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FOREIGN EXPERIENCE IN STATE REGULATION OF SUSTAINABLE TOURISM DEVELOPMENT AND THE POSSIBILITIES OF ITS APPLICATION IN UZBEKISTAN

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Abstract. This article examines advanced international experience in the state regulation of sustainable tourism development and the possibilities of applying it in Uzbekistan. The study employs a systematic approach, comparative analysis, statistical grouping, induction and deduction, and logical generalization. The information base of the study consists of official reports and regulatory legal documents published by the OECD, UN Tourism, the European Commission, the Global Sustainable Tourism Council, the World Bank, and the competent authorities of foreign countries. Institutional governance, targeted financing, tourism levies, destination management organizations, the "high value–low volume" model, and sustainability indicators applied in Spain, France, the United Kingdom, Bhutan, and Costa Rica are comparatively assessed. Based on the research findings, directions for adapting these mechanisms to Uzbekistan's natural, historical-cultural, and institutional characteristics are substantiated. Scientific and practical recommendations are developed to improve regional tourism governance, monitor tourism carrying capacity, develop targeted financing mechanisms, and introduce a national system of sustainable tourism indicators.

Keywords: sustainable tourism, state regulation, international experience, tourism levy, destination management organization, targeted financing, tourism carrying capacity, sustainability indicators.

INTRODUCTION

In the global economy, tourism has become one of the important instruments for promoting economic growth, ensuring employment, fostering regional development, and promoting natural and cultural heritage. According to UN Tourism, the number of international tourist arrivals reached 1.52 billion in 2025, representing a 4% increase compared with 2024. However, the rapid expansion of tourist flows has also created challenges such as increasing pressure on natural resources, growing visitor pressure on historical and cultural sites, disruption of ecological balance, and insufficient consideration of the interests of local communities. Therefore, harmonizing economic efficiency with environmental and social sustainability has become increasingly important in tourism development.

Under contemporary conditions, the state's functions in regulating the tourism sector are no longer limited to traditional administrative and financial instruments. They also encompass monitoring the carrying capacity of tourist destinations, introducing environmental standards, ensuring the targeted use of tourism levies, developing public–private sector cooperation, and evaluating outcomes based on sustainability indicators. The OECD's 2026 study emphasizes the need to formulate tourism policy by integrating economic development, digital transformation, environmental sustainability, and regional interests.

In Uzbekistan, reforms are also being implemented to enhance the role and significance of tourism in the economy, diversify tourism services, and develop modern infrastructure. Presidential Decree No. PF-87 of May 15, 2025, establishes priority objectives for increasing tourist flows and expanding the range of services. Implementing these objectives in accordance with the principles of sustainable development requires the study of advanced international experience. Therefore, the purpose of this study is to conduct a comparative analysis of international experience in state regulation of the tourism sector and to develop scientific and practical proposals for applying its effective mechanisms in the context of Uzbekistan.

LITERATURE REVIEW

The sustainable development of the tourism sector and its state regulation have been examined in the international academic literature through various theoretical and methodological approaches. R.W. Butler developed the tourism area

life cycle concept and demonstrated that uncontrolled growth in tourist flows may cause a destination to enter a stage of stagnation or decline. This approach highlights the need to determine the carrying capacity of tourist destinations and to plan their development from a long-term perspective. C.M. Hall examined public policy, institutional relations, and stakeholder cooperation in tourism planning as an integrated system, paying particular attention to the coordinating role of the state.

In their studies, B. Bramwell and B. Lane emphasized that sustainable tourism governance should be based on cooperation among the state, the private sector, local communities, and civil society. According to the scholars, governance effectiveness depends not only on the distribution of formal powers but also on stakeholder participation in decision-making processes. R. Nunkoo examined the roles of trust, power, and social capital in tourism governance and demonstrated that local residents' trust in public policy is an important condition determining the effectiveness of sustainable tourism programs [4]. D. Scott, C.M. Hall, and S. Gössling investigated the relationship among tourism, climate change, and environmental sustainability and demonstrated the need to prioritize adaptation measures and the reduction of environmental impacts in public policy.

Research conducted by international organizations has further developed this issue from the perspective of practical regulatory mechanisms. OECD studies emphasize the need to integrate tourism policy with regional governance, digitalization, skilled workforce development, and the "green" transformation. UN Tourism interprets sustainable tourism as a development model based on the integration of economic efficiency, the conservation of natural and cultural resources, and the protection of local community interests. The criteria developed by the Global Sustainable Tourism Council systematize indicators for destination management, socioeconomic benefits, cultural heritage, and environmental impacts.

In Uzbekistan, issues related to tourism development, the utilization of its economic potential, and the formation of sustainable tourism products have been addressed in the works of N.Sh. Mansurova, O. Radjabov, I.O. Davronov, and other researchers. These studies primarily focus on the country's tourism potential, strategic communications, regional tourism development, and the promotion of tourism services. In addition, the institutional and legal foundations of state policy in the tourism sector are reflected in the relevant regulatory legal acts of the Republic of Uzbekistan.

Although existing academic studies have extensively examined the theoretical foundations, environmental impacts, and governance principles of sustainable tourism, the comprehensive adaptation to Uzbekistan's institutional and regional characteristics of such mechanisms used in foreign countries as tourism levies, destination management organizations, the "high value – low volume" model, targeted financing, and sustainability indicators remains insufficiently studied. This research gap determines the need to comparatively assess international experience and develop scientific and practical proposals for applying its effective mechanisms in Uzbekistan.

RESEARCH METHODOLOGY

The primary objective of the study is to examine advanced regulatory practices developed in foreign countries, identify their effective elements, and scientifically substantiate the possibilities for their application in Uzbekistan. To achieve this objective, the study employed systemic and comparative analysis, statistical grouping, dynamic series analysis, induction and deduction, content analysis, scientific abstraction, expert-logical assessment, and logical generalization.

Based on the systemic approach, organizational and economic relations among government bodies, the private sector, DMOs, local authorities, and communities were examined as an integrated governance mechanism. Through comparative analysis, the state regulation models of tourism in Spain, France, the United Kingdom, Bhutan, and Costa Rica were compared according to institutional structure, distribution of powers, financing, tourism levies, environmental restrictions, certification, and destination management criteria.

Based on statistical and dynamic analysis, trends in tourist flows, tourism service exports, the sector's share in GDP, public funding, and infrastructure development in Uzbekistan were assessed. Through content analysis, national regulatory legal acts and materials published by the OECD, UN Tourism, the European Union, GSTC, and the World Bank were examined. Using induction and deduction, the applicability of general patterns identified in international experience to national conditions was determined, while scientific abstraction and logical generalization were used to develop proposals for improving the system of state regulation of sustainable tourism.

ANALYSIS AND RESULTS

The rapid recovery of the global tourism market is creating new requirements for the system of state regulation of tourism. According to OECD data, the number of international tourist arrivals in OECD member countries increased by 8.1% in 2024, reaching 819.5 million. In these countries, tourism's direct contribution accounted for an average of 4.0% of gross domestic product and 19.3% of service exports. Alongside the growing economic importance of tourism, challenges associated with pressure on natural resources, overcrowding at historical and cultural sites, seasonality, and local infrastructure are also intensifying. Therefore, public policy is increasingly shifting from a model focused on increasing tourist numbers toward a sustainable, manageable, and high-value tourism model.

The European Union's Agenda for Tourism 2030 identifies the "green" and digital transitions, resilience to crises, inclusiveness, professional skills, and effective governance as priority areas. In Spain, the "Smart Tourism Destination" model introduced by SEGITTUR provides for a comprehensive assessment of destinations in terms of governance, innovation, technology, sustainability, and accessibility. Within this approach, digital technologies are used as instruments for monitoring tourist flows, ensuring the efficient use of resources, and improving the quality of destination management.

The experiences of Scotland and Bhutan are of particular importance in the financial regulation of sustainable tourism. Scotland's 2024 legislation grants local authorities the power to introduce a tourism levy on overnight accommodation. Revenues generated from the levy are designated for the development of local tourism infrastructure and services. In Bhutan, a Sustainable Development Fee based on the "high value – low volume" principle is applied. According to official data, the fee for adult international tourists amounts to USD 100 per night, and the revenues generated are directed toward financing social, infrastructure, and environmental programs (table 1).

Table 1
Comparative Characteristics of State Regulation Models for Sustainable Tourism in Foreign Countries

Country or Organization	Main Regulatory Instrument	Relevance for Uzbekistan
European Union	Approach based on "green" and digital transformation	Coordination of tourism, environmental, transport, and regional development programs
Spain	"Smart Tourism Destination" model and digital monitoring	Introduction of data-driven destination management in Samarkand, Bukhara, and Khiva
Scotland	Local tourism levy and targeted use of revenues	Creation of an additional source of financing for destinations with high tourism pressure
Bhutan	"High value – low volume" model and Sustainable Development Fee	Development of high-value tourism in environmentally sensitive areas
Costa Rica	Government payments for environmental services	Harmonization of ecotourism development and nature conservation interests
GSTC	System of economic, social, cultural, and environmental criteria	Development of national sustainable tourism indicators and a certification system

According to the results of the analysis, although foreign models are based on different organizational and financial instruments, their common feature lies in assessing the economic outcomes of tourism in conjunction with its environmental and social impacts. In the Spanish experience, digital management is given priority; in Scotland, regional financing; in Bhutan, high-value tourism; in Costa Rica, environmental incentives; and within the GSTC system, the comprehensive assessment of outcomes through a set of indicators. These experiences provide an important scientific and practical basis for improving destination management, monitoring tourism pressure, and developing targeted financing mechanisms in Uzbekistan.

Based on the systematization of international experience, the instruments of state regulation of sustainable tourism were classified into six interrelated groups. These include institutional, regulatory and legal, economic and financial, digital and information, environmental, and socio-cultural instruments. The coordination of these instruments within a unified system contributes to ensuring a balance between economic interests and environmental and social priorities in tourism development (figure 1).

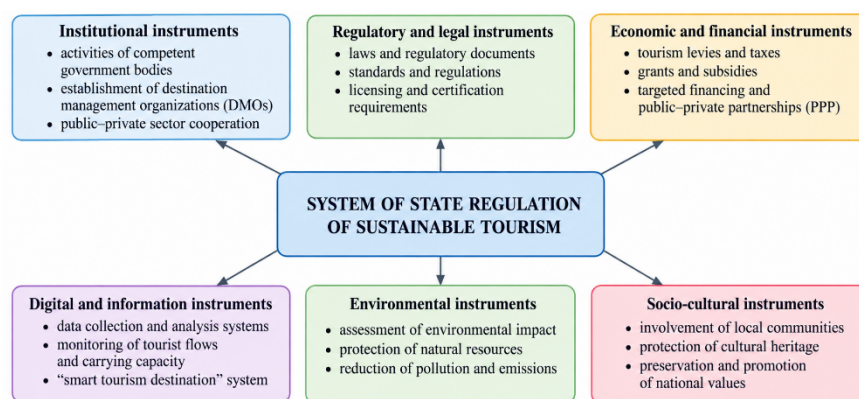


Figure 1. Systematic classification of government regulatory instruments for sustainable tourism.

Figure 1. Systematic Classification of Government Regulatory Instruments for Sustainable Tourism.

According to the data presented in **Figure 1**, the regulation of sustainable tourism is not a set of separate administrative measures, but rather an interconnected and comprehensive management system. While institutional instruments define the powers and responsibilities of stakeholders, regulatory and legal instruments establish the general rules and standards governing their activities. Economic and financial instruments ensure the financing of sustainable projects, whereas digital and information instruments make it possible to monitor tourist flows and the carrying capacity of destinations. Environmental and socio-cultural instruments are aimed at protecting natural resources, the interests of local communities, and cultural heritage. The coordinated application of these instruments makes it possible to achieve economic efficiency, social inclusiveness, ecological balance, and the preservation of cultural heritage.

Along with systematizing international experience, the level of development of sustainable tourism management mechanisms in the selected countries was compared using an **author-developed scoring method**. The assessment was conducted according to five criteria: institutional coordination, targeted financing, digital monitoring, environmental regulation, and local community participation. Each criterion was rated on a scale from 0 to 3 points: **0 points** – the mechanism was not identified; **1 point** – partially applied or applied at the local level; **2 points** – developed; **3 points** – systematic and institutionalized. Equal weights were assigned to all criteria, with the maximum total score set at **15 points**.

	Institutional coordination	Targeted financing	Digital monitoring	Environmental regulation	Local community participation	Total (15 points)
Spain	3	2	3	3	2	13
Scotland	2	3	1	2	3	11
Bhutan	3	3	1	3	2	12
Costa Rica	2	3	1	3	3	12

0 – not identified 1 – partially applied 2 – developed 3 – systematic and institutionalized

Figure 2. Comparative Assessment of Sustainable Tourism Management Mechanisms in Selected Countries.

Figure 2. Comparative Assessment of Sustainable Tourism Management Mechanisms in Selected Countries

According to the results presented in Figure 2, Spain achieved the highest score, with 13 points. This is attributable to the integration of governance, digital technologies, and sustainability principles into a unified system within the "Smart Tourism Destination" model. Although Bhutan and Costa Rica each received 12 points, their strengths differ: Bhutan demonstrates strong centralized governance, the Sustainable Development Fee, and environmental restrictions, whereas Costa Rica has well-developed environmental financing and local community participation. Scotland's score of 11 points is explained by the development of local tourist levy and public consultation mechanisms, while digital monitoring remains relatively limited within the assessed model. These scores do not represent an official international ranking but rather constitute an author-developed assessment intended to compare the mechanisms reflected in official documents using a unified set of criteria.

Table 2
Opportunities for Adapting Foreign Experience to the Conditions of Uzbekistan

Foreign Experience	Area of Application in Uzbekistan	Implementation Mechanism	Expected Outcome	Priority
Spain's DTI Model	Samarkand, Bukhara, Khiva, and Shahrisabz	Establishment of regional DMOs, introduction of digital diagnostics and tourist flow monitoring	Improved quality of regional governance and increased efficiency of resource utilization	High
Scotland's Tourist Levy	Historic centers with high tourist pressure	Establishment of a legal framework, public consultation, and procedures for the targeted use of revenues	Creation of a local source of funding for infrastructure and heritage sites	High
Bhutan's "High Value – Low Volume" Model	Zaamin, Chimgan, and environmentally sensitive areas	Pilot introduction of carrying-capacity limits, advance reservations, and differentiated levies	Reduced environmental pressure and increased revenue per tourist	Medium–High
Costa Rica's Payment for Environmental Services Program	Ecotourism and protected natural areas	Establishment of nature conservation agreements with landowners and local communities	Harmonization of natural resource conservation and local income generation	High
GSTC Sustainability Criteria	Hotels, tour operators, and tourist destinations	Development of national indicators, self-assessment mechanisms, and a "green certificate" system	Measurement of sustainability outcomes and enhanced reliability of tourism services	High
European Union's Integrated Approach	National and regional tourism programs	Coordination of tourism, environmental, transport, cultural, and digitalization programs	Improved cross-sectoral governance and greater effectiveness of government programs	High

According to the data presented in **Table 2**, foreign mechanisms should not be directly replicated but rather adapted to Uzbekistan's territorial, institutional, and financial conditions. In particular, regional DMOs, targeted tourist levies, a unified system of sustainability indicators, and digital monitoring of tourist pressure are priority instruments that can be introduced in the short and medium term. The **"high value – low volume"** model, however, should be applied selectively in environmentally sensitive areas with limited ecological carrying capacity rather than in mass tourism destinations.

Based on the analysis conducted, an improved mechanism for the **state regulation of sustainable tourism in Uzbekistan** was developed. This mechanism integrates governance actors, general principles, a six-stage management cycle, a package of adaptable instruments, and outcomes within a unified system.

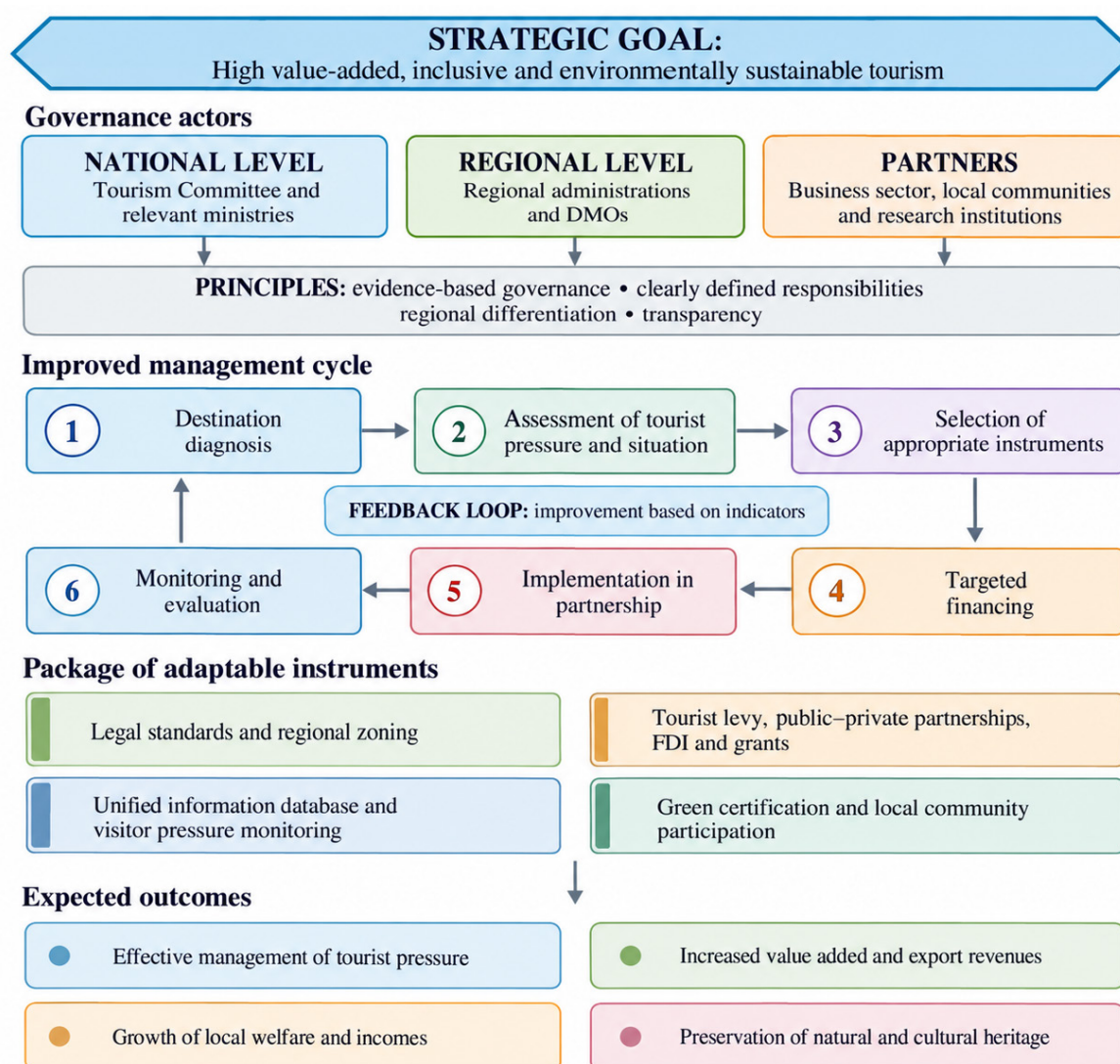


Figure 2. Improved Mechanism for State Regulation of Sustainable Tourism in Uzbekistan

The proposed mechanism differs from existing approaches primarily in the introduction of a continuous management cycle that begins with destination diagnosis and the assessment of tourist pressure. Monitoring results do not remain merely as final reports; rather, they serve as a basis for adjusting regulatory instruments and financing priorities. At the national level, strategies and standards are established; regional DMOs carry out coordination at the local level; while businesses, local communities, and research institutions participate in the development and implementation of decisions. As a result, opportunities are created for the effective management of tourist pressure, increased value added and export revenues, expanded local employment, and the preservation of natural and cultural heritage.

CONCLUSION AND RECOMMENDATIONS

The results of the study demonstrate that, under contemporary conditions, state regulation of the tourism sector is shifting from the traditional approach focused solely on increasing tourist flows and economic revenues toward a comprehensive management model based on sustainability, inclusiveness, regional balance, and the preservation of natural and cultural resources. The approaches of OECD, UN Tourism, the European Union, GSTC, and the World Bank, as well as the comparative analysis of the experiences of Spain, France, the United Kingdom, Bhutan, and Costa Rica, confirmed that the key conditions for effective tourism management include the clear allocation of institutional responsibilities, the development of destination management organizations, regular assessment of tourist pressure, targeted financing, and the introduction of measurable sustainability indicators.

In adapting foreign experience to the conditions of Uzbekistan, it is advisable not to replicate the model of a particular country in its entirety, but rather to selectively apply those elements that are compatible with national tourism policy, the

resource potential of regions, and institutional capacities. From this perspective, in destinations with high tourist flows, such as Samarkand, Bukhara, Khiva, and Shahrizabz, it is necessary to institutionalize destination management organizations and clearly define the responsibilities of local authorities, business entities, and the public. In environmentally sensitive areas, the selective application of Bhutan's "high value – optimal volume" approach can reduce tourist pressure and increase the economic return generated per tourist.

Overall, the developed improved mechanism will contribute not only to increasing the economic efficiency of tourism in Uzbekistan but also to stimulating the growth of local employment and incomes, preserving natural and cultural heritage, and ensuring the long-term competitiveness of tourist destinations. This approach provides a scientific and practical basis for achieving the targets set for 2030 not merely by increasing tourist flows, but through high value added, effective regional governance, and sustainability criteria.

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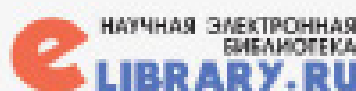
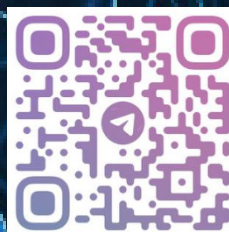
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