**Disclaimer:** The following comments are constrained to the Portuguese experience in compiling the following satellite accounts: tourism satellite account (TSA), the Environmental goods and services sector (EGSS) account, the Environmental protection expenditure accounts (EPEA), environmentally related taxes and fees, Physical energy flow accounts (PEFA), Air emissions accounts (AEA) and economy-wide Material flow account (EW-MFA). Portugal does not compile the Water flow account neither the Solid waste account.

**Comments on Chapter 2 - Accounting for the economic dimension**

**2.3.2 Accounting for characteristics of tourism industries**

It is important to stress the idea that being tourism a “demand side activity”, whenever tourism characteristic activities are the reference (as potential productive agents of tourism, as in TSA Table 5-Production account) a broad concept of tourism is implicit. Total demand from visitors is not produced exclusively by tourism characteristic activities and total production of tourism characteristic activities is not demanded by visitors. This is a “limitation” of the “tourism characteristic activities” approach, but, nonetheless, it is a fair approach since it sums up the core of tourism. Afterwards, if actual tourism production is to be considered, as TSA-Table 6- tourism ratios by activity will have to be considered.

To compile table 6, after the demand level is established, hypotheses have to be made to allocate the counterpart of tourism production across the several activities. This implies a first level of arbitrariness since, in fact, there is no data source about “which industries visitors go to”, only which products they buy. Taking the restaurant activity within the TSA as an example, there is no set of establishments/entities associated to tourism; only a certain amount of production is considered as touristic. Then choosing the “environmental” activities/companies among those will bring another level of arbitrariness. The use of a business register would not solve this issue.

**2.3.6 Extending the TSA to record environmental transactions and eco-tourism operations**

Within chapter 2, on the economic dimension, it is mentioned several times that an establishment approach of the TSA industries/tourism activities can solve part of the needs for the sustainability measurement and indicators.

If not the establishment level, the industry/activity/company level is, in fact, apparently, a way of merging tourism and environmental statistical standards and answer to the SF-MST information needs. This is true in what concerns the environmental transactions, at least those that are derived by industry and from a bottom-up approach, departing from the company/establishment information (as it is the case of those transactions related to payments of environmental taxes) and the physical flow accounts (energy flow and the GHG emissions).

In the case of the environmental transactions within the Environmental goods and services sector (EGSS) accounts, it is not expected that a significant number of entities from its universe falls under the tourism characteristic activities. Thus, even though the intersection of EGSS and TSA is possible in theory, in practice this intersection will probably be nearly empty.

Extending the TSA through the classification of eco-tourism operations will depend on the existence of information on those establishments/operations as, for instance, the existence of some kind of “environmental certification”.

Furthermore, the different level of detail of industry classification between the TSA and the environmental statistical standards is other potential issue. For instance, Accommodation and
Restaurants, within the environmental standards are always aggregated; also transports don’t refer only to passenger transport.

2.4 Measuring the employment aspects of tourism

Some notes:

Like Canada: from a measurement perspective, the employment aspect in sustainable tourism should be limited to employment in the tourism industries.

Green jobs: In Portugal “green jobs” are presently being assumed as the employment, measured as FTE, compiled within the EGSS account. It refers to the FTE associated with the EGSS production aggregate by NACE and environmental domain.

Comments on Chapter 3 - Accounting for the environmental dimension

3.3.4 Accounts for GHG emissions for tourism industries

Independently of the difficulty of the estimation, Households should also be mentioned as producers of GHFG emissions. The GHFG emissions account predicts households as “emissions’ suppliers” and the value refers almost entirely to “own transport”. In a tourism context, travels by car are significant. Also secondary houses are exclusively for tourism use (by convention within the TSA), so an amount of emissions related to accommodation service consumption of these houses would also be possible, in theory.

The reading and understanding of the absolute values of emissions estimated are somehow hermetic. The information would be more interesting if compared with the total economy: a percentage of emissions of the tourism activities would fit that purpose.

Page 31, footnote 13, the link is not working.

Comments on Chapter 6 - MST connections to sustainable development indicators

From our perspective, the UN SDGs are a useful framing for determining a set of indicators on the sustainability of tourism, since this is a complex issue, difficult to summarize in three indicators. Nevertheless, the existence of a worldwide framework is important for international comparisons.

The priority themes for the development of indicators are population (namely gentrification) and environment.

From a statistical point of view, the main barrier to the collection of data to derive indicators is the definition of sustainable tourism industries in statistical terms. What needs to be put in place to support the use of indicators in decision making processes is, besides the existence of resources to collect data and compile statistics, communication. TSA still has a complex language, difficult to communicate to general users and politicians.