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The territorial vision is essential in the measurement of sustainability; tourism is an essentially territorial activity, the space functions as both the medium (supply of goods and services, consumption of renewable and non-renewable resources, mobility, etc.) and the attraction at the same time, which generates a variety of positive and negative impacts.

Generally, determining context-specific policy responses is most meaningful at finer spatial scales. The need to consider sustainability at finer spatial levels is evident in the almost complete focus on destinations in the conceptual and policy work on sustainable tourism (SF-MST – 5.4).

In SF-MST (1.2.4) it is considered that annual data mask the relevance or impact of the pressure of tourism demand at certain times of the year and it is necessary to incorporate the temporal vision. In the same way it is essential to incorporate the territorial vision, since the national data mask the different tourism realities (coastline, city, interior, natural parks, etc.) and therefore their results as averages do not offer a realistic view of the situation and therefore make it difficult to make sound decisions.

The development of the concept of sustainable tourism over the past 25 years has had a clear and direct focus on the sustainability of tourism activity at a destination level as distinct from considering the broader sustainability of tourism at national or global levels (SF-MST – 5.1).

Relying on national averages is often likely to be misleading and ignore important variations among different areas within a country (SF-MST – 5.4).

In Andalusia we have been working on the measurement of tourism sustainability at two territorial levels: Regional and municipal. Below, the projects developed are briefly described:

Creation and implementation of a **System of Indicators of Sustainable Tourism Development** and synthetic indexes **for Andalusia** that responds to the demand of the General Plan for Sustainable Tourism of Andalusia 2014-2020 to have a system of indicators that makes it possible not only to develop situation diagnoses, but also to monitor and evaluate results, to detect deviations and re-orient tourism policies if necessary.

+ information:

http://www.turismoandaluz.com/estadisticas/sites/default/files/Sist_Indicadores_1.pdf

Andalusia also leads the **working group on indicators in NECSTouR** (Network of European Regions for Competitive and Sustainable Tourism) where 37 European regions have worked on the identification of needs within the European statistical system, the need to integrate the economic, environmental, cultural dimensions and social data within the tourism sector and the need to maintain this data continuously. In addition, within this Working Group, the important role of official statistics, methodologies and definitions has been identified in order to have a rigorous and homogeneous system that allows solid comparative evaluation.

+ information:

<http://www.necstour.eu/working-groups/Indicators>

We are also **active members of INRouTE** (International Network on Regional Economics, Mobility and Tourism) whose contribution has focused on the preparation of the document "A Closer look at Tourism: *Sub-national Measurement and Analysis- Towards a set of UNWTO Guidelines*" which defines methodological aspects for the measurement of tourism at the sub-national level.

+ information:

<http://www.inroutenetwork.org/>
<http://publications.unwto.org/es/node/38335>

On the other hand, **we participate in MITOMED+** (Models of Integrated Tourism in the MEDiterranean Plus) that belongs to the Interreg MED European Projects and aims to increase knowledge and social dialogue in relation to the development of sustainable and responsible maritime and coastal tourism.

Among the different tools that are used to achieve this objective, it is worth highlighting the measurement and monitoring of the sustainability of tourism activity and its economic, social and environmental impacts and consequences through a system of indicators developed at the municipal level.

+ information:

<https://mitomed-plus.interreg-med.eu>

As a result of this experience, the key aspects to be taken into account in the measurement of tourism sustainability at the sub-national level, both from a conceptual and methodological perspective are discussed below. We also include in the last section of this document those aspects that should be taken into account in future developments of the SF-MST document.

1. Key aspects from the conceptual perspective:

- When defining the concept of tourist destination, we must be aware of the separation that exists **between the perception of tourism demand and the defined spatial levels**, which are based on administrative limits to which statistical production and the dissemination of results is linked. In this way, the delimitation of the different spatial scales is intimately related to the administrative structure in tourism management.

Finding a pathway forward will require reconciling the general motivation of statisticians to provide data based on administratively defined spatial boundaries and the reality that the spatial areas of most relevance for the analysis of sustainable tourism do not conform to these boundaries. There is thus a balance to be found between feasibility on the one hand and relevance on the other ... (SF-MST – 5.6).

- **Territorial delimitations must be linked to management**, since this should be the ultimate goal of any measurement.

The measurement systems should be designed to support the decision-making of tourism managers. Therefore, when establishing coherent spatial limits, it is necessary **to take into account territorial competences in terms of tourism policy**, an aspect that should also be considered in the criteria for defining sub-national spatial areas.

Although it is necessary to develop a nested set of spatial areas for the organization and aggregation of statistical information on tourism (SF-MST-5.5), in no case should we lose sight of their analytical and management objective.

From a statistical perspective, the methodological challenge is to develop the structure and tools to support providing relevant information for policy and analysis at the appropriate spatial scale (SF-MST – 5.3).

There are commonly different decisions made at national levels compared to regional and municipal levels and hence there are different types of data that are relevant (SF-MST – 5.4).

Providing data at a spatial scale that is currently most feasible but which is not relevant for decision making and analysis, would not represent a good return on investment. Nonetheless, to the extent that the provision of data on the basis of administrative areas is relatively more tractable it is then important that these spatial areas retain an important place in the proposed structure. (SF-MST – 5.6).

- **The six spatial levels** proposed in the SF-MST do not include **territorial groupings that are customary and of special relevance** due to their own nature and differentiation from the rest, such as groupings of municipalities (e.g., tourism areas: Costa del Sol) or groupings of areas of different municipalities (e.g., Nature Parks).

The following terms are applied in the SF-MST:

Global – referring to all countries and marine areas.

Supra-national areas – referring to groupings of countries.

National – referring to countries.

Regional - referring to the level of administrative unit directly below the national level (corresponds to the NUTS 2 level in the EU territorial classification scheme)

Municipal or city-region - referring to the level of administrative units corresponding to localised but relatively large populations.

Local - referring to the areas or zones within a given municipality that exhibit particularly concentrations or clusters of commonly purposed or aligned activities and businesses. It is not expected that administrative units would be defined at this spatial level.

(SF-MST – 1.3.4)

2. Key aspects from the measurement perspective:

Taking into account the current reality, **it would be hardly realistic to expect the sub-national tourist destinations**, especially at the local level, **to be able to apply and develop TSA and SEEA methodologies**, or for the national methodologies developed in this area to offer the territorial breakdowns necessary for tourism policies, many of which are of sub-national competence.

Territorial breakdowns that are based on a national operation (top-down approach) are appropriate for ensuring that homogeneous information will be available for all the territories and that they will be comparable among themselves and consistent with the estimates for the Nation as a whole, but they present two major drawbacks:

On the one hand, the specific characteristics of each territory are not taken into account, which does not make it possible to adequately represent their structure, limiting the possibilities of further research and analysis of results.

On the other hand, the harmonizing of sources implies the loss of information available in each territory, and therefore observations that may be relevant for one territory may be meaningless in another or in the national set.

Therefore, we propose that the Group of Experts on Measuring the Sustainability of Tourism (UNWTO) develop a specific line of work for **the measurement of sustainability at the sub-national level** based on the creation of **simple and compound indicator systems** as a first step, understanding this as a process that in continuous evolution, in which any advance in definitions, methodologies or statistical and/or/documentation tools should be integrated continuously for its improvement, working towards more complete and complex systems.

Below are the main aspects to be taken into account in the development of these indicator systems are detailed, based on our experience:

- Clearly defining **the objective, the territorial and temporal scope** of analysis and the **user profiles** for which it is intended.

The extent of sustainability will be dependent on the time horizons being considered, the scale of analysis (e.g. local communities or countries), the perspective of the analysis (local business, government official, visitor) and the set of values that are applied (SF-MST – 1.2.1).

Decisions about the appropriate frequency of data collection and reporting should be based on the relevant policy and analytical questions and the available resources (SF-MST – 1.2.4).

- Part of the success in ensuring that a system of indicators is actually used is its **adaptation to the end users** and the **presentation of the results through a friendly and intuitive environment**, in such a way that its users do not require specific training.

Many forms of combined presentations are possible depending on the focus of communication and the range of data available. The data items included in the combined presentations should be of relevance to policy makers ... (SF-MST – 6.2).

- **Taking advantage of existing resources and their continuity over time.** In this respect, the **involvement of the official statistical bodies** takes on special importance (SF-MST - 1.4.2 The role of national statistical offices in implementation).

It is recommended that initial work on the compilation of SF-MST accounts focus on the use of currently available data rather than considering the development of new data sources (SF-MST – 1.4.1).

As for all statistical frameworks, the SF-MST is designed to be implemented on an ongoing basis to provide a consistent and coherent picture of sustainable tourism over time one-off studies do not provide a sufficient base for ongoing decision making (SF-MST – 1.2.4).

The official statistics may be applied at different scales, in particular in the context of geo-spatial statistics and the development of national spatial data infrastructure (SF-MST – 1.4.2).

Their legal mandate may often facilitate access to data sources that are unavailable to others (SF-MST – 1.4.2).

- Evaluating the fact that the **cost** of generating specific information that cannot be obtained from other sources must be **assumable and reasonable**, while always keeping a favourable relationship between said cost and the volume, quality and usefulness of the information obtained.

The selection of which components of the SF-MST should be the focus of measurement should be driven from two perspectives. First, from the perspective of users of information where the question of relevance should be paramount (...). Second, from the perspective of data providers, the question of feasibility will be a fundamental question (SF-MST – 1.4.1).

- Defining a **set of basic indicators** designed for comparability between destinations and **another group adapted to the specific reality of each destination** to be measured, generating and managing the information that it considers relevant for its decision making.

The implementation of the SF-MST does not imply that every economic, environmental and social variable needs to be measured at all scales, from local to national level. Further, the choice of scale at which the SF-MST is applied might vary depending on the topic of interest and the way in which the data may be used in decision making (SF-MST – 1.4.1).

(...) the ambition should be that the information set compiled is both appropriate for the spatial level of analysis and use, and coherent with information at other spatial levels (SF-MST – 5.1).

(...) it will be important to understand that the nature of the policy or analytical question will be different at different scales and hence the type of information that is needed at different scales is likely to be different (SF-MST – 5.1)

- In any case, **consistency with national/international definitions and methodological frameworks** must be ensured.

Regular and reliable information on these types of indicators is best provided by a statistical framework since it ensures consistency in definition of indicators over time (including in the choice of measurement units), the coherence between different indicators and the ability to compare indicators among destinations, regions and countries (SF-MST – 1.4.3).

3. Key aspects to take into account in the future development of the SF-MST document:

- Integration of **new measurement tools** that facilitate obtaining territorial data: **Big data**. This also entails normative work for conceptualization and measurement that tends to favour the comparability of data.

The SF-MST might provide a suitable rationale for the collection of new data or the improvement of existing data sources. (...) the development of new data sources (e.g. mobile phone data) and data integration platforms such as a national spatial data infrastructure (NSDI) (SF-MST – 1.4.1).

The development of statistics commences from a well-established and broadly agreed concept that can be the focus for the development of rigorous definitions, classifications and measurement methods (SF-MST – 1.2.1).

- Incorporating, conceptually and methodologically, in the measurement of sustainability, **aspects that are currently needed and demanded**, such as accessibility, residents' attitudes, the equivalent tourist population or the sharing economy.

Three perspectives are considered central for the measurement of sustainable tourism – the visitor, the host community and tourism businesses. Each represents a different way in which people engage with tourism, either directly or indirectly, and hence each will have different perspectives on tourism's influence on social development (SF-MST – 4.3).

In many cases, the assessment of social aspects at detailed sub-national levels will be relevant – especially from the perspective of host communities (SF-MST – 4.5).

One possible requirement to support the derivation and analysis of indicators is the definition of an equivalent tourism population that allows the use of resources and social impacts to be appropriate compared to other, non-tourism, contexts and situations (SF-MST – 6.3.2).

- Promoting and developing platforms to enable **meetings between users and producers** of statistical information.

One of the key benefits of developing the SF-MST with its broad scope is that it provides a platform for ongoing discussion between data users and data providers as to what aspects of tourism should be the areas of most focus (SF-MST – 1.4.1).

- **Interaction** between the producers of information from **different areas** and the **interoperability of information systems**.

There are very important aspects that directly affect the sustainability of tourism but which are under the competence of other areas or departments (environment, education, transport, etc.). If our objective is to obtain an integrated approach to sustainability, we are obliged to collaborate.

The implementation of SF-MST will require co-ordination of a range of agencies including national tourism administrations, national statistical offices, technical agencies with environmental information, policy agencies, academia and researchers, and the private sector. Indeed, it is important to recognise that there will not be a single data provider. A key task of the leading organization/s will therefore be the co-ordination of the various participants and there are a range of possible institutional arrangements that might be used (SF-MST – 1.4.2).

- **Applications for decision making:** modelling, generation of scenarios, contingency plans, forecasts, delimitation of thresholds, etc.

A coherent set of information, that can support (i) monitoring and reporting (and associated indicators), (ii) evaluation and assessment and (iii) modelling and projections. All of these activities are important parts of the policy and decision-making process (SF-MST – 1.2.4).