaning

Environmental certifications concerning energy and water consumption, recycling, waste-water treatment, use of renewable energy, sustainability labels	300	300	300	300	300
--	-----	-----	-----	-----	-----

Points per certificate

100

Maximum number of points achievable

Disinfestation certificate					
Halal hospitality certification	100	100	100	100	100
Quality management systems such as ISO 9001:2008 or similar	200	200	200	200	200

Points per certificate

100

Maximum number of points achievable

Operating a complaint management system	50	50	50	M	M
Systematic analysis of guest reviews and/or questionnaires	50	50	50	M	M
Own website with updated information, realistic pictures, detailed descriptions of room amenities and the facilities and services on offer, detailed directions for reaching the establishment	50	M	M	M	M
Website available in foreign languages	90	90	90	M	M

Points per language

30

Maximum number of points

Website with direct booking option	50	50	50	50	50
------------------------------------	----	----	----	----	----

50

Total achievable points	###	###	###	###	###
--------------------------------	------------	------------	------------	------------	------------

Star/Shanyrak/Tunduk categories

*	**	***	****
---	----	-----	------

Hotels

Number of points for achieving the respective category	400	600	900	###	###
Number of points for achieving the "Elite" designation in the respective category (+40%)				###	###

Guesthouses Number of points for achieving the respective category 300 400 550 700

Additional criteria categories for hostels

Hostels may comprise both regular "hotel-style" rooms and dormitories sleeping four or more people. The aforementioned criteria apply to the former (hotel-style rooms), whereas classification standards for hostel dormitories are provided below.

Categc No.	Standard	Star/Shanyrak/Tunduk categories				Points	Calculation fields		Remarks
		*	**	***	****		Input	Output	

Dormitories

Dormitories are bedrooms sleeping between 4 and 8 people either in regular or in bunk beds.

Minimum space per bed in dormitories					
3 sqm per bedspace	M				
3.5 sqm per bedspace	20	M			
4 sqm per bedspace	25	25	M		
5 sqm per bedspace	30	30	30	M	
Minimum dimensions for single beds: 80 cm x 190 cm	M	M			
Minimum dimensions for single beds: 90 cm x 190 cm	20	20	M	M	
Everything an arriving guest finds on their bed must be clean and hygienic; any decorative items or bedthrows that are not being washed before the arrival of each guest are strictly prohibited	M	M	M	M	
One pillow oper bed	M	M	M	M	
Annual cleaning or replacement of pillows	M	M	M	M	
Hygienic pillow protection encasement	10	10	M	M	

One single-size blanket or comforter per bed (can be removed and hygienically stored during the hot months of the year and replaced with a light summer duvet)	M	M	M	M
Bed linens comprising bed sheets, pillow covers and duvet covers	M	M	M	M
Any blanket or comforter must be put inside an enclosed duvet cover; guests using their beds shall not have to touch any items that have not been washed prior to their arrival	M	M	M	M
One or more additional pillows per guest either on bed or in the closet	10	10	M	M
Additional blankets and pillows (in clean pillow covers) available upon request	5	5	M	M
Body towels and face towels (one per guest)	M	M	M	M
Change of linen (towels, bed linens)				

every 3 days M M
every 2 days 20 20 M M

Seats (chairs, armchairs etc.)				
--------------------------------	--	--	--	--

1 seat per two bedspaces M M
1 seat per one bedspace 20 20 M M

1 locker per bedspace with minimum dimensions 50x60x100 cm	M	M	M	M
1 bedside reading lamp	M	M	M	M
1 power socket per bedspace	M	M	M	M
Black-out curtain or shutters, trash can	M	M	M	M
All dormitories are well maintained, clean and all their features and equipment are fully operational	M	M	M	M
There is daylight in all dormitories	M	M	M	M
Odor-free	M	M	M	M
Proper heating and air-conditioning or use of ceiling fans for achieving a temperature of around 20°C				
Drinking water offered in the room free of charge	M	M	M	M
Provision of fresh and clean air by opening window and/or balcony or through air-conditioning or ventilation	M	M	M	M
WiFi reception in dormitories	M	M	M	M

fountain

Daily cleaning of dormitories	M	M	M	M
-------------------------------	---	---	---	---

At least one regular room (single or double) should be wheelchair-accessible as should the hostel's public spaces, corridors and elevators.

Shared bathroom facilities

Bathroom facilities may be either attached to each dormitory or in a separate part of the building or they can even be split up, for instance, the washbasins being within the dormitory and the toilets and showers down the corridor. If the bathroom facilities are detached from the dormitory, they should be clearly marked as being either for men or women.

Hot water available 24 hours a day	M	M	M	M
Properly lit during the night	M	M	M	M
Non-slippery flooring	M	M	M	M
Toilets in enclosed cabins each with locking door, toilet paper, toilet seat, trash bin with lid, toilet brush and coat hooks; sufficient ventilation; properly tiled; urinals in men's toilets, as well	M	M	M	M
Showers with soapholder and coat hooks; properly tiled; proper ventilation	M	M	M	M
Washbasins each with soap dispenser, mirror, power socket, trash bin with lid, sufficient space and proper lighting; properly tiled	M	M	M	M
Number of washbasins per bedspaces				

<i>2 washbasins per 8 bedspaces</i>	M	M		
<i>3 washbasins per 8 bedspaces</i>	20	20	M	
<i>4 washbasins per 8 bedspaces</i>	30	30	30	M

Number of showers per bedspaces				
<i>2 showers per 8 bedspaces</i>	M	M		
<i>3 showers per 8 bedspaces</i>	20	20	M	
<i>4 showers per 8 bedspaces</i>	30	30	30	M

Number of toilets per bedspaces				
<i>2 toilets per 8 bedspaces</i>	M	M		
<i>3 toilets per 8 bedspaces</i>	20	20	M	
<i>4 toilets per 8 bedspaces</i>	30	30	30	M

At least one shower, one washbasin and one toilet must be wheelchair accessible.	M	M	M	M
Hairdryer (points per piece)	15	15	15	15
Magnifying mirror	10	10	10	10
Shower stool	5	5	5	5

Additional criteria categories for campsites

Categc No.	Standard	Star/Shanyrak/Tunduk categories				Points	Calculation fields		Remarks
		*	**	***	****		Input	Output	

Camping options

Campsite guests should have several options to choose from when planning their stay. All following options should be considered by campsite operators regardless of their classification.

Tents
Campers
Caravan trailers
Hotel bus/Rotel bus
Bungalows
Yurts

Sanitary facilities

Sanitary facilities protected from weather conditions (rain, sun., wind, chilly temperatures) and ensuring hygiene, privacy and safety	M	M	M	M
Clearly marked separate sanitary facilities for men and women comprising showers, washbasins and toilets	M	M	M	M
Hot water available 24 hours a day	M	M	M	M
Properly lit during the night	M	M	M	M
Non-slippery flooring	M	M	M	M

Toilets in enclosed cabins each with locking door, toilet paper, toilet seat, trash bin with lid, toilet brush and coat hooks; sufficient ventilation; properly tiled; urinals in men's toilets, as well	M	M	M	M
Showers with soapholder and coat hooks; properly tiled	M	M	M	M
Washbasins each with soap dispenser, mirror, power socket, trash bin with lid, sufficient space and proper lighting; properly tiled; sufficient distance between washbasins (approx. 1 m)	M	M	M	M
Toilets: minimum required number				
<i>1 toilet per 4 pitches</i>				M
<i>1 toilet per 5 pitches</i>			M	
<i>1 toilet per 6 pitches</i>	M	M		
Showers: minimum required number				
<i>1 shower per 4 pitches</i>				M
<i>1 shower per 5 pitches</i>			M	
<i>1 shower per 6 pitches</i>		M		
<i>1 shower per 7 pitches</i>	M			
Washbasins: minimum required number				
<i>1 washbasin per 4 pitches</i>				M
<i>1 washbasin per 5 pitches</i>		M	M	
<i>1 washbasin per 6 pitches</i>	M			
At least one shower, one washbasin and one toilet must be wheelchair accessible.	M	M	M	M
1 kid's toilet + 1 kid's washbasin	30	30	30	M
Baby changing facilities	30	30	M	M
Hairdryer (points per piece)	15	15	15	15
Magnifying mirror	10	10	10	10
Shower stool	5	5	5	5

Men's toilets can be partly