Mini Prasannakumar (Director, Ministry of Tourism, India)

1. **Overall structure and framing of SF-MST**

   Key questions for consideration

   1.1. Does the introduction provide appropriate context and explanation of the role of the SF-MST? Are there other topics and issues that should be included in the introduction? Is the structure/logic of the introduction appropriate?

   **Comments:** There is need for specific measurable indicators.

   1.2. Are you happy with the conceptual framing of the SF-MST using a multiple capitals-based approach to the organisation of data on the different dimensions of tourism activity?

   **Comments:** There is need for specific measurable indicators.

   1.3. Across chapters 2, 3 and 4 covering the economic, environmental and social dimensions, are there significant missing topics or themes?

1.4. This draft includes a new chapter, chapter 6, on indicators and analysis. Is this inclusion appropriate?

   **Comments:** There is need for specific measurable indicators.

   1.5. Any other comments or questions on the overall coverage and structure of the draft SF-MST?

   **Comments/Views:** No specific comments.

2. **Employment aspects in measuring the sustainability of tourism**

2.1. What are the key aspects concerning employment that are relevant in measuring the sustainability of tourism?

   **Comments/Views:** Employment opportunities, Job security, adequate representation of local people in employment in tourism industry and safe working environment may be considered as key aspects concerning employment in measuring sustainability of tourism.

2.2. What aspects of the concept of decent work are of most importance for policy and to what extent are they measurable?

   **Comments/Views:** Adequate earnings and productive work, job security, equal opportunity and remuneration, social dialogue and representation etc. may be treated as the important aspects of decent works.

2.3. In practice, what do you see as the main challenges in collecting additional detail on employment in tourism industries?

   **Comments/Views:** Employment in tourism industry involves a disproportionately high degree of Employers/ owners/proprietors, as well as own-account workers (selfemployed) i.e. those who work on contractual basis for a specified period of time with no formal employer employee relationship. Information on these entities is usually difficult to obtain and, from the employer’s point of view, they are considered an intermediate cost, and not as part of labourers. People come to tourism with varied backgrounds and professional educations and leave it for a range of other economic
activities. In view of these reasons, it is difficult to collect income, compensation, hours of work of persons employed and their conditions of work in the tourism sector from any administrative record.

3. **Measuring the environmental sustainability of tourism**

3.1. Does the chapter on the environment dimension cover all of the relevant areas for the measuring the environmental sustainability of tourism?

3.2. Does the chapter appropriately describe the link between tourism activity and environmental assets?

3.3. What role do you see for ecosystem accounting approaches in the SF-MST?

*Comments/Views:* Tourism is fully dependent on the natural resources of a destination like: wildlife, beaches, mountains, lakes, coastal zones, dunes, mangroves, rivers, estuaries, forests, wetlands etc. Without these natural resources, tourism does not exist in any destination. Man-made attractions have generally little to do with creating interest in visitors. Therefore, it is necessary to record and measure the current composition and changes in tourism related ecosystem assets for measuring the flows of ecosystem services so as to enable the policy makers to frame adequate policies to preserve the assets in a sustainable manner. Therefore, the ecosystem accounting approaches stipulated in the SF-MST, is relevant for measuring the impact of tourism on these ecosystems. iv. In practice, what do you see as the main challenges in collecting environmental data in relation to tourism activity?

*Comments/Views:* Collection of data related to the environmental assets, its changes over time, measuring the condition of these assets over time etc. Is a tedious job. Demarcation of the flows of ecosystem services to different users, including visitors, permanent residents of the area and others would be a difficult task.

4. **Measuring the social sustainability of tourism**

4.1. Does the limited text describing the chapter on the social dimension cover all of the relevant approaches and aspects for the measuring the social sustainability of tourism?

4.2. What are the most important perspectives to consider in assessing the social dimension?

*Comments/Views:* Host communities perspectives are to be considered as the most important aspect in assessing the social dimension of sustainable tourism.

4.3. Establishing standard measures of social capital will be challenging in the short term. Is it sufficient for the SF-MST to focus on framing the measurement of the social dimension in terms of selected indicators?

*Comments/Views:* The selected indicators (social connections and networks, community and individual levels of trust / tolerance, civic engagement and participation in Institutions and governance, corruption, subjective well-being etc of host communities and visitors) are sufficient to measure the social capital. However, it is very difficult to Collect data. Limited indicators are sufficient, instead of defining more indicators with non-availability/difficulty in collecting related data.

4.4. In practice, what do you see as the main challenges in collecting social data in relation to tourism activity?
Comments/Views: Collection of data on different aspects of social dimensions itself is very tedious. Moreover, bifurcation of these data as a consequence of tourism and non-tourism activity is a much more difficult task. Overlapping cannot be ignored.

5. Defining spatial areas for tourism measurement

5.1. The SF-MST proposed 6 spatial scales from global to local levels. Is this appropriate and is the labeling of these levels suitable?

Comments/Views: Labeling are suitable which cover all segments of spatial area. However, within national, country specific sub national spatial area may be decided by respective economies.

5.2. Are there particular themes that should be the focus of measurement at sub-national level?

Comments/Views: Administrative unit may be kept as first sub national level for comparison purpose. Within sub national level, visitor concentration may be the basis for further spatial bifurcation.

5.3. The approach to defining spatial areas is based on establishing principles for measurement based on the idea of tourism concentrations. Is this an appropriate approach?

Comments/Views: Since the measurement is for sustainability of tourism, spatial area is to be selected according to the tourism importance. Therefore, the proposed approach is appropriate.

5.4. In practice, what do you see as the main challenges in collecting sub-national data in relation to tourism activity?

Comments/Views: There are some data that may seem relatively non-spatial in nature. For example, visitor perceptions, migrant labour movements and climate change indicators. Therefore the different spatial areas may be considered for different dimensions like economic, social and environmental according to the availability of data.

6. MST connections to sustainable development indicators

6.1. Are the UN SDGs a good, useful or sufficient framing for determining a set of indicators on the sustainability of tourism?

Comments/Views: Yes. However, non availability of data, difficulty in collecting available data, and non availability of proper methodology for measurement of the indicators are the constraints.

6.2. What are the priority themes for the development of indicators?

Comments/Views: Impact of tourism on Economical, social and ecological aspects are to be considered as priority themes.

6.3. What are the main barriers to the collection of data to derive indicators and what needs to be put in place to support the use of indicators in decision making processes?

Comments/Views: Non-availability of data, difficulty in collecting available data, and non-availability of proper methodology for measurement of the indicators are the constraints. The methodology for measuring Sustainable Tourism should be focused on administrative data rather than Survey based data. Hence the indicators should be
chosen in such a way that they are available from administrative records. It would be difficult for a country like India to collect various data through surveys especially related to social and environmental dimensions of tourism on annual basis. The surveys would be very costly and time consuming.

7. **Other comments**

7.1. Do you have any other comments on the SF-MST at this stage?

**Comments/Views:** The methodology for measuring Sustainable Tourism should be focused on administrative data rather than Survey based data. Hence the indicators should be chosen in such a way that they are available from administrative records. It would be difficult for a country like India to collect various data through surveys especially related to social and environmental dimensions of tourism on annual basis. The surveys would be very costly and time consuming.