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?

I suggest including more often graphical information, particularly in the introduction, to make the document more readable for stakeholders outside academia and national accounts.

One main issue in the introduction is to clarify what do we mean with the sustainability of tourism? My position is that the sustainability of tourism can be approached in three main different perspectives that should be clarified from the very beginning. A) The sustainability of firms and establishments belonging to the tourism industry. B) The sustainability impacts of tourist consumption. C) The sustainability of tourism local destinations. It is important to clearly distinguish these three perspectives to avoid confusion. Sometimes along the text we miss the perspective.

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?

In the field of tourism, multi-capitals approach has the advantage of allowing an integrated overview of sustainability issues and an opportunity to apply and eventually contribute to the development of methodologies designed outside tourism. It is important to use in tourism methodologies that can be used elsewhere having the capacity of integrating tourism sustainability with general sustainability. In addition the nature of tourism promote this kind of interdisciplinar approaches as multi-capitals. Following an approach similar to that contained in the UN System of Economic Environmental Accounting could be considered a natural extension of that powerful way of thinking and organising complex information in the case of tourism.

Nevertheless, I find also important drawbacks of such an approach. First, most of the stakeholders, even those with high tourism skills are not familiar with this kind of approach. Second, the multiple-capitals approach is not familiar for most stakeholders of tourism. Third, the multiple capitals approach has been particularly developed in the context of environmental impacts but there is a lack of methodological support to apply it to social or economic issues in an specific field as tourism.

Anyway, building a statistical framework for MST with the help of multiple-capital approach can serve as conceptual national structure that is then enriched by complementary tourism indicators for both the national and the local level. From a policy oriented perspective the SF MST (that requires a lot of expertise and information and is not easily readable by stakeholders) must be built in parallel to a the local level indicators and presentations, with more direct policy implications.

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

One possible solution for some topics not considered in chapters 2,3 and 4 (because they do not fit in a national statistical framework) is to consider them in chapter 6. This would mean that chapters 2, 3 and 4 are related to the National Statistical Framework for MST (avoiding indicators and local destination issues that could be recalled in chapter 6).

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

This new chapter is completely necessary and should include guidelines for a common set of basic indicators for measuring tourism sustainability. Probably it will not be as methodological powerful as the chapters following a multi-capital approach, but it will be probably more useful for a majority of users of the document. This chapter 6 should contain a set of indicators for local areas designede on chapter 5 (that should just be focused on the delimitation of local areas) and in a less extent, chapter 6 may include a summary of indicators derived from chapters 2,3 and 4.

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

As the times goes on, the chapters of the document must continue gaining coherence and relation. For example, chapters 2, 3 and 4 should be similar in structure. Chapter five and six should be better justified from the beginning. Why do we need more chapters if we have considered the three dimensions of a statistical framework of sustainability in chapters 2, 3 and 4. The answer we think is related to the fact that, because of its different implications, the spatial dimension of tourism has been voluntarily neglected on those chapters. Therefore, on chapter 5 this issue is recalled and the main consequence is presented: the need for the delimitation of local destinations. Finally, chapter 6 should gain relevance if it is integrated with previous chapters and should be converted into one central chapter of the document containing a more practical perspective than that contained in the previous chapters, but keeping a link to all previous chapters.

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? You may wish to consider the *main issues identified by the sub-group on Employment* as well as the individual contributions of three experts to the Working Group meeting on this topic:
   - Canada
   - Cardiff Business School
   - GJASD International

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

Of course, decent work is a central issue, particularly in the field of tourism. However, it is impossible to reach an international agreement on the thresholds of decent work. Anyway, we can select a set of indicators that when analysed together and with the help of qualitative information couldn't provide useful information for designing policies affecting labour conditions.

Therefore, I should avoid using non-tourism concepts that are not accepted by the UN and that is the case of decent work. Instead, we should provide a set of indicators from which stakeholders could draw conclusions. The same applies to green jobs.

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

The main challenge is to have good business registers related with employment and good census information on the areas of influence of tourism (local job markets). Delimiting these areas of interest is necessary to provide policy oriented information. Information on wages would be also of great interest, but difficult to have accurate data because of tips, informal economy, etc.

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?

Despite it is not clarified on the text, the chapter is focused on analysing sustainability from a national point of view and through an ecosystem accounting approach. Issues dealing with the sustainability of local destinations are missing in the chapter probably because the approach selected is not appropriate for this scale. But this local scale is where relevant environmental concerns exist and it is where some policies are designed and demanded. Indicators approach could be a way of dealing with environmental sustainability at local destinations. This can be included either on this chapter 3 or in the chapter 6 related with indicators.

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

It considers a supply approach. It describes the relationship of the tourism industry with the environment. But there are two missing complementary approaches not considered: the demand approach: tourist behaviour and consumption; and the "local destination approach": specific environmental issues in tourism concentrated areas.

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

Developing a framework for the integration of tourism in the SEEA is an important contribution that should be pursued. Nevertheless, in the case of tourism this approach seems insufficient to cope with environmental concerns (see next question).

3.4. In practice, what do you see as the main challenges in collecting environmental data in relation to tourism activity?

The main challenge is that tourism environmental problems are concentrated in local destinations. Therefore, a set of environmental indicators should be proposed. The problem with the environmental indicators is that some of them can be country or destination specific because of local singularities. In addition, indicators cannot be interpreted isolatedly without a context and without the help of a tool in the line of importance-performance analysis. Importance-performance analysis provide us with information not only of the level reached by an indicator but also with the relevance the indicator is given by stakeholders. It is important to have signals of the relevance of each indicator for each place to promote sustainability policies.

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? You may wish to consider the *main issues identified by the sub-group on the* social dimension: *"Statistical Tools to Measure Tourism from a Social Focus"* as well as the individual contributions of three experts to the Working Group meeting on this topic:
- Argentina
- Italy
- Visit Flanders

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

The social dimension of tourism sustainability is strongly related to the welfare of local communities living inside or close to tourism destinations. Dealing with the social dimension requires a local destination related approach.

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?

Of course the SF-MST should not introduce new general concepts related to social accounting that are not still available worldwide. In future extensions of the the SF MST there may be room for a contribution to international statistical standards beyond tourism. But this task exceeds the current objectives of the document..

4.4. In practice, what do you see as the main challenges in collecting social data in relation to tourism activity?

As I mentioned before, the main challenge is to have good business registers related with employment and good census information on the areas of influence of tourism (local job markets). Delimiting these areas of interest is necessary to provide information with policy interest. Social data may not be easily comparable among destinations and should be related to social data of the country. Therefore, conducting surveys in selected local destinations (firms, workers, tourists, residents,…) could be a practical way of approaching to sustainability issues.

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 labelling of these levels suitable?

This classification of six spatial scales is a way of organising information and minds and I think that can be appropriate. However, some of the scales are not used throughout the document because they are not really necessary. Actually, there are fewer relevant scales. One relevant scale is the global scale (since sustainability issues affect all the planet), another is the local scale (the usual environment of some a community where "significant" tourism activity take place) this scale can be sometimes proxied by the municipal scale despite (as a second best solution). For measurement purposes it is better to delimit local destinations as places with tourism relevance, intensity or concentration.

Municipalities (easier) or usual environment of individuals (more complex identification) can be a useful spatial units for measuring the social influence of tourism. Nevertheless, for the economic and the environmental issues may need to delimit the smallest destination we can. This is because it is important not to include inside destinations places without tourism relevance because the data we may obtain can be misleading. This difficulty in delimiting destinations help to explain why the delimitation of destinations must be to a great extent the result of a consensus among tourism boards and stakeholders.

Another issue is the type of tourism local areas. The local destination is one important spatial area but there is another interesting spatial zone: the area of influence. This area of influence is related with several issues: employees in tourism may live within what is called the local job market whose boundaries are bigger than the destination. In addition, the tourists may visit during a day-trip, several places in an extensive area around the destinations and finally, many providers of goods and services to tourists or to the tourism industry may be located in this area surrounding the tourism destination. This area of influence can be chosen in terms of administrative divisions (e.g. municipalities or group of municipalities). In the case of urban tourism, coastal tourism and nature related tourism or visiting friends and relatives, the relevance of tourism destinations and area of influence may vary. Again, the subjectivity of stakeholders should play a role in defining these areas beyond objective indicators.

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

Yes. One important issue is that there is need for a change in the point of view and in the relevance of sustainability issues with respect to a national scale analysis. For example, CO2 emissions of a local tourism destination are not as relevant for the destination stakeholders in this destination as waste production and management, noise or the quality of water in the beach.

In addition to a change in the focus there is a change in the nature of indicators. Most indicators that are relevant at the national or global level are aggregates or averages of data coming from lower layers. By contrast, at the local scale there are several strategic sustainability indicators that cannot be aggregated or hidden behind an average. This is the case of quality of the water, the level of noise, damages to the landscape, depletion of local water resources, impacts to local culture, spills, sanitary conditions, welfare on local population, natural hazards, etc.

Most tourism activity take place within very small places. This fact allows explaining an important share of tourism sustainability by analysing these places that we call local destinations.

Using local destinations as a unit of statistical analysis obliges to introduce another aggregate of other places (non-local tourism destinations or the rest of the country). This "rest" allows a comparison of tourism with "non-tourism" places. Destinations + non-destinations must equal the national/regional total.

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?

Yes, as we have already proposed (Hernández Martín et al., 2016) it is important to combine two main criteria: one related to concentration, intensity or relevance of tourism (either supply side or demand side indicators) and the other related to the tourism destination model (there can be areas completely oriented to tourists, other areas developed around the old town, other areas developed around some attractions, etc. Subjectivity issues, not only objective indicators, are agreed to be necessary to define local destinations and in general, functional areas in Social Sciences. Beside subjectivity issues, some conditions of feasibility, relevance and confidentiality are, of course, also needed.

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

The main challenge is to provide a toolkit to analyse local tourism destination sustainability with coherent international guidelines.

The second challenge is to integrate the local scale set of indicators with the national level SF-MST in a double sense. First, local destinations account for a relevant share of national aggregates in several tourism indicators (eg. energy consumption of tourism, employment). Second, information on local destinations like the working conditions, the traffic congestion or attitudes against tourism by local communities in certain destinations should be somehow integrated in a national approach to tourism.

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?

It is important to use international standards as a starting point to analyse the sustainability of tourism trying to converge with UN useful initiatives. Nevertheless the set of indicators related to UN SDGs is still not well developed and it is not adapted to tourism attributes. Therefore, UN DDGs are not sufficient. It should be better to develop SF-MST in parallel but independently to UN SDGs. SF-MST, as a particular case, must develop beyond UN SDGs which have a more general approach.

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

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?

The main barrier for the development of indicators is related with governance. Statistical skills and policy capacity lies on the national or regional governmental scales while most tourism sustainability issues have a local nature. The problem of the lack of use of indicators in decision making processes is also related with governance. As a rule of thumb, the more democratic, educated and wealthy, the more the use of indicators for decision making.

7. Other comments

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

Any additional comments you may need related with my answers or other topics, I will be delighted to support you with my ideas.