

Stakeholder perspectives on the adequacy of sustainable tourism policy in Zambia: The case of the Kafue River catchment

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ABSTRACT

This study examines the strategies for achieving sustainable tourism in biodiversity-rich regions, using Zambia's Kafue River Catchment as a case study. It specifically analyses the adequacy (and/or inadequacy) of Zambia's current tourism policy to promote sustainable tourism from stakeholder perspectives and lived experiences. The Sustainability Theory guides its analysis. It utilises the qualitative case study design, which allows the use of in-depth interviews and focus group discussions to collect data. Thus, 21 community members (3 businesses, 16 households, and 2 customary chiefs) and three (3) key informants (1 association and 2 policymakers) were purposively selected for in-depth interviews from the population of about 200 households, five customary chiefs, and 12 businesses in the Lower Kafue River Catchment. The data analysis followed the qualitative thematic analysis approach. Its findings demonstrate that Zambia's current tourism policy is inefficient in three critical aspects: content, implementation and justice. Based on this, the study concludes that there is an urgent need to revisit Zambia's tourism policy to address the identified gaps and promote sustainable tourism both in the Kafue River Catchment and the country as a whole. In doing so, the study contributes to the current debates on sustainable tourism, reframing tourism policy as a co-created framework rather than a directive, which shifts policy from being compliance-orientated and externally imposed to being participatory, adaptive, and community-driven. As such, the study recommends the following as intervention measures: localised communication strategies, participatory governance platforms, continuous capacity building, and participatory policy implementation and monitoring mechanisms.

Keywords: Community-Based Tourism, Governance Gaps, Kafue River Catchment, Policy Adequacy, Policy Awareness, Sustainable Tourism, Stakeholder Perspectives

I. INTRODUCTION

This article analyses the current policy provisions and their adequacy (and/or inadequacy) in facilitating sustainable tourism in Zambia, particularly in the Kafue River Catchment. Sustainable tourism has become an essential strategy for balancing aspirations for ecological conservation and socio-economic benefits, especially for communities in biodiversity-rich areas in developing countries. The Kafue River Catchment is one such area encompassing the expansive Kafue National Park and other biodiversity hotspots in Zambia. Although the Kafue River Catchment holds immense potential for tourism, conservation financing, and inclusive growth, the challenge has always been about striking the delicate balance between biodiversity conservation and tourism as an economic activity. We argue in this paper that sustainable tourism (also referred to as eco-tourism) has the potential to simultaneously promote biodiversity conservation on the one hand and the economic welfare of local communities on the other hand in an equitable manner.

Globally, tourism contributes approximately 10% to the Gross Domestic Product [GDP] and supports millions of jobs. Yet, its conventional form and practices cause environmental degradation, biodiversity loss, and erosion of cultural identity in destination areas (United Nations World Tourism Organization [UNWTO], 2023). This is partly because it treats biodiversity as a mere resource in the tourism process to be consumed for achieving economic benefits for a small section of society. This notion is now being challenged by a growing need for an innovative tourism policy that guides tourism development, environmental stewardship, and stakeholder engagement (Magnusson et al., 2024). In November 2024, during the COP29 meeting in Marrakesh, Morocco, more than 50 countries signed the UN Sustainable Tourism Declaration (United Nations Framework Convention on Climate Change [UNFCCC], 2024). This remains the

most assertive step by the international community towards the realisation of sustainable tourism that embraces eco-friendly practices, promotes community involvement, and ensures equitable distribution of costs and benefits.

Global renowned tourist destinations, such as Costa Rica and the Galápagos Islands in the Americas, which have already adopted sustainable tourism practices are now serving as models for others on how tourism can align with conservation and local development efforts (McClanahan, 2024). Africa, on the other hand, lags, as it remains tied to conventional tourism practices that harm the environment (Akpa et al., 2025). This is despite its potential for sustainable tourism, including rich biodiversity, cultural heritage, and untapped natural resources. Zambia, in particular, stands out due to its abundant wildlife and ecological diversity, presenting an opportunity for the country to leverage sustainable tourism for economic development while enhancing its environmental management safeguards (UNWTO, 2023).

A few other African countries have embraced sustainable tourism practices, creating opportunities for income diversification, employment, and small enterprise development. As a result, community conservancies in Namibia, for example, have been rolled out and have since begun to generate household income and reduce rural vulnerability (Jones, 2007; Snyman, 2014). South Africa, another country implementing sustainable tourism policies, has also developed pro-poor tourism policies, which have encouraged local procurement and enterprise development; however, leakages remain a challenge (Spenceley, 2008; Rogerson, 2006). These and a few other countries on the continent have made local communities the centre of their tourism policies and implementation, as they fear that without doing so, the sector is prone to elites capturing the revenues, exposing the locals to heightened poverty and inequalities (Ashley & Roe, 2002).

Given that tourism occurs in a natural environment, there is a need for strong policies to ensure conservation incentives to reduce illegal resource exploitation, such as poaching. These measures could improve habitat protection and conservation, as seen in Namibia and Rwanda (Jones, 2007; Spenceley, 2008). Yet, poor cross-sector coordination can easily shift pressures to areas outside the protected areas. This in turn may undermine ecological balance and put the future of protected areas in serious jeopardy (Honey, 2008; Gössling, 2002). This suggests that adaptive management, including monitoring and integration of local knowledge, is essential for long-term biodiversity sustainability (Saarinen, 2010; Coad et al., 2015). Particularly, policies that recognise cultural heritage and empower communities can enhance social cohesion and identity in tourism (Scheyvens, 1999; Rogerson, 2006). But exclusion of women and youth can create tensions (Ashley & Roe, 2002; Stone & Nyaupane, 2016). This means that community involvement in policy formulation and implementation can foster local ownership and trust of tourism projects, which ultimately can enhance local participation in biodiversity conservation (Manyara & Jones, 2007; Saarinen, 2010).

Finally, fostering sustainable tourism policy requires robust, effective, and predictable property rights in place. Most importantly, tenure of investment in tourism facilities and management must be clear and predictable (Jones, 2007; Coad et al., 2015). Transparency in the allocation of generated revenues and costs can promote accountability and inclusiveness (Spenceley, 2008; Snyman, 2014). In fact, policy weaknesses breed corruption and inequality, which negatively impact the sector and marginalise local communities (Ashley & Roe, 2002). Thus, both the content and the implementation process of tourism policies matter for sustainable tourism to thrive. The tourism policy must also be aligned with relevant national policies, including land tenure and property rights, for better outcomes (Snyman, 2014). This clearly shows that policy and its implementation are the main drivers of sustainable tourism in destination areas.

1.1 Statement of the Problem

Ideally, tourism policies and community dynamics should align to ensure equitable distributions of benefits and costs, as well as biodiversity management. In emerging tourist destinations, therefore, the integration of effective policies, active community participation, and equitable resource distribution can promote both ecological sustainability and the growth of the sector itself (UNWTO, 2023). This means that a legal framework is a core determinant of tourism outcomes; if it is weak or poorly implemented, no sustainable tourism practices can be achieved (Aguinis et al., 2023).

Despite its rich biodiversity and cultural significance, and being one of Zambia's main tourist destinations, the Kafue River Catchment faces several challenges. Key issues include environmental degradation caused by natural occurrences, such as climate change, and anthropogenic activities, including deforestation and poaching, as well as poor policy implementation and minimal community involvement in decision-making processes. Most of these challenges have been attributed to policy failures, which often prioritise short-term revenue generation, neglecting long-term sustainability and the equitable distribution of benefits to local communities (WWF Zambia, 2022). As such, until 2025, Zambia pursued tourism that places insufficient premium on the enforcement of environmental policies, which threatens the region's ecological balance and the potential for sustainable tourism (Chanda et al., 2021).

The National Tourism Policy of 2015 and the Tourism and Hospitality Act No. 13 of 2015 constitute Zambia's main tourism legal framework. Coupled with the launch of the *Kafue National Park General Management Plan 2025–2035* in 2025, this framework presents a significant milestone in aligning Zambia's conservation goals with tourism strategies, fostering inclusive governance and community participation in tourism and biodiversity management (Ministry of Tourism, 2025). Despite this, stakeholders, including local communities, private operators, and conservationists, still fear that the new policy lacks coherence, enforcement mechanisms, and responsiveness to local realities. So far, no empirical studies have been conducted to understand and analyse these fears.

More broadly, existing studies in this area suggest that tourism has the potential to uplift rural economies when managed sustainably (Zhu et al., 2022). However, these studies rarely examine how the disparity between policy intent and implementation can influence the efficacy of the policy in fostering sustainable tourism development. In the case of Zambia, this is despite the World Bank's *Green Resilient and Transformational Tourism Development Project*, which highlights several structural weaknesses in the country's tourism governance, including limited institutional capacity and fragmented stakeholder coordination (World Bank, 2023). Again, these weaknesses have not been independently analysed by scholars to assess the country's readiness and capacity to develop sustainable tourism.

More recent studies in this area confirm that tourism in Zambia remains underdeveloped due to fragmented policy frameworks, limited community engagement, and inadequate stakeholder collaboration (Tembo & Ndalamei, 2022; Mwansa, 2023). Particularly, while the Kafue River Catchment generates significant tourism revenue, local communities often receive minimal economic benefits, leading to persistent poverty and social inequality (Tembo & Ndalamei, 2022). But these studies focus on either conservation or economic aspects in isolation; none have critically analysed the interplay between policy and community dynamics in promoting sustainable tourism. This creates a knowledge gap that necessitates a comprehensive analysis of the current legal framework and its effectiveness in promoting sustainable tourism in Zambia.

This paper addresses this gap directly by analysing the current policy provisions and their adequacy (and/or inadequacy) in supporting sustainable tourism in Zambia's Kafue River Catchment and the nation as a whole. By addressing these issues, the paper contributes to debates on tourism policy and policy innovations, which, in turn, enhance community empowerment and support the ecological and cultural integrity of the Kafue River Catchment.

1.1 Research Objective

This study aims to analyse Zambia's current tourism policy provisions and their adequacy (and/or inadequacy) in supporting sustainable tourism in Zambia's Kafue River Catchment and the nation as a whole.

II. LITERATURE REVIEW

2.1 Theoretical Review

This study analyses Zambia's current tourism policy provisions and their adequacy (and/or inadequacy) in supporting sustainable tourism in Zambia's Kafue River Catchment and the nation as a whole using the Sustainability Theory. The Sustainability Theory underscores the need to meet present needs without compromising the ability of future generations to meet theirs (World Commission on Environment and Development [WCED], 1987). This calls for any developmental project to strike a balance between current aspirations and future material conditions (Harrington, 2016). In particular, the Sustainability Theory emphasises the need for the government or project implementors to strike a balance between economic growth, social equity, and environmental protection. These are referred to as critical pillars of sustainability.

Sustainability in tourism requires a delicate balance among all three competing interests – economic, social and environmental. Indeed, it is not possible to sustain everything, everywhere and forever, but it is important to make a clear choice about what can be sustained, how it can be sustained and for how long that which is prioritised can be sustained (Harrington, 2016: 10). This is where policy plays a critical role as it provides logical answers to all these questions.

Relatedly, for sustainable tourism in the Kafue River Catchment to prosper, the national tourism policy must prioritise and mainstream issues along these sustainability pillars, to which it must apportion equal commitments. Without doing so, one pillar (economic, social, environmental, or even political) is bound to thrive at the expense of others. When this happens, it may lead to a situation where tourism thrives economically for a small clique of investors, or where the investors and local communities are benefiting fairly but at the expense of the environment.

To avoid this scenario, Community-Based Tourism (CBT) approaches have emerged that draw on the principles of sustainability to advocate for the involvement of local communities in tourism development. The gist of these approaches is that sustainability in tourism can only be achieved when locals are empowered (Hall & Richards, 2003). That is, the money realised from tourism is kept in the community, enough quality jobs are created for the locals, and the local communities are involved in decision-making concerning tourism projects that affect their livelihoods.

2.2 Empirical Review

Tourism serves as a powerful economic engine in many economies, creating jobs, other socio-economic opportunities, and cross-cultural exchanges. Yet, its emphasis on consumption and maximising investors' profits has exacted a significant toll on biodiversity and local communities (Dhungana, 2024). Communities in this mass tourism adventure have endured deforestation, water and air pollution, cultural dilution and forced displacement and resettlement (Hargreaves et al., 2013). This makes tourism a double-edged sword, promoting economic development in tourism destinations but also inducing several ecological and socio-economic challenges (Kelman, 2021). There is a need for a paradigm shift from mass tourism to sustainable tourism to address this imbalance (Magnusson et al., 2024).

Sustainable tourism, in addition to what was discussed in the previous section, entails new and sustainable practices that eclipse conventional and less sustainable ones. According to Magnusson et al. (2024: 162), this may occur through “a process that involves the formation of new linkages between material elements, images, and skills.” The transition from mass to sustainable tourism can be guided by a radical shift in policy and practice toward a more collaborative stance, striking a balance between ecological conservation and the desire for socio-economic benefits. This can be achieved through policy alignments (Hargreaves et al., 2013; Svennevik, 2022; Magnusson et al., 2024).

In Sub-Saharan Africa (SSA), the transition to sustainable tourism is unfolding at a much slower pace (Danquah & Mohammed, 2025), partly because tourism development there is seen in terms of tourist arrivals (Folarin et al., 2017; Xuanming et al., 2024), which promotes a false sense of tourism growth in the region (Adeniyi & Folarin, 2020). This calls for a shift in the legal framework toward sustainable tourism to change the focus.

A few countries in the SSA have begun to pursue sustainable tourism through community empowerment (e.g., Namibia, Rwanda and Kenya), strict biodiversity conservation models (Botswana and Seychelles), and eco-lodge innovation (e.g., Principe and South Africa). These countries have since integrated local communities as partners in tourism, yielding significant success in both tourism and biodiversity conservation (Seraj et al., 2025).

Zambia’s tourism policies have grown over the years. Initially, they focused more on growth and investment, without paying necessary attention to ecological management. In fact, they did not emphasise sustainability as an indispensable aspect of the tourism industry. Instead, they focused on the here-and-now issues of tourism.

More recently, Zambia’s tourism legal framework has shifted towards sustainability, mirroring the emerging trend at both the regional and global levels. The launch of the *Kafue National Park General Management Plan 2025–2035* marks a significant milestone in aligning conservation goals with tourism strategies, aiming to foster inclusive governance and community participation (Ministry of Tourism, 2025). Yet, as shown above, needs to be done. What and how exactly needs to be done is what this paper seeks to deliver. But next, it focuses on the policy provisions.

2.2.1 Policy Provisions for Sustainable Tourism in Zambia’s Kafue River Catchment

Policy frameworks serve as the backbone of sustainable tourism, providing guidelines for managing tourism activities. To achieve this, effective tourism policies must address critical areas, such as resource management, infrastructure development, and stakeholder engagement (Dangi & Jamal, 2022). In doing so, the policies must have clear objectives, inclusive stakeholder participation, and mechanisms for monitoring and enforcement to meet this expectation. On the contrary, many developing countries, particularly in sub-Saharan Africa, are characterised by weak governance, insufficient funding, and limited policy implementation (Chirenje et al., 2021).

In Zambia, for example, policies designed to protect natural resources often fail to yield tangible outcomes on the ground, partly due to inadequate institutional capacity and local community involvement (Silungwe et al., 2020). Oftentimes, these policies are good on paper but lack proper implementation mechanisms (O’Bright & Besada, 2020). This gap between policy design and practice reflects structural weaknesses within institutions responsible for natural resource governance (Tenure Security Facility, 2020; Panos Institute Southern Africa, 2021), which are often constrained by governance barriers, reducing incentives for sustainable practices.

This disconnect highlights the need for adaptive policies that respond to local realities while promoting sustainability. In short, sustainable tourism is not a one-size-fits-all; it must be tailored to local conditions. Does Zambia have policies to achieve this? This study addresses this question by analysing the current policy provisions and their adequacy (and/or inadequacy) in supporting sustainable tourism in Zambia’s Kafue River Catchment and the nation as a whole. Currently, Zambia is regarded as one of the best tourism investment destinations in the world, with the sector contributing modestly to the nation’s Gross Domestic Product (Silungwe et al., 2020). With sustainable tourism, the paper argues that the tourism sector can be transformed into Zambia’s top GDP and a foreign exchange earner.

III. METHODOLOGY

3.1 Research Design and Approach

This study adopted a constructivist philosophical paradigm, which posits that reality is socially constructed and subjective. The constructivist approach emphasises understanding the meanings and experiences of individuals and communities within their specific contexts (Creswell & Poth, 2021). It aligns with the study’s aim of analysing the current policy provisions and their adequacy (and/or inadequacy) in supporting sustainable tourism in the Kafue River Catchment, uncovering practical insights into policy effectiveness, gaps, and opportunities for reform. Understanding these perspectives is essential for proposing suitable tourism policy interventions that not only support biodiversity conservation but also empower the local people. Overall, it was a case study research approach.

3.2 Study Area

This study focuses on the Lower Kafue River Catchment, from Kafue in Lusaka Province down to Chirundu in Southern Province. But for data collection, eight communities within this expansive region were primarily selected

based on their location and size. These communities include: Mafungautsi, Kambale, Bridge, Kandende, Muyangana, Royal Park, Lufupa, and Mukambi. Participants for interviews and focus group discussions were drawn from these communities.

3.3 Target Population

The Lower Kafue River Catchment, particularly the site targeted by this study, comprises approximately 200 households, five customary chiefs and 12 established businesses, including hotels and lodges. This constituted the target population of this study, from which the sample was chosen purposefully in line with Creswell and Poth's (2021) guidance.

The underlying logic was to ensure that a representative sample was obtained. That is, the key informants who would provide relevant and rich information about sustainable tourism policies in Zambia and how those policies were being implemented in the Kafue River Catchment, as well as the local people who would draw on their experiences to demonstrate the impacts of those policies on the local communities.

3.4 Sampling Procedures and Sample Size

Data were obtained from a total of twenty-one (24) participants, consisting of eighteen (21) community members (16 households, 2 customary chiefs, and 3 businesses) engaged in tourism-related activities and three (3) key policymakers representing the Ministry of Tourism (MoT), the Hotel and Catering Association of Zambia (HCAZ), and the Zambia Institute for Policy Analysis and Research (ZIPAR). Palinkas et al. (2015) justify the inclusion of participants based on their unique lived experiences. Criterion sampling, a type of purposive sampling, was used to select a sample of individuals with the relevant experiences.

Aligned with Creswell and Poth's (2021) guidance, all participants were purposefully selected from among the target population. Two households closest to the chosen businesses and sites were selected, and their household heads were interviewed. Those businesses and policy analysts were also purposefully selected, based primarily on their unique positions and experiences relevant to the subject matter under investigation. Experience and position in the community guaranteed a participant a place in the focus group discussions. In short, two households were purposefully selected from each of the eight chosen communities.

3.5 Data Collection Instruments and Procedure

In-depth interviews were conducted using interview guides to collect data, focusing on participants' insights, experiences and perspectives on policy adequacy and their implementation in the Kafue River Catchment for sustainable tourism (Creswell & Poth, 2021). Participants with diverse backgrounds were involved for the rich data (Loeb et al., 2006). As part of the triangulation of data sources and methods of data collection, eight focus group discussions (one in each community) were conducted to explore collective views on sustainable tourism practices.

Furthermore, policy and other regulatory documents were reviewed to understand existing frameworks and practices in the basin (Creswell & Poth, 2021). Fusch and Ness (2015) explain that saturation is reached when the ability to obtain additional new information has been attained. With 24 in-depth interviews, we can report that data saturation was achieved, and similar and repeated submissions began to be received as early as the 15th interview.

3.6 Data Analysis

A qualitative thematic data analysis approach was employed to analyse data, whose process began with a search for categories, followed by scrutinising emerging patterns and themes (Creswell & Poth, 2021). These themes were derived in line with the Sustainability Theory framework (Bernard, 2000: 443). Finally, an explanatory model was developed by mapping relations between the codes in line with the thematic analysis approach (Bruehl, 2020).

The credibility of the findings was achieved by presenting the first draft of our findings to the participants for their comments and validation. This approach is an established procedure in qualitative research (Birt et al., 2016). Overall, the study drew on Braun and Clarke's (2006) six-phase framework for thematic qualitative analysis and interpretation; the findings illuminate how different actors conceptualise, experience, and operationalise tourism policy.

3.7 Ethical Considerations

Ethical considerations were upheld by ensuring that all participants provided their prior informed consent to participate in the study. To achieve this, participants were informed about the research and the need for their voluntary participation, and assured that the information shared would be used solely for academic purposes. Participants participated of their own free will. No material or cash payments were made to the participants in this study.

IV. FINDINGS & DISCUSSION

4.1 Findings

In this study, the fieldwork involved the face-to-face interactions between researchers and participants. Furthermore, the sampling process was onsite and purposive. That is, for the chosen participants who declined to participate in the study, they were replaced immediately. This ensured a maximum (100%) response rate and the right participants for the study.

Although there were some reshuffles in the preferred participants, the planned number and type of participants were all involved in the study. This may be the advantage of face-to-face methods of data collection that Creswell and Poth (2021) emphasised over virtual and other off-the-field means.

4.1.1 Adequacy and Awareness of Policy Frameworks for Sustainable Tourism

The themes that emerged from the analysis reveal significant gaps between formal policy intentions and the lived realities of community actors, exposing asymmetries of information, participation, and power. These themes include: limited policy awareness and interpretation gaps; perceived adequacy but ineffective dissemination of frameworks; and disconnect between regulatory structures and local realities. Each theme reflects distinct governance dynamics and provides insight into the socio-political ecology of policy implementation in Zambia's tourism sector.

The first theme, Limited Policy Awareness and Interpretation Gaps, demonstrates that community-level understanding of tourism policy is largely confined to operational and transactional elements such as obtaining business licenses, environmental clearances, or council permits. The broader philosophical and strategic dimensions of the policy—such as community participation, environmental stewardship, and equitable benefit-sharing—were rarely articulated. Participants expressed a clear lack of knowledge or awareness of the policy provisions.

Surprisingly, even some of the key players in the industry exhibited similar ignorance about the policy and its provisions. As one local lodge proprietor narrated, “I’m only aware of the license regarding business operations, but other policies or regulations are not available to me. Maybe you are aware of any significant policies or provisions; tell me.” (*Participant C, Kafue River Catchment*). Another reasonably educated local, with a university degree, expressed similar ignorance: “Not aware of any regulatory laws regarding tourism” (*Participant E, Kafue River Catchment*).

Business owners consistently reported that they had not been sensitised on the latest tourism policies and changes. One serious challenge they raised was that the policy documents were inaccessible to them. As such, they blamed this on the top-down and bureaucratic tendencies that burden the government ministries and departments in Zambia. One lodge owner and a member of the local community noted, “We only hear about laws when someone is fined or arrested. Before that, no one told us what exactly was allowed or not allowed. Do they expect us to guess?” (*Participant A, Kafue River Catchment*). His counterpart, another lodge owner, bemoaned: “I just follow what others are doing. I’ve never seen a tourism policy or document myself. You know, some of us did not go far in education, but we are businessmen. We need the government to take us through the policy and everything expected of us”. (*Participant D, Kafue River Catchment*).

This reliance on informal knowledge networks reinforces alienation, leaving communities to follow what others are doing rather than engaging directly with policy content.

Although sustainability is central to Zambia's current tourism policy, participants, including some business owners, understood it narrowly, often equating it with environmental cleanliness or business continuity rather than the broader ecological, economic, and social aspirations of the business and the tourism industry in Zambia as a whole. One participant, a hotel owner, explained, “When you say sustainability, I just think of keeping the river clean. We always do so as a hotel. I have told my workers to ensure that the river and the riverbed are always kept clean and free of any foreign material. In this area, at least you can bear with me, I am proud we are doing it.” (*Participant T, Kafue River Catchment*). His fellow hotel proprietor, a foreigner, calmly stated, “I think sustainability in our industry is about making your business continue for a long time, even when you are dead as a founder. This requires that you involve some of your key family members, such as children and your spouse, in the business so that when you are no longer there, they can continue. I have been working with my eldest son and daughter. My wife also comes along sometimes. So, for me, I am ensuring sustainability that the industry requires” (*Participant K, Kafue River Catchment*).

Other participants also exhibited a shallow understanding of the concept of sustainability in tourism. One customary leader claimed, “Sustainability for us means that these hotel and lodge owners must be giving us part of their profit, and we should be sitting on their management boards. We’re the owners of the resources, so we should benefit” (*Participant F, Kafue River Catchment*). Another community member said, “Sustainability means all the jobs in these lodges and hotels must be given to us, the local people, not outsiders” (*Participant G, Kafue River Catchment*).

The second theme, Perceived Adequacy but Ineffective Dissemination of Frameworks, highlights the paradox of formal sufficiency and practical deficiency. Institutional informants expressed strong confidence in the adequacy of Zambia's tourism policy framework: “We operate under the National Tourism Policy, the Tourism and Hospitality Law, and the Tourism Master Plan, which guides standards and professional practice.” (*Participant M, Lusaka*). The

government was also optimistic that it would grow “sustainable tourism through the National Tourism Policy, and we are enhancing community involvement under the Tourism Master Plan.” (*Participant U, Lusaka*). But this institutional optimism contrasts sharply with community perceptions, where policies are seen as distant and abstract. Some communities, particularly those near formal tourism enclaves such as Royal Park and Lufupa River Camp, demonstrated awareness of regulatory agencies like WARMA and the Marine Police; nevertheless, they did not demonstrate strong policy ownership or empowerment (*Participant J, Kafue River Catchment Participant G, Lusaka*).

The third theme, Disconnect between Regulatory Structures and Local Realities, reveals the structural exclusion of communities from tourism governance. Across nearly all sites, participants expressed frustration at being excluded from tourism planning and the benefits it provides. “Restricted access to the river through fencing should not be tolerated”, participants charged (*Participant A; Participant N; Participant O, Participant B, Kafue River Catchment*). One ordinary community member lamented, “The law says all the jobs must be given to the locals, but here almost all jobs in hotels and lodges are given to outsiders and foreigners. The government should help us talk to these people [business owners].” (*Participant F, Kafue River Catchment*).

Ordinary members reported restricted access to natural resources, such as rivers fenced off by investors, and employment patterns that favoured outsiders, leaving locals with only low-value jobs. Even where Corporate Social Responsibility initiatives existed, for example, boreholes or road construction, the community viewed them as tokenistic. “Tourism operators provide boreholes, but we are not fully involved in their project. We don’t know how much they make and what constitutes the share they gave us in the form of the borehole” (*Participant E, Kafue River Catchment*).

Table 1

Cross-Community Pattern and Thematic Convergence

Spatial Zone	Policy Awareness	Community Involvement	Institutional Support
Mafungautsi	Very Low	Low	Minimal
Kambale/Gotagota	Very Low	Low	Weak
Bridge-Chirundu	Moderate (operational)	Low	Some council presence
Kandende	Very Low	Low	Weak
Kafue Bridge–Muyangana	Low	Minimal	None
Royal Park	Moderate	Moderate	WAMA & Marine visible
Lufupa River Camp	High	Moderate–High	African Parks
Mukambi Safari Area	High	Moderate–High	African Parks & DWNP

Source: Field Data, 2025

The cross-case pattern demonstrates spatial stratification of policy literacy, a form of “policy geography.” The findings show policy awareness clusters around sites of state visibility; local people portrayed a clear disconnection, reflecting an uneven diffusion of the sector governance divide. In communities, such as Lufupa and Mukambi, which were reasonably involved in tourism projects, people demonstrated high awareness of the policy provisions (see Table 1). There, customary chiefs and their subjects were aware of their responsibilities and demonstrated reasonable expectations, as well as cordial community-company relations and collaborations in biodiversity conservation projects.

Figure I illustrates the key gaps inherent in Zambia’s tourism legal framework that require attention.



Figure 1
Conceptual Model of the Policy Awareness–Implementation Gap in Sustainable Tourism Governance
 Source: Authors, 2025

Figure I represent the linear–yet fragmented–flow of policy formulation, communication, and implementation in the Kafue River Catchment. At the top of the model, national policy frameworks (such as the *National Tourism Policy (2015)* and *Tourism and Hospitality Act No. 13 of 2015*) provide the structural foundation for sustainable tourism. However, as the model shows, the effectiveness of these frameworks is mediated by the strength of communication and diffusion mechanisms.

Results from the policy analysis indicate communication remains centralised, often transmitted through bureaucratic or technical channels that fail to reach community actors in accessible forms. Consequently, policy literacy at the local level is weak, with communities perceiving policy as licensing rather than a tool for sustainability and empowerment. This weak literacy undermines community participation and governance, resulting in compliance-based relationships with regulatory authorities and unequal partnerships with investors. The cumulative outcome is a policy-practice dissonance, where sustainability exists in policy discourse but not in local experience.

The feedback loop at the base of the model represents the corrective potential of participatory governance—where local experiences and feedback inform national policy formulation and implementation. Without this loop, policy remains static, detached, and elite-driven. Hence, the model proposes that sustainable tourism development can only be realised through localised communication strategies (policy translation into local languages, community radio, visual tools); participatory structures (district tourism committees, community representation in planning); capacity building and sensitisation programs, and two-way feedback mechanisms between national and local institutions.

Finally, the many gaps and weaknesses identified (see Figure 1) must be addressed to achieve sustainability in Zambia's tourism industry, both at the national and the Kafue River Catchment levels. Key to this success must be inclusivity, transparency, and justice. There should be justice to ensure that no stakeholder is left behind in policy formulation, policy implementation and the distribution of generated costs and benefits. Until then, sustainable tourism in Zambia's Kafue River Catchment remains an elusive dream.

4.2 Discussion

In this study, participants focused on three key aspects of policy: content, implementation, and Justice. Under the content aspect, the findings indicate the existence of a wide policy literacy gap in the Kafue River Catchment. Community members, including some business owners, lack a deeper understanding of the policy contents. This suggests the violation of one critical requirement of a good policy, community participation. It shows local communities were not fully involved in the formulation of the policy. This may support Hall's (2011) observation that tourism policy in the Global South often remains an "instrument of control" rather than a "framework of empowerment." Indeed, the communities in the Lower Kafue River Catchment have not been empowered by the new tourism policy, whose content they are hardly aware of. As Reed (1997) has rightly noted, effective policy depends largely on how well it addresses local concerns and interests. This suggests effective communication between policymakers, implementers and local communities, contrary to what is obtaining in the Kafue River Catchment, where local communities are excluded. Exclusionary communication has been found to hinder effective sector management and growth.

This mirrors Butler's (1999) critique that sustainability in tourism becomes "an imported vocabulary" when not grounded in local epistemologies. This implies that policy meaning-making should never be centralised at the institutional level, leaving grassroots actors disengaged from the conceptual underpinnings of its core contents, such as sustainability. Collectively, the first aspect underscores the epistemic marginalisation of community actors, with policy perceived as external, regulatory, and punitive rather than participatory or developmental. The absence of structured sensitisation and knowledge translation perpetuates a policy-practice disconnect, undermining the essence of sustainable tourism governance. This oversight may preclude the possibility of the policy ever facilitating sustainable tourism in the Catchment that takes into account local communities. Indeed, the content of the current tourism policy has little to do with the interests and concerns of local people in tourist destination areas, such as the Lower Kafue.

The second aspect is implementation. Given the common lack of understanding of the policy, the findings in the previous section revealed that local people were excluded from the policy formulation process. Their lack of involvement in the implementation process also exacerbates the problem for the local communities in the Kafue River Catchment. Regardless of the content, this has the potential to compromise the policy itself and its effectiveness in driving sustainable tourism in the Kafue River Catchment. Most precisely, in the Kafue River catchment, the evidence in the previous section shows that awareness patterns followed institutional visibility rather than grassroots initiative, confirming Cohen and Uphoff's (1980) concept of policy diffusion bias. This, as Wong et al. (2019) argue, breeds inertia and later inefficiency in policy implementation. Zambia's new tourism legal framework is formally sufficient, but its "command-and-control" implementation approach may produce what Hall (2011) terms "implementation voids" by excluding some key actors from its implementation. In this case, the key actors may include the local communities whose inputs and knowledge about the policy remain peripheral, as the findings discussed above demonstrate.

The final aspect of the findings from the Kafue River Catchment case is justice, particularly the redistributive justice inherent in sustainable tourism. The findings clearly showed that the policy was not about seeking justice for the local communities, which are often on the losing side in conventional tourism. Because if this were a priority, then communities could have been the centre of the policy content and implementation, which, as shown above, has not been the case. Like in conventional tourism, business owners, a small group of the elite in society, remain in charge and are in the best position to reap more economic benefits from tourism projects in the Kafue River Catchment, hiding behind the transition to sustainable tourism. Indeed, this runs counter to the tenets of sustainable development (SDG 8 & 12) and sustainability, as prescribed by the Sustainability Theory. Currently, Zambia's tourism policy suffers from what

Teye (2020) describes as structural elitism, where local communities are seen as mere spectators rather than active actors and stakeholders in the sector. There is a need for a *Collaborative Governance Model*, which cultivates trust and shared power as essential prerequisites for growth and sustainability of the tourism sector (Ansell & Gash, 2008).

4.2.1 Implications for Policy and Practice

The findings in this study suggest several imperatives for bridging the institutional–community relations gap. First, policies should be localised and translated into formats that resonate with communities. This requires simplification and dissemination in local languages through community radio, visual aids, and interactive workshops. Such efforts would ensure that policy content is not only accessible but also culturally meaningful.

Second, participatory governance structures should be strengthened. Establishing District Tourism Committees that include community representatives would create opportunities for two-way communication, transforming policy from a directive into a dialogue. This would allow communities to contribute to decision-making processes and foster a sense of ownership.

Third, continuous capacity building is essential. Policy literacy and sustainability education should be integrated into community-based tourism training programs. This would equip local actors with the skills and knowledge necessary to interpret and apply policy frameworks competently, thereby enhancing their agency in tourism development.

Finally, policy implementation feedback and monitoring mechanisms must be introduced. Periodic participatory policy audits would provide a platform for communities to assess how well frameworks align with lived experiences. Such audits would ensure that communities are not only consulted but actively shape evaluation criteria, reinforcing accountability and inclusivity. Collectively, if these interventions were to be implemented, they would shift policy awareness from passive recognition to active co-creation, resonating with Jamal and Getz's (1995) notion of collaborative planning.

V. CONCLUSION & RECOMMENDATIONS

5.1 Conclusion

The National Tourism Policy of 2015, the Tourism and Hospitality Act No. 13 of 2015, as well as the *Kafue National Park General Management Plan 2025–2035*, launched in 2025, constitute Zambia's tourism legal framework. On paper, this legal framework is adequate to promote sustainable tourism in the country as a whole, and the Kafue River Catchment in particular. However, there seems to be an asymmetry between institutional understanding and community awareness, making its implementation challenging. Bridging this gap requires epistemic democratisation: bringing policy discourse to the people in the languages, formats, and contexts they are familiar with.

Sustainable tourism can only blossom when local communities are fully involved in both the policy formulation and implementation processes. However, the findings in this study suggest that, in its current form, the legal framework may not be sufficient to promote sustainable tourism in the Kafue River catchment due to its weaknesses in content, implementation process, and justice. Based on this, the study concludes that there is an urgent need to revisit it to address the identified shortfalls. More broadly, the study contributes to the current debates on sustainable tourism policy in developing countries.

5.2 Recommendations

Besides the many policy implications proposed above, this study recommends that the identified shortfalls in Zambia's tourism legal framework be urgently addressed through the following:

- Localised communication strategies to ensure local ownership of both content and implementation of the policy;
- Participatory governance platforms to act as the grievance mechanism to promote justice in the distribution of costs and benefits in the sector, and
- Continuous capacity building of stakeholders, including officers responsible for the implementation and monitoring of the policy, community members and business owners, to ensure smooth implementation of the policy.

It is believed that implementing the above can promote sustainable tourism in the Kafue River Catchment and the nation as a whole.

Declaration of Interest

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