

**General comments not only directed to the sub-national scale or to the issue of defining spatial areas**

If we are analysing tourism as a multidimensional activity we are obliged to avoid duplication of tasks, and it is desirable to involve departments dealing with official statistics for tourism (Eurostat, National Statistical Institutes, UNWTO,...), as well as those dealing with official statistics related to the Environment, Culture, Education, Employment and others at International, national and regional level.

There are some very relevant aspects affecting directly the sustainability of Tourism and even Sustainability in general terms where there is still path to improve, but that are under the competency of other departments. For the following aspects, we are obliged to collaborate if our aim is to get an integrated approach of sustainability:

- **Water consumption:** the provision of water to the different consumers (households, retailers, industry ...) needs to be quantified for the billing of the services. This information is even individualised by each customer. However, this data is usually in private hands that are not properly approached for the provision of the necessary aggregated information for public policy purposes.
- **Energy consumption:** similar situation can be applied to the data about energy consumption necessary for billing different typologies of customers. Concern about energy price and consumption is not an exclusive concern of the tourism sector: aspects as energy poverty and competition policy share the same need for data. In addition, the source of renewable energy is already quantified for other policy purposes (usually environmental). Official statistics bodies could benefit from this already existent data, that is, at its origin, very detailed located in the territory.
- **Waste generation and management:** again, this is usually a service provided to different customers for which they need to pay a price (sometimes a public price), but for which there is a need to know the amount and type of waste generated by each locality for the proper management. The correct management and recycling of waste is not only a concern for the tourism sector, so there is here also the possibility of joining forces with other sectors lacking proper information for management (local finances, agriculture, industry...) for the official statistics to prioritize this correct and territorially disaggregated information.
- **Education:** Tourism is not clearly integrated in the International Standard Classification of Education (ISCED), therefore, there is no a specific classification of post-compulsory education (vocational training, University, etc...) of tourism to be compared in a homogeneous way with the rest of sectors.
- **Quality (decent) jobs** and its link with education statistics: Tourism has traditionally been identified as supported by non-skilled workers, but this cannot be monitored and changed by policy actions if we do not have sound statistics to sustain them. If there is a need to assess if the tourism workforce is under or over skilled, we need adjusted Education statistics and we must be able to identify whether tourism workers have specialized education in tourism.

Difference of speed is applicable to official statistics bodies, where measurement of new situations is usually taken into account after the first concerns have arisen. New actors are gaining positions and therefore, monitoring their implications in the tourism sector becomes also more difficult. In this sense, there are already on the table some issues where the official statistics needs to start working on definitions, designing methodologies and (perhaps) implementing regulation. Some of those are:

- **Digital platforms** and the so-called “sharing economy”. Developing common metrics to measure supply and demand to understand their role in the whole system of tourism and their impact on the territories and communities, to address the impact on the employment, to work towards a clear definition and differentiation between private and commercial hosts.
- **Big Data:** Some big data solutions conflict with traditional data analysis, and there is a need of building consensus between both sources of information. Budgetary considerations, as some private stakeholders that are Big Data generators (mobile phone enterprises, OTAs, digital platforms,...) had created a business model from the release of their data.
- **Accessibility:** Definition and measurement of variables related with accessibility and inclusive tourism. The measurement of accessibility for tourism resources has been a difficult task to undertake, given the lack of official sources. The information available is the one provided by private organization of disabled people, which in many cases even provide a directory about accessible tourism resources. Collaboration with these organisations could help to improve the official measurement of inclusive tourism.
- **Certifications:** Quality certification and standards definition and statistics. As it is the case for accessibility, the information available is the one provided by the private organisation, but differently as with the previous case, the access to this information is not always easy.

<p><b>Comments more directly linked to the sub-national scale</b></p>
---

From our point of view, delineating sub-national level tourism areas requires the **application of the management criteria**. The statement “you cannot manage what you cannot measure” should be the basis for this concern.

The challenge of the territorial dimension for the elaboration of the indicators is directly related with the issues affecting different government levels.

At the global and country level aspects such as global warming, climate change, CO2 emissions, and Sustainable Development Goals commitments are priorities, so there must be a system of reliable and sound statistics to deal with these issues. In this respect UN Statistical Division and UNWTO with the Measuring Sustainable Tourism initiative are doing the right job.

In the case of most European Regions, having full competencies in tourism, the available statistics or indicators must be able to answer questions like:

- Is tourism a net contributor to sustainable development?
- Compared to other industries or the whole economy, how resource intense is tourism?
- Is my economy too dependent on tourism?
- How is seasonality affecting the quality of jobs?

For local destinations the questions to be answered are:

- Is Tourism affecting any valuable ecosystem?
- How does tourism compare to alternative uses of land?
- How happy is the local population with the flow of tourists in peak season?

It is very important also to identify the real need of information of the different spatial levels. It needs to be a balance between the cost and the utility of the final system. In this sense, the role of freely available official data is crucial.

Other relevant aspect to take into account, are the real competencies in terms of tourism policy at each government or territorial level, because depending on them, then the requirements for information will be different.

If a destination does not have competencies in terms of tourism policy, then the elaboration of, for example, a TSA in order to include its magnitudes in the measurement of sustainability will not make sense, and then we could use some indirect measures in order to understand the economic importance of tourism, and not a fully integrated account based system of tourism statistics.

Based on our experience on NECSTouR and MITOMED+, we can extract some of the main concerns that can shade some light for the identification of the key issues to consider in the development of sub-national level data sets for measuring the sustainability of tourism.

- NECSTouR and its indicator Working Group: 37 strong European Regions have been working on the identification of needs within the European statistical system, the need of integrating economic, environmental, cultural and social dimensions within the tourism sector data and the need of maintaining this data in a continuous manner in order to establish trends. In addition, within this Working Group, it has been identified the relevant role of official statistics, methodologies and definitions in order to have a rigorous and homogeneous system allowing a sound benchmarking.

- MITOMED+ Interreg project: Andalusia, NECSTouR and Tuscany Region are partners of this project as well as of the Platform of Smart Specialisation for Tourism. 15 pilot destinations through the Mediterranean Europe are testing a homogeneous system of indicators for their integration into the decision-making process and empowerment of tourism stakeholders and destination managers.

### **Design of a system of indicators sustainable over time**

Using jointly defined methodologies between data producers and data users. The need of having a unique system of indicator has been identified through all the consultations and working groups as a priority.

Extensive work has been devoted to the design of these complete systems of indicators; therefore we intend to make use of already existing advances in this respect.

Worth mentioning is the work of the **UNWTO**: “Statistical Framework for Measuring Sustainable Tourism”, even though at the moment significant advances are only clear for the environmental sustainability of the Tourism Sector.

This document identifies the aspects necessary to measure tourism environmental sustainability that have already been worked for the development of System of Environmental Account. This framework will help the compilation of data and figures more homogeneous.

**INSTO** initiative proposal does not define nor endorse specific indicators but instead delineate more generic issue areas that need to be monitored such as Seasonality, employment, Destination economic benefits, Governance, local satisfaction, energy management, water management and waste management.

**ETIS** initiative endorsed by DG Grow that finally provided a toolkit for 2016 was an important step forward, but, after the 2 pilot experiences where more than 100 destinations joined, we have not seen a real follow up by the European Commission. In addition, ETIS has not been nor endorsed not supported enough by the European Statistical System, and it would be desirable a joint effort in this respect.

The system of indicators claimed by the sector is not only needed for designing policies but also for monitoring and follow up of the policy actions.

In this system of indicators, not only the economic dimension must be integrated, but also the environmental, and especially the social one, given the interest shown in this respect.

## **Reconciliation of producers and users of data work**

This is another priority expressed by European Regions, as it is perceived a distancing between producers and users of data. It is important to match those issues included in the political agenda (like sustainable and inclusive tourism) to be integrated in the statistical priorities like the measurement of accessibility.

Working together with Eurostat and the European Statistical System can be positive in including some issues at the top of the political agenda for tourism such as sustainability, accessibility and quality of jobs for their inclusion in the official statistics priorities.

Therefore collaboration (like data gaps analysis, specific events or working groups) of producers and users of statistics are very useful for identifying needs and best practices in the measurement of this specific topics, such as sustainability, accessibility, and also for others like the measurement of the so called collaborative economy, residents' attitudes towards tourism, big data... in order to provide the policy-makers with policy relevant indicators that are statistically based.

All the stakeholders consulted have also identified as very relevant to implement specific actions towards the coordination of information produced for measuring sustainable tourism at different geographical level (European, national, regional or local).

## **Provision of skills and capacity-building**

These activities should be directed for the provision of skills and capacity-building for different stakeholders: private sector, destination managers, public officers, data producers...

For the private sector these specific skills could be focussed on how to take decisions based on data: georeferenced information, Revenue Management, Search Analytics, market analysis, ...

For destinations managers, DMOs, public administration officers skills like how to use indicators and statistics for enhancing tourism sustainability performance, how to manage, how to monitor and how to design policy actions based on data.

For data producers the skills provided will be related to learning to make indicators audience-relevant, skills for results presentations, elaboration of relevant analysis based on data extracting and presenting relevant information for the end user,...