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Artificial Intelligence in Tourism Policy: Governance Opportunities and Risks for Destinations

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ABSTRACT

The rapid expansion of artificial intelligence in tourism is generating new opportunities for destinations to improve planning, service delivery, visitor management, and strategic decision-making. At the same time, it raises important public policy concerns related to governance capacity, data use, transparency, inclusion, and regulation. This paper investigates how destination-level policy frameworks can shape the adoption and governance of AI in tourism. It proposes that AI should be analyzed not only as a business innovation, but also as a policy domain requiring institutional preparedness and multi-stakeholder coordination. The study identifies the principal governance opportunities associated with AI in tourism, such as enhanced forecasting, real-time destination management, improved sustainability monitoring, and more responsive public services, while also examining risks including privacy violations, algorithmic discrimination, digital dependency, and unequal access to technological capabilities. The paper advances a policy framework for assessing destination readiness in the governance of AI and discusses its implications for competitiveness, sustainability, and inclusive development. The findings highlight that the policy value of AI in tourism depends on the ability of governments to establish clear regulatory principles, strengthen institutional capacities, and align technological innovation with broader public goals.

Keywords: Artificial Intelligence, Tourism Governance, Smart Tourism
JEL Classifications: L83, O33, O38

1. INTRODUCTION

Artificial intelligence (AI) is becoming an increasingly influential force in the transformation of the tourism sector. Across both private and public settings, AI-based systems are being used for demand forecasting, recommendation and personalization, dynamic pricing, automated customer service, visitor-flow monitoring, and real-time decision support. Recent tourism scholarship shows that AI is no longer confined to isolated firm-level applications; it is progressively affecting how destinations organize information, respond to demand volatility, and design more data-driven forms of management (García-Madurga and Grilló-Méndez, 2023; OECD, 2024a; Wong et al., 2023).

Most of the tourism literature has approached AI and digital transformation through the lenses of innovation, competitiveness, service enhancement, and smart tourism development. This work has been valuable in showing how digital infrastructures and intelligent systems can improve operational efficiency, support forecasting, and personalize the visitor experience. At the same time, recent studies on smart destinations indicate that the destination itself must be understood as a wider ecosystem involving technology, infrastructure, quality of life, multiple

stakeholder groups, and governance arrangements rather than as a mere technological platform (Cerdá-Mansilla et al., 2024; Gajdošik, 2022).

However, the growing use of AI in tourism raises a broader set of issues that cannot be reduced to technological adoption or business performance. As AI systems increasingly influence how destinations communicate, classify, predict, prioritize, and allocate attention, they also affect matters of data governance, transparency, accountability, privacy, consumer protection, labor adjustment, and inclusion. The policy relevance of these issues has been explicitly recognized in recent international work, which emphasizes that AI in tourism creates both opportunities and risks for tourists, businesses, destinations, governments, and workers, particularly where data access, market concentration, and regulatory capacity are uneven (OECD, 2024a; UNESCO, 2022).

Despite this, the policy dimension of AI remains underdeveloped in tourism research. Much of the emerging literature continues to emphasize firm adoption, marketing applications, consumer interaction, and the potential of generative AI to support travel planning and service automation (Carvalho and Ivanov, 2024; Wong et al., 2023). While these contributions are important, they give less sustained attention to the role of public institutions and destination authorities in shaping the conditions under which AI is implemented, regulated, and evaluated. This is a significant gap because the consequences of AI in tourism depend not only on technical performance, but also on the governance arrangements, institutional capabilities, and normative principles that frame its deployment. This gap becomes especially important at the destination level. Tourism destinations are not governed by a single actor; they are multi-actor systems involving local and regional governments, destination management organizations, private firms, technology providers, residents, and visitors. For that reason, destination governance has long been associated with coordination, participation, strategic planning, sustainability, and the balancing of economic and social interests. Recent research on smart governance in tourism shows that data-driven and technologically enabled approaches may help destinations address challenges such as carrying capacity, stakeholder management, and community involvement, but their value depends heavily on contextual and institutional conditions (Gajdošik, 2022; Mandić and Kennell, 2021).

The contemporary policy context reinforces the importance of this perspective. Tourism recovery and expansion have revived long-standing concerns about how destinations manage pressure on communities, infrastructure, labor markets, and the environment. OECD analyses emphasize that many governments are now seeking more balanced, sustainable, and inclusive tourism models, supported by more granular evidence and stronger governance capacity at destination level (OECD, 2024c). In this context, AI may offer significant advantages for forecasting, adaptive management, visitor-flow regulation, and evidence-based decision-making. Yet, without appropriate safeguards and institutional readiness, the same technologies may also reinforce opacity, deepen asymmetries in access to data and digital capabilities, and weaken public accountability.

For these reasons, this paper argues that AI should be conceptualized not only as a technological innovation in tourism, but as an emerging domain of tourism policy. Such a perspective shifts the analytical focus from adoption alone to governance: who controls tourism data, how algorithmic systems are selected and monitored, what forms of transparency and human oversight are required, and how AI can be aligned with broader public goals such as sustainability, inclusion, resilience, and public value. International AI governance frameworks already stress principles such as transparency, fairness, robustness, accountability, and human-centered oversight, and these principles are directly relevant to destination-level tourism governance (OECD, 2024b; UNESCO, 2022).

Accordingly, the purpose of this paper is to examine artificial intelligence as an emerging domain of tourism policy at the destination level. Rather than treating AI solely as a technological innovation or a business tool, the paper conceptualizes it as a governance issue that requires attention to public decision-making, institutional readiness, accountability, and inclusion. In doing so, the study seeks to contribute to the tourism policy literature by integrating insights from research on AI in tourism, destination governance, and public-sector AI governance into a unified conceptual framework.

The paper makes two main contributions. First, it provides a conceptual framework for assessing destination readiness for AI governance through four interrelated dimensions: data governance, accountability and transparency, institutional capacity, and inclusiveness. Second, it uses this framework to examine the principal governance opportunities and risks associated with AI in tourism destinations, showing that the value of AI depends not only on technological capability, but on the policy and institutional conditions under which it is governed.

The remainder of the paper is organized as follows. The next section reviews the literature on artificial intelligence in tourism, destination governance, and AI governance in the public sector. Section 3 develops the conceptual framework for AI governance in tourism destinations. Section 4 presents the core analytical discussion of the paper by examining the main governance opportunities and risks associated with AI in destination contexts. Finally, the paper concludes by summarizing the main arguments, highlighting policy implications, and identifying directions for future research.

2. LITERATURE REVIEW

2.1. Artificial Intelligence in Tourism

Artificial intelligence has become a prominent theme in tourism and hospitality research, especially as destinations and firms seek new ways to improve forecasting, personalization, service automation, and operational efficiency. Recent reviews show that the literature has expanded rapidly and now covers applications such as chatbots, recommendation systems, marketing analytics, service robots, intelligent automation, and generative AI. At the same time, this body of work remains unevenly distributed, with a stronger concentration on firm-level performance, customer

experience, and marketing outcomes than on governance and policy implications (Bulchand-Gidumal et al., 2024; Fernández et al., 2026; Law et al., 2024; Samala et al., 2025).

This emphasis has produced valuable insights into how AI may improve responsiveness and competitiveness across tourism services. For example, intelligent systems are frequently associated with more efficient customer interaction, better targeting, improved travel planning, and more flexible management of large information flows. Research on intelligent automation also suggests that AI-related tools may support sustainability-oriented functions such as visitor monitoring, quality-of-life analysis, heritage management, and environmental control. Even so, this literature also notes important blind spots, particularly the relative underdevelopment of research on environmental trade-offs, institutional capacity, and the broader societal consequences of automation in tourism systems (Bulchand-Gidumal et al., 2024; Fernández et al., 2026; Majid et al., 2023).

A related stream of scholarship has developed around smart destinations and digital transformation. Here, the central claim is that tourism destinations increasingly depend on integrated digital infrastructures, data-sharing systems, and intelligent forms of coordination. However, newer work in this area has also started to question overly technocratic views of smartness, arguing that tourism intelligence should not be reduced to technological deployment alone. Rather, it should be understood through stakeholder relations, territorial conditions, public value, and the capacity of destinations to translate digital tools into meaningful collective outcomes. This is especially relevant for AI, because algorithmic systems are embedded in institutional settings and do not operate independently from governance structures (Femenia-Serra and Ivars-Baidal, 2021; Fernández et al., 2025; Roxas et al., 2020).

2.2. Destination Governance and Tourism Policy

Tourism governance research provides an essential foundation for understanding why AI should be treated as more than a business innovation. Destinations are complex systems in which multiple public and private actors interact across policy domains such as mobility, environment, land use, infrastructure, culture, and economic development. Governance, in this context, concerns the arrangements through which these actors coordinate, negotiate priorities, distribute responsibilities, and establish legitimacy in destination development. Recent work has emphasized that effective governance is closely tied to stakeholder inclusion, sustainability, and the ability to balance market objectives with community interests (Bichler, 2021; Díaz et al., 2022; Roxas et al., 2020). This perspective is especially important because tourism governance is not only about formal institutions; it also involves participation, collaboration, and the relative influence of different stakeholders. Studies have shown that local residents are often underrepresented in governance arrangements even though their support is central to destination legitimacy and long-term sustainability. Likewise, stakeholder-mapping research has demonstrated that sustainable tourism governance depends on harmonizing the roles of governments, businesses, communities, and visitors rather than assuming that destinations can be steered effectively by a narrow managerial core alone (Bichler, 2021; Fernández et al., 2023; Roxas et al., 2020).

When AI enters this setting, the governance problem becomes more complex. AI systems can shape how destinations define problems, classify visitors, forecast flows, prioritize interventions, and evaluate performance. That means they may influence not only operational choices but also the underlying distribution of visibility, authority, and knowledge within tourism systems. From a governance standpoint, the key issue is not simply whether AI is efficient, but who controls it, how it is reviewed, whose interests it serves, and whether it strengthens or weakens participatory and sustainable destination management. This is precisely why tourism policy scholarship needs to engage AI more directly as a governance issue rather than leaving it primarily within the domains of marketing or service innovation (Bichler, 2021; Solares et al., 2025; Taeihagh, 2021).

The broader public governance literature helps clarify why AI in tourism raises issues that go well beyond technological capability. Recent studies on AI in government consistently emphasize that adoption is accompanied by tensions related to fairness, transparency, privacy, accountability, human rights, and public value creation. Rather than treating AI as a neutral tool, this literature frames it as a socio-technical system whose consequences depend on legal frameworks, administrative capacity, data infrastructures, and institutional oversight. These insights are directly relevant to tourism destinations, especially where public authorities or destination management organizations use AI-informed systems for planning, regulation, or public communication (Madan and Ashok, 2023; Solares et al., 2022; Zuiderwijk et al., 2021).

A central issue in this discussion is the governance of AI itself. AI governance scholarship argues that the challenge is not merely to regulate finished technologies, but to establish adaptive and hybrid forms of oversight capable of addressing evolving technical, legal, and societal risks. This includes questions of accountability, contestability, procurement, regulatory alignment, and institutional learning. In destination settings, these concerns are highly pertinent because tourism authorities may rely on third-party platforms, proprietary data, and outsourced analytics without always possessing the internal capacity to assess how algorithmic outputs are produced or what distributive effects they may generate (Taeihagh, 2021; Zuiderwijk et al., 2021). Another key issue is the use of algorithmic models in policymaking. Research in public policy has shown that algorithmic systems can support communication, simplification, and coordination, but only when handled with care and interpreted within broader organizational and political contexts. Otherwise, they may reproduce bias, marginalize certain groups, or narrow the range of policy options considered legitimate or feasible. For tourism destinations, this implies that AI-based tools for visitor management, segmentation, or destination promotion should not be evaluated only on predictive performance, but also on how they influence policy judgment, stakeholder participation, and the accountability of public decisions (Kolkman, 2020; Leyva et al., 2023; Madan and Ashok, 2023).

Taken together, these three streams of literature reveal an important gap. Tourism studies have generated growing knowledge about AI applications, customer experience, automation, and digital transformation. Governance research has clarified the centrality of stakeholder coordination, legitimacy, and sustainability in destination management. Public sector AI scholarship has identified the ethical, institutional, and regulatory tensions associated with algorithmic systems. Yet these literatures have only rarely been integrated into a unified framework for analyzing AI as a destination-level tourism policy issue (Law et al., 2024; Madan and Ashok, 2023; Solares et al., 2022; Taeihagh, 2021).

The main unresolved question is not whether AI can be useful in tourism, but under what policy conditions it can be governed responsibly and aligned with broader destination goals such as sustainability, inclusion, resilience, and public value. Existing tourism research still leans heavily toward adoption-centered approaches, whereas policy-oriented analysis requires greater attention to institutional preparedness, data governance, accountability mechanisms, and multi-stakeholder coordination. This paper addresses that gap by positioning AI at the intersection of tourism policy, destination governance, and digital public administration, and by treating destination readiness for AI governance as a central analytical concern (Bulchand-Gidumal et al., 2024; Navarro et al., 2023; Zuiderwijk et al., 2021).

3. CONCEPTUAL FRAMEWORK FOR AI GOVERNANCE IN TOURISM DESTINATIONS

The growing use of artificial intelligence in tourism requires an analytical perspective that moves beyond technological adoption and firm-level efficiency. As argued in the preceding sections, AI is increasingly relevant to destination management not only because of its operational capabilities, but because it affects how tourism systems are governed, how decisions are justified, and how benefits and risks are distributed across stakeholders. For this reason, the governance of AI in tourism destinations should be approached as a policy issue rather than as a purely technical matter. The purpose of this section is to develop a conceptual framework for assessing destination readiness to govern AI in a way that is consistent with public value, sustainability, inclusiveness, and institutional legitimacy. This framework is based on the intersection of three bodies of scholarship discussed in the literature review: research on AI in tourism, destination governance, and public-sector AI governance. From tourism studies, it takes the recognition that AI has become increasingly embedded in destination intelligence, tourism planning, and service ecosystems. From destination governance research, it draws the view that tourism destinations are multi-actor systems in which strategic coordination, stakeholder participation, and legitimacy are essential. From public governance scholarship, it incorporates the idea that AI systems must be evaluated not only by what they can do, but by the institutional, ethical, and regulatory conditions under which they operate. Taken together, these literatures suggest that destination readiness for AI governance depends on whether public authorities and related destination actors are capable of guiding AI adoption in ways that are transparent, accountable, coordinated, and socially inclusive (Díaz et al., 2023; Diaz et al., 2024; Kolkman, 2020; Madan and Ashok, 2023; Taeihagh, 2021; Zuiderwijk et al., 2021).

Accordingly, this paper defines AI governance in tourism destinations as the set of institutional arrangements, policy principles, regulatory mechanisms, administrative capacities, and stakeholder processes through which destination actors shape the design, adoption, oversight, and evaluation of AI-related systems in tourism. This definition emphasizes that governance is not limited to formal regulation. It also includes data-sharing rules, procurement practices, coordination structures, participatory mechanisms, ethical safeguards, and the ability to align AI deployment with broader destination objectives. Under this approach, the relevant question is not simply whether a destination uses AI, but whether it possesses the governance conditions necessary to ensure that AI contributes to sustainable and legitimate destination development.

To operationalize this argument conceptually, the framework proposed here is organized around four interrelated dimensions:

- Data governance
- Accountability and transparency
- Institutional capacity, and
- Inclusiveness.

These dimensions are not presented as isolated variables. Rather, they function as mutually reinforcing components of destination readiness for AI governance. A destination may possess access to large amounts of tourism data, for example, but still lack adequate accountability mechanisms. Likewise, it may invest in digital tools without ensuring that local stakeholders can participate in, understand, or benefit from their use. For this reason, the framework assumes that destination readiness depends on the interaction among all four dimensions rather than on progress in any single domain.

3.1. Data Governance

Data governance constitutes the first pillar of destination readiness for AI governance because AI systems depend fundamentally on the availability, quality, accessibility, and regulation of data. In tourism destinations, relevant data may come from a wide range of sources, including booking platforms, digital mobility systems, social media, online reviews, sensors, administrative records, geolocation tools, and destination management platforms. These data streams may improve forecasting, support visitor-flow monitoring, inform strategic planning, and strengthen policy responsiveness. However, the existence of data alone does not guarantee their effective or legitimate use. What matters is how data are governed.

In this framework, data governance refers to the rules, practices, and institutional arrangements that determine how tourism-related data are collected, shared, stored, accessed, protected, and used. This includes issues such as data ownership, interoperability, privacy protection, quality assurance, consent, security, and public-private data-sharing relationships. These issues are especially important in tourism because destinations often depend

on information generated or controlled by private platforms and technology firms. As a result, local authorities may have limited access to strategic data or may become dependent on actors whose priorities are not necessarily aligned with public interests.

From a governance standpoint, weak data governance creates several risks. First, fragmented or low-quality data may reduce the reliability of AI-supported decisions. Second, limited public control over key datasets may weaken the strategic autonomy of destination authorities. Third, poor privacy and consent practices may undermine public trust and expose destinations to legal or ethical problems. Fourth, lack of interoperability between systems may prevent public institutions from integrating data into coherent decision-making processes. Therefore, data governance is not simply a technical prerequisite for AI use; it is a core governance condition that shapes the legitimacy, effectiveness, and policy relevance of AI in tourism destinations. Conceptually, a destination shows stronger readiness in this dimension when it has clear norms and practices regarding data access, sharing, privacy, stewardship, and integration, and when public actors are able to negotiate data arrangements that support destination-wide intelligence without surrendering accountability or strategic control. In this sense, data governance provides the informational foundation upon which the other dimensions of AI governance depend.

3.2. Accountability and Transparency

The second dimension of the framework is accountability and transparency. This dimension addresses the extent to which AI-supported processes in tourism destinations can be understood, monitored, explained, and contested by relevant actors. In public governance contexts, accountability is essential because decisions influenced by AI may affect resource allocation, destination promotion, mobility management, public communication, and the visibility of places or businesses within tourism systems. If such systems operate opaquely, public institutions may lose the ability to justify their decisions and stakeholders may be unable to identify who is responsible for errors, bias, or harm. Transparency in this context refers to the degree to which the functioning, purpose, limitations, and implications of AI systems are visible or explainable to decision-makers and affected stakeholders. Accountability refers to the capacity to assign responsibility, ensure oversight, correct mistakes, and create mechanisms through which decisions can be reviewed or challenged. While these concepts are distinct, they are closely linked. Transparency is often a precondition for accountability, since it is difficult to hold actors responsible for outcomes that cannot be understood or examined.

A destination demonstrates greater readiness in this dimension when AI-related decisions are subject to meaningful human oversight, when the purposes and limitations of systems are clearly communicated, when monitoring and auditing mechanisms exist, and when responsibility for decisions remains identifiable rather than diffused across technical systems and external providers. This also implies that AI should support, rather than replace, policy judgment. In destination governance, legitimacy depends not only on efficiency, but on the capacity to explain why decisions are made and to ensure that they remain open to scrutiny by stakeholders.

3.3. Institutional Capacity

The third dimension is institutional capacity. Even when destinations possess relevant data and aspire to responsible AI use, effective governance cannot occur without administrative, technical, and organizational capacity. Institutional capacity refers to the ability of destination authorities and related governance bodies to understand, manage, regulate, and evaluate AI-related systems within tourism policy and destination management. This includes legal knowledge, technical literacy, procurement capability, coordination mechanisms, policy design competence, monitoring routines, and the ability to translate technological possibilities into public value.

This dimension is critical because AI adoption is often discussed as if access to tools were sufficient in itself. In practice, however, destinations vary widely in their digital maturity, organizational structure, financial resources, and technical expertise. Some may be able to experiment with advanced analytics and integrated intelligence systems, while others may lack even basic data infrastructure or staff capable of evaluating vendor claims and system outputs. If AI tools are introduced without sufficient institutional capacity, destinations may become dependent on external actors, fail to identify risks, or adopt technologies that are poorly matched to local policy needs.

Institutional capacity also has a coordination component. Tourism governance is inherently cross-sectoral, and AI-related decisions may involve tourism departments, digital transformation units, data protection authorities, local governments, mobility agencies, environmental offices, and destination management organizations. For this reason, readiness depends not only on the strength of individual institutions, but on the capacity to coordinate across policy domains and stakeholder groups. Fragmented institutional arrangements may reduce the effectiveness of AI governance even where technical tools are available.

Within this framework, a destination exhibits stronger readiness when it has the administrative competence to evaluate AI systems, the legal and ethical awareness to govern them responsibly, the organizational routines needed for oversight, and the capacity to coordinate among actors involved in tourism and digital governance. Institutional capacity therefore acts as the enabling condition that allows data governance and accountability mechanisms to be translated into practice. Without it, formal principles are unlikely to produce effective governance outcomes.

3.4. Inclusiveness

The fourth dimension is inclusiveness. This dimension addresses the extent to which AI governance in tourism destinations supports equitable participation, avoids reinforcing exclusion, and aligns technological change with the interests of a broad range of stakeholders. Tourism destinations are socially heterogeneous spaces in which benefits and burdens are distributed unevenly. If AI is adopted primarily in ways that favor large firms, digitally sophisticated intermediaries, or already dominant market actors, it may intensify existing asymmetries rather than contribute to inclusive destination development.

Inclusiveness has both distributive and participatory aspects. On the distributive side, it concerns whether access to AI-related benefits, data capabilities, and digital opportunities is shared across different types of actors, including small and medium-sized enterprises, community-based initiatives, workers, and local residents. On the participatory side, it concerns whether stakeholders have meaningful opportunities to understand, discuss, and influence how AI is used in destination governance. These two aspects are closely related because participation helps shape how benefits and risks are recognized, negotiated, and managed.

This dimension is especially important in tourism because many destinations contain actors with very different levels of digital capability. Large platforms, international hotel groups, and specialized technology vendors may possess advanced data resources and analytical tools, while local businesses and communities may have limited capacity to engage with digital transformation processes. Without explicit governance measures, AI can therefore exacerbate digital divides, reinforce market concentration, and make destination management less representative of local interests. In addition, algorithmic systems may reproduce bias or systematically disadvantage certain groups if they are trained on incomplete, skewed, or commercially oriented datasets.

A destination demonstrates stronger readiness in this dimension when its approach to AI governance includes mechanisms to reduce digital exclusion, support capacity-building among local actors, incorporate stakeholder voices into governance processes, and evaluate AI not only in terms of efficiency but also in terms of fairness and shared benefit. Inclusiveness matters because destination legitimacy depends on more than visitor satisfaction or operational optimization. It depends on whether tourism development remains socially acceptable and publicly accountable in the eyes of those who live and work in the destination.

3.5. Interaction among the Four Dimensions

Although the four dimensions can be analytically distinguished, their value lies in their interaction. Data governance without accountability may enable technically sophisticated but opaque decision-making. Accountability without institutional capacity may produce formal oversight requirements that cannot be implemented effectively. Institutional capacity without inclusiveness may strengthen administrative control while ignoring distributional consequences and stakeholder legitimacy. Inclusiveness without adequate data governance may generate participatory aspirations that cannot be supported by reliable or ethically governed information systems. For this reason, the framework treats destination readiness for AI governance as a relational and multidimensional condition. Strong readiness exists when destinations are able to combine robust data practices, transparent and accountable oversight, capable institutions, and inclusive governance processes. Weakness in any one dimension may compromise the integrity of the whole system. This means that AI governance should not be understood as a checklist of isolated technical requirements, but as an institutional configuration through which destinations seek to align digital transformation with broader public objectives.

The interaction among these dimensions also helps explain why AI governance should be treated as a destination-level policy issue rather than as a purely managerial concern. Tourism destinations must balance competitiveness with sustainability, innovation with legitimacy, and efficiency with public value. AI intensifies these tensions because it offers powerful tools for prediction and coordination while also raising questions about power, visibility, exclusion, and control. The framework proposed here captures these tensions by showing that the policy challenge lies not simply in adopting AI, but in governing it under conditions that preserve public accountability and shared benefit.

3.6. Our Proposal for a Conceptual Proposition

Based on the framework developed above, this paper advances the following conceptual proposition:

> *Destination readiness for AI governance depends on the extent to which destination actors can establish coherent data governance arrangements, ensure accountability and transparency in AI-supported decisions, build institutional capacity for oversight and coordination, and promote inclusive participation and benefit distribution across stakeholders.*

This proposition shifts attention away from the mere presence of AI tools and toward the governance conditions that shape their legitimacy and usefulness. It suggests that destinations should not be classified as advanced merely because they use intelligent systems, but because they possess the institutional and policy capacity to govern those systems responsibly. In this sense, the framework offers a basis for evaluating AI in tourism destinations through a governance lens that integrates technological, administrative, ethical, and social considerations.

The function of this framework is not to test causal relationships empirically, but to organize the analysis of AI as a tourism policy issue and provide a structured basis for discussion. The four dimensions developed here serve as the central analytical lens for the remainder of the article. In the following sections, they can be used to examine the governance opportunities that AI creates for tourism destinations, the risks and trade-offs that accompany those opportunities, and the policy implications for destination governments and management organizations seeking to adopt AI in a responsible and publicly legitimate manner. This framework therefore contributes to the paper in three ways. First, it provides conceptual clarity by defining AI governance in tourism destinations as a multidimensional policy construct. Second, it integrates previously fragmented literatures into a coherent analytical model. Third, it creates a practical basis for future empirical research, including comparative destination studies, governance-readiness assessments, and the development of qualitative or quantitative indicators for evaluating responsible AI adoption in tourism contexts.

4. GOVERNANCE OPPORTUNITIES AND RISKS OF ARTIFICIAL INTELLIGENCE IN TOURISM DESTINATIONS

The contribution of this work lies in using the framework developed in Section 3 as an analytical lens through which to

examine the policy relevance of artificial intelligence in tourism destinations. More specifically, the discussion that follows is organized around the four dimensions of destination readiness for AI governance identified earlier:

- Data governance
- Accountability and transparency
- Institutional capacity, and
- Inclusiveness.

Through these dimensions, the section assesses the principal opportunities that AI may offer for destination governance, while also identifying the main risks and trade-offs that public authorities must address if AI is to contribute to sustainable, legitimate, and inclusive tourism development.

The central argument of this section is that AI should not be evaluated solely in terms of technological sophistication or operational efficiency. Its significance for tourism policy lies in the fact that it can reshape how destinations generate knowledge, coordinate actors, allocate attention, respond to risks, and define what counts as effective destination management. In this sense, AI has the potential to strengthen destination governance, but it can also intensify existing institutional weaknesses, social asymmetries, and accountability deficits if adopted without an adequate governance framework (OECD, 2024a; Taeihagh, 2021; Zuiderwijk et al., 2021).

4.1. AI as an Opportunity for more Intelligent and Adaptive Destination Governance

One of the most important opportunities associated with AI in tourism destinations is its capacity to support more intelligent and adaptive forms of governance. Tourism destinations operate in highly dynamic environments shaped by fluctuating visitor demand, seasonal pressures, environmental vulnerability, mobility constraints, labor shortages, platform intermediation, and changing resident expectations. Under such conditions, destination authorities often face the challenge of making decisions in contexts characterized by uncertainty, fragmented information, and delayed institutional response. AI may help reduce some of these limitations by improving predictive capacity, accelerating information processing, and enabling more responsive forms of destination management. At the destination level, AI can support public decision-making in multiple ways. Predictive models may enhance demand forecasting and help authorities anticipate congestion, infrastructure stress, or labor needs. Real-time analytics may improve visitor-flow management, especially in locations facing overcrowding or environmental pressure. Automated data processing may strengthen destination intelligence by integrating diverse information sources, including mobility data, online reviews, booking trends, event calendars, and environmental indicators. AI may also assist in targeting public communication, improving emergency response, and identifying patterns that would be difficult to detect through conventional administrative tools (Cerdá-Mansilla et al., 2024; OECD, 2024c; Wong et al., 2023).

From a governance perspective, the value of these capabilities lies not simply in efficiency gains, but in the possibility of improving the quality of public decision-making. A destination that can identify visitor surges earlier, monitor the use of fragile spaces more effectively, or detect changes in resident sentiment more quickly may be better positioned to manage tourism in ways that are both more strategic and more preventive. In this sense, AI can contribute to a shift from reactive governance toward anticipatory governance. Such a shift is especially relevant in destinations seeking to balance competitiveness with sustainability, as it may allow public authorities to intervene earlier and with greater precision when tourism growth begins to create social or environmental pressure. However, this opportunity should not be overstated. AI-supported adaptation does not automatically translate into good governance. Predictive capacity is only useful when institutions are able to interpret outputs correctly, integrate them into legitimate decision processes, and act on them in ways that remain consistent with public values. For this reason, the opportunity of smarter destination governance is inseparable from the risks associated with overreliance on technical systems, weak oversight, and limited institutional preparedness. AI can improve destination intelligence, but it cannot substitute for governance judgment.

4.2. Data Governance: Strategic Intelligence or Strategic Dependence?

The first major governance dimension through which the opportunities and risks of AI must be assessed is data governance. The growing relevance of AI in tourism is inseparable from the growing centrality of data. Destinations increasingly rely on data from digital platforms, reservation systems, mobile devices, transport networks, sensors, review sites, and social media. When governed effectively, these data can substantially improve destination intelligence. AI can process large and heterogeneous data streams to generate timely insights about visitor movement, market trends, sentiment, service quality, and spatial concentration. This creates a major opportunity for public authorities to strengthen evidence-based tourism policy and to move beyond static or fragmented planning approaches (Femenia-Serra and Ivars-Baidal, 2021; OECD, 2024b).

In principle, better data governance can allow destinations to make better policy choices. A destination with access to interoperable, reliable, and well-regulated tourism data may be able to design more precise public interventions, identify emerging pressures, evaluate policy outcomes more effectively, and coordinate more successfully with public and private stakeholders. This is particularly important in contemporary tourism governance, where destination challenges often emerge quickly and require timely information. AI can amplify the value of data by transforming raw information into actionable intelligence, but only when the underlying governance arrangements are robust. At the same time, the reliance of AI on data creates serious governance risks. One of the most important is strategic dependence on private actors. Much of the most valuable tourism data is generated or controlled by digital platforms, travel intermediaries, payment systems, telecommunications firms, and technology vendors rather than by public authorities. As a result, destinations may face asymmetric data relationships in which they depend on actors whose commercial priorities do not necessarily coincide with

public objectives. In such cases, AI may deepen rather than reduce governance vulnerability by making destinations more reliant on external infrastructures of data production and analysis (OECD, 2024b; Zuiderwijk et al., 2021)

Another risk concerns data quality and representativeness. Tourism-related datasets are not neutral reflections of reality. They may overrepresent digitally visible visitors, formal market transactions, or platform-mediated behavior, while underrepresenting local practices, informal activity, community concerns, and less digitized actors. If AI systems are trained on incomplete or skewed data, the resulting outputs may privilege certain forms of tourism activity and marginalize others. In destination governance, this can distort planning priorities and reinforce biases in policy attention.

Data governance also involves privacy, consent, security, and interoperability. When destinations use AI to process behavioral, geolocation, or consumer data, they face not only technical challenges but also legal and ethical obligations. Weak governance in these areas may erode public trust and generate conflict over surveillance, misuse of personal information, or opaque data-sharing arrangements. Thus, the key policy issue is not simply whether data are available, but whether they are governed in ways that are transparent, legitimate, and oriented toward public value. Conceptually, then, data governance presents a dual possibility. It can increase the strategic intelligence of destination authorities, but it can also create new forms of strategic dependence and legitimacy risk. The policy challenge is to ensure that the data infrastructures underpinning AI remain compatible with public oversight, ethical safeguards, and destination-wide governance objectives.

4.3. Accountability and Transparency: Enhanced Decision Support or Opaque Automation?

The second major governance dimension is accountability and transparency. A central promise of AI in tourism is that it can improve decision support by rapidly analyzing complex patterns and generating more refined recommendations than traditional administrative tools. In destination contexts, this may help public authorities prioritize interventions, optimize communication strategies, anticipate demand, and allocate resources more effectively. If designed and governed properly, AI can therefore support more informed and better-coordinated public action.

The features that make AI attractive (speed, complexity, automation, and predictive power) also create one of its greatest risks: opacity. Many AI systems are difficult to interpret, especially when acquired through external vendors or embedded in proprietary platforms. Public authorities may use outputs without fully understanding how they were generated, what assumptions shaped them, or what kinds of bias they contain. This is a serious problem in destination governance because tourism decisions often have distributive effects, affect different stakeholder groups unevenly, and require public justification (Kolkman, 2020; Madan and Ashok, 2023). In policy terms, accountability requires more than technical functionality. It requires that decisions influenced by AI remain understandable, reviewable, and attributable to responsible actors. If a destination uses AI-supported tools to prioritize public investment, regulate visitor flows, promote particular zones, or shape destination branding, stakeholders must be able to understand the rationale behind those decisions. Where that is not possible, public legitimacy may weaken, especially if communities perceive that important choices are increasingly shaped by systems they cannot scrutinize.

Transparency is closely linked to this issue, but it should not be understood narrowly as disclosure of technical code alone. In governance contexts, meaningful transparency includes clarity about what AI systems are used for, what types of data they rely on, what their limitations are, what role human actors retain, and how outputs are reviewed before becoming part of policy action. In tourism destinations, transparency also has a relational dimension: it influences whether businesses, residents, and other stakeholders perceive AI as a legitimate support tool or as an opaque mechanism that shifts power away from publicly accountable institutions. The risk, therefore, is that AI may produce a form of opaque automation in which decision support gradually becomes decision displacement. This can occur when public institutions defer too heavily to technical outputs, when vendor systems become black boxes, or when the authority to question algorithmic recommendations becomes weak in practice. Such outcomes are especially problematic in tourism policy because destinations are socially sensitive spaces where legitimacy depends not only on results but also on the perceived fairness and explainability of governance decisions. For this reason, the governance opportunity here is conditional. AI can enhance public decision support, but only if institutions preserve human oversight, develop auditing and review mechanisms, and ensure that responsibility for decisions remains clearly identifiable. In other words, the policy goal should not be automation for its own sake, but accountable augmentation of governance capacity.

4.4. Institutional Capacity: Governance Enhancement or Institutional Overstretch?

The third dimension is institutional capacity, and it is arguably the most decisive one in determining whether AI becomes a governance asset or a governance liability. AI may offer destinations new tools, but such tools do not generate public value in the absence of institutions capable of selecting them, interpreting them, monitoring them, and aligning them with public objectives. The governance question is therefore not only whether AI exists, but whether destination institutions are prepared to govern it.

A major opportunity associated with AI is that it may strengthen institutional performance in destination management. Public authorities and destination management organizations can potentially use AI to improve policy coordination, monitor conditions more effectively, reduce information overload, and support cross-sector planning. In destinations where tourism governance is already relatively organized, AI may reinforce strategic planning and improve the capacity to respond to complex and rapidly changing challenges. This is particularly important in contexts where tourism interacts strongly with environment, transport, urban management, public safety, and local economic development.

However, these potential gains presuppose a substantial level of institutional preparedness. AI governance requires technical literacy, legal awareness, procurement competence, ethical sensitivity, and the ability to coordinate across agencies and stakeholders. Many destinations may lack these capabilities, particularly where tourism governance is fragmented or under-resourced. In such contexts, the introduction of AI may create institutional overstretch rather than governance improvement. Authorities may adopt AI tools they cannot properly assess, rely on vendors they cannot effectively supervise, or generate outputs they cannot translate into coherent policy action (Madan and Ashok, 2023; Taeihagh, 2021). Institutional overstretch is especially likely when AI is introduced as part of modernization narratives without corresponding investments in skills, organizational routines, and inter-agency coordination. A destination may present itself as digitally advanced while lacking the internal structures required for data stewardship, auditing, ethical review, or stakeholder communication. In that scenario, AI risks becoming symbolic rather than substantively useful, or worse, becoming a source of dependency and governance fragmentation.

Another issue concerns cross-sector coordination. Tourism governance is rarely contained within a single administrative body. AI-related decisions may involve tourism departments, digital transformation offices, local governments, transport authorities, environmental agencies, and external partners. This means that institutional capacity must be understood not merely as the strength of one organization, but as the ability of the destination governance system as a whole to coordinate around shared principles and responsibilities. Without such coordination, AI may intensify fragmentation by introducing new technical layers into already complex governance environments.

Thus, institutional capacity represents both a prerequisite and a site of risk. AI can enhance destination governance only where institutions have the competence and coordination needed to embed it within legitimate public decision-making. Otherwise, the technology may outpace governance capacity and produce weak, inconsistent, or poorly supervised policy outcomes.

4.5. Inclusiveness: Shared Benefit or Deepened Digital Inequality?

The fourth dimension is inclusiveness, and it is central to evaluating AI from a tourism policy perspective. Tourism destinations are composed of actors with unequal access to information, capital, digital infrastructure, and political influence. In many destinations, large hotel chains, digital platforms, and specialized service providers possess far greater technological capability than small businesses, community-based initiatives, workers, or local residents. Under these conditions, the diffusion of AI can either support more inclusive destination development or intensify existing asymmetries.

One of the opportunities associated with AI is that it may broaden access to intelligence and coordination tools that were previously beyond the reach of some actors. For example, AI-supported analytics may help destination organizations understand visitor behavior more clearly, identify underserved market segments, or improve service integration. In principle, such tools could support smaller actors if destination-level governance mechanisms ensure access, training, and fair participation. AI may also help governments detect unequal patterns of tourism pressure, identify underserved communities, or design more targeted interventions in support of local inclusion. Yet the risks are substantial. Without explicit governance measures, AI may deepen digital inequality in at least three ways. First, it may reinforce the advantage of actors that already control valuable data and analytical infrastructure. Second, it may exclude smaller or less digitized stakeholders from the design and benefits of tourism intelligence systems. Third, it may reproduce social and territorial biases if algorithmic systems are trained on data that reflect existing inequalities or narrow commercial priorities (Bichler, 2021; Bulchand-Gidumal et al., 2024).

Inclusiveness is not only about access to benefits but also about access to voice. A destination may deploy technically advanced AI systems while failing to involve residents, local firms, or community actors in discussions about how such systems should be used. In such cases, AI governance may become technocratic, concentrating interpretive and decision-making power among experts, vendors, or administrative elites. This would run counter to contemporary understandings of destination governance, which emphasize participation, legitimacy, and the need to balance multiple interests in tourism development (Bichler, 2021; Roxas et al., 2020). Another important issue is fairness in representation. AI systems often depend on data traces that privilege some groups over others. Visitors who book through digital platforms, leave online reviews, or use mobile applications may become far more visible to tourism intelligence systems than residents, informal workers, or locally embedded businesses. As a result, what counts as a relevant destination problem may increasingly reflect the behavior of digitally legible actors, leaving less visible groups underrepresented in the policy process. This is one of the most important conceptual reasons why inclusiveness must be treated as a core dimension of AI governance rather than as a secondary concern. The policy implication is clear: if AI is to contribute to inclusive tourism development, destinations must complement technological adoption with stakeholder participation, digital capacity-building, attention to bias, and explicit concern for the distribution of benefits. In the absence of such measures, AI may improve destination intelligence while simultaneously making destination governance less equitable.

4.6. The Central Trade-off: Efficiency Versus Public Value

Taken together, the four dimensions reveal a deeper tension at the heart of AI governance in tourism destinations: the tension between efficiency and public value. AI is often promoted on the basis of its ability to optimize, automate, predict, and personalize. These are valuable capabilities, especially in destinations confronting complexity, volatility, and pressure to modernize. However, tourism policy cannot be reduced to optimization alone. Destinations are not merely service systems; they are social, economic, political, and territorial spaces in which tourism produces contested outcomes. For this reason, the key policy question is not whether AI makes tourism management more efficient, but whether it

helps destinations pursue publicly legitimate goals in ways that remain accountable, inclusive, and strategically autonomous. Efficiency gains that weaken transparency, increase dependency on private infrastructures, exclude small actors, or erode resident trust may ultimately undermine destination governance rather than strengthen it. Conversely, a governance approach that treats AI as a tool to support sustainability, participation, and informed public decision-making is more likely to generate long-term public value (OECD, 2024a; UNESCO, 2022). This trade-off is especially important in tourism because destinations are often under pressure to show visible performance improvements. Under such pressure, AI may be adopted for symbolic reasons or short-term gains, while deeper governance implications remain insufficiently examined. Conceptually, this paper argues that such an approach is inadequate. AI should be judged not only by what it delivers technically, but by how it reconfigures the relationship between knowledge, power, and legitimacy in destination governance.

The analysis developed in this section suggests that responsible AI governance in tourism destinations requires more than technological enthusiasm or innovation-oriented discourse. It requires institutional arrangements capable of ensuring that AI is aligned with destination-wide public objectives. From the perspective of the framework proposed in this paper, this means that destinations should seek to strengthen four governance conditions simultaneously. First, they need data governance arrangements that protect privacy, improve interoperability, reduce dependency on opaque private data structures, and support legitimate access to tourism intelligence. Second, they need accountability and transparency mechanisms that preserve human oversight, enable review and explanation, and prevent decision displacement by opaque systems. Third, they need institutional capacity in the form of technical literacy, coordination ability, procurement competence, and ethical awareness. Fourth, they need inclusive governance processes that address digital divides, broaden stakeholder participation, and evaluate AI in terms of fairness and shared benefit as well as operational performance.

These conditions should not be understood as optional additions to AI adoption. They are the governance foundations that determine whether AI becomes a tool of destination improvement or a source of new policy problems. In this sense, the opportunities and risks of AI are inseparable. The same technologies that may strengthen destination intelligence can also weaken autonomy. The same systems that may improve coordination can also obscure responsibility. The same innovations that may support strategic planning can also deepen exclusion. This is why AI in tourism must be treated fundamentally as a governance and policy issue.

The broader implication is that destinations should not be classified as advanced merely because they deploy AI tools. Rather, they should be considered governance-ready when they possess the institutional and policy conditions necessary to use AI in ways that remain transparent, accountable, inclusive, and oriented toward public value. This reframing is the principal contribution of the paper: it shifts the discussion from AI adoption in tourism to AI governance in tourism destinations.

5. CONCLUSIONS

This paper has argued that artificial intelligence should be understood not only as a technological development in tourism, but as an emerging domain of tourism policy at the destination level. Although AI is often discussed in terms of efficiency, personalization, automation, and innovation, its relevance for tourism destinations extends far beyond operational improvement. AI increasingly affects how destinations generate knowledge, coordinate action, define priorities, allocate attention, and justify public decisions. For that reason, its adoption cannot be assessed adequately through a purely technical or market-oriented lens. It must also be evaluated in terms of governance readiness, institutional legitimacy, and public value.

To address this issue, the paper developed a conceptual framework for AI governance in tourism destinations structured around four interrelated dimensions: data governance, accountability and transparency, institutional capacity, and inclusiveness. These dimensions were proposed as the main conditions through which destination readiness for AI governance can be understood. Rather than assuming that the presence of digital tools signals destination advancement, the framework suggests that governance quality is the more meaningful criterion. A destination may adopt sophisticated AI applications and still remain poorly prepared to govern them if it lacks clear data arrangements, effective oversight, administrative competence, or inclusive stakeholder processes. Using this framework, the paper examined the principal governance opportunities and risks associated with AI in tourism destinations. On the one hand, AI may strengthen destination intelligence, improve forecasting, support more adaptive public action, and enhance coordination across complex tourism systems. These capabilities are particularly relevant in a context where destinations face increasing pressure to balance competitiveness with sustainability, respond to rapid changes in visitor flows, and manage the social and environmental impacts of tourism development. On the other hand, the paper showed that these opportunities are inseparable from important governance risks. AI may increase strategic dependence on private data infrastructures, introduce opaque decision-making processes, overextend institutions with limited technical and regulatory capacity, and deepen digital inequality across stakeholders.

The central conclusion of the paper is therefore that the value of AI in tourism destinations depends less on technological capability itself than on the governance conditions under which that capability is embedded. AI can support better tourism policy only when destinations are able to govern data responsibly, preserve accountability and transparency, build institutional capacity for oversight and coordination, and ensure that the benefits and burdens of digital transformation are distributed more equitably. In this sense, the key challenge is not simply AI adoption, but responsible AI governance. This conclusion carries an important implication for destination governments and destination management organizations. The policy question should not be whether AI ought to be introduced as quickly as possible, but how it can be aligned with broader public objectives such as sustainability, legitimacy, resilience, and inclusion. Destinations that pursue AI primarily

as a symbol of modernization or competitiveness may overlook the governance safeguards needed to ensure that technological innovation remains publicly accountable. By contrast, destinations that approach AI as a governance issue are more likely to integrate it into tourism management in ways that support long-term public value rather than short-term technical optimization alone. As a conceptual paper, this study also has limitations. It does not empirically test the relationships proposed in the framework, nor does it examine how the four dimensions may vary across different institutional, territorial, or regulatory contexts. In addition, because AI technologies and governance debates are evolving rapidly, some of the specific issues associated with AI in tourism may continue to change over time. Nevertheless, these limitations do not diminish the relevance of the paper's contribution. On the contrary, they reinforce the need for conceptual clarity in a field where technological change is advancing more quickly than governance analysis.

Future research can build on this framework in several ways. Comparative studies may examine how destinations with different governance structures and digital capacities vary in their readiness to govern AI. Empirical work may also operationalize the four dimensions proposed here into indicators, assessment tools, or case-based evaluation criteria. Further research could explore how residents, small businesses, workers, and destination organizations perceive the legitimacy of AI-supported governance, as well as how public-private data relationships influence the autonomy of destination policy. Such studies would help move the field from conceptual clarification toward empirical validation and practical application.

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