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Some suggestions regarding chapter 5

1. Title

As far I understand it, this chapter “*Defining spatial areas for the measurement of sustainable tourism*” has the ambition to address a first statistical based reflection about the measurement of tourism at subnational levels; obviously a classification of territorial entities is a key issue to address but there are many others too (such as supporting key tourism stakeholders at different spatial scales providing the appropriate data they need, what are the main activities of visitors while at destination,... and a long etc.)

Consequently, *Measuring the sustainability of tourism at subnational levels* sounds to me a more appropriate title.

2. Main challenges regarding data collection

I would suggest that the new version of the Consultation Draft include a new paragraph referring to UNWTO provision of future technical assistance and capacity building support as well as guidance about statistical and non-statistical measurement at subnational levels.

Also, last paragraph of Section 5.3 “*The statistical challenge in defining spatial areas*” / *The application of accounting principles*” of the Consultation Draft could include a reference to the opportunity for setting up an articulated national / subnational set of statistical data regarding the main sources used for national tourism measurement.