

DETAILS

Overall:

- Links to the discussions of INSTO are missing (see attached outcome documents)
- Instead of always underlining the missing definitions, approaches etc. it should be highlighted WHY they have not been found so for when measuring sustainability in tourism and IF that is actually feasible.
- Alignment with other monitoring systems (e.g. GSTC)? – no reference made
- An overview of the selected accounts (issue areas) and the corresponding indicators would be good to provide in each section (economic, environmental and social) in order to see clearly what is going to be monitored.

1. Introduction

1.1. What is sustainable tourism?

- No chronological order (SDGs come after IY2017)
- Missing important milestones (e.g. A/RES/69/233 in 2014)
- Focus of content: why focus half a page on IY2017? It's not the international year that increased the awareness of the issue of monitoring sustainability but especially the SDGs, which should receive more attention in this chapter
- Specific tourism SDGs should be specified: 8.9; 12.b and 14.7.
- Clear problem statement is missing in the introduction: it needs to clearly highlight the reason why monitoring is so important of sustainability. The challenge for tourism stakeholders due to the remaining lack of evidence need to be highlighted as well as the challenges that come with the nature of sustainability due to its characteristics (intangible, future product etc.), its complexity, dynamism and interlinkages etc.
- The context-sensitivity and the related issues with that need to be referred to when talking about lack of evidence and reasoning.

1.2. Statistical Approach to measuring sustainable tourism

- Missing reasoning for monitoring: lack of evidence for better decision making for tourism stakeholders...
- Why differentiate between sustainability and sustainable development?
- P.11: There are broadly agreed concepts of sustainability. What determines a particular activity as sustainable CANNOT be perfectly agreed on universally because of....
- P. 11: the three broad approaches to assess sustainability in tourism should not be presented as something separate but rather as complementing
- P.13 needs references for the figures
- P-14 needs to clarify that before the indicator book there was an important publication by UNWTO called 'what tourism managers need to know' that was the first that reflected on indicators. This was then followed by the 2004 publication which was based on global consultation, providing over 700 possible indicators for relevant issue areas.
- P.14 reference to INSTO and UNWTOs commitment to support destinations at the local level should be made here (as this is ongoing since 2004)

Chapter 1.3.4

- P.21 it is good that the importance of the destination level is now acknowledged in this initiative, however, it also underlines its challenge as efforts for integrating e.g. economic and environmental accounts will be realized at a national level.
- P.21 when talking about spatial scale, the project would benefit from using wording used in spatial planning and referencing different levels of granularity and the related problems in measurement as shown by different research initiatives.

- P.22 tourism destination: when talking about the local level (city or rural) it needs to be kept in mind that that tourism may not be distributed throughout the entire administrative units, but instead often covers only parts of one or several administrative units.

Chapter 1.3.5

- P.22 SF-MST accounts: wording needs to be consistent to the one already used on page 17 to avoid confusion

Chapter 1.3.6

- Combined presentations and indicators reflect the same idea as composite/weighted indexes –why giving it a new name here, adding to the confusion? Need for alignment with already existing terms

1.4. Implementation and application of the SF-MST

In the first paragraph, the main issue of MST is clearly described: the project seeks to find a common, internationally comparable framework; yet, countries will adopt flexible and modular approaches, not implementing the possible parts at the same time, the same order and at different levels. In addition, the framework is not mandatory.

Considering these aspects while also understanding that now the destination level is included into the framework, hence making the success of MST not only depend on the national efforts but also local efforts, it presents a very ambitious project that may not be possible to be implemented in the way it is currently planned (also considering time, financial and capacity issues). Clarification the realistic timeframe of such a progressive and modular approach is required. The organization cannot promise a comparable framework if it will take decades for countries to arrive at a certain point of coherence (expectation management).

Finally, after describing the role of national statistical offices, this chapter would also benefit from adding a section on the use of non-traditional data and how or if it will be integrated into the initiative. Until this chapter, there is no information on HOW data will be collected.

Chapter 2 – Economic Dimension

- Link to the previously presented MST accounts on p.23 is missing (consistency).

Chapter 2.3.2 (p.32)

- Business surveys and visitor surveys are presented as the typical way to collect data on tourism industries though the TSA.

Chapter 2.3.3 (p.33)

- When talking about taking stock of assets such as airports, ports, hotels etc. we are talking about making an inventory of the assets that the destinations encompass. From the INSTO experience, this is already a great challenge for destinations and not done in a common way. In addition, new data sources and tools (e.g. remote sensing) are increasingly offering good solutions to encounter this challenge. Common wording and reflection about current developments and new possibilities to ensure data availability need to be considered.

Chapter 2.3.5

- Besides the various challenges that the initiative already has to encounter, it is unclear why a commitment is now also sought to measure the sharing economy. In order to provide reliable data in a responsible manner, it will require diving into exercises with non-traditional data, which is currently not included in the project. Finding a standard way on how to measure the percentage of shared accommodations can (similar to providing better guidance on establishing reliable and updated inventories) be an individual project on its own and should not be taken onboard just because it is a trending topic without

considering the needed discussions, research and data. Measuring sharing economy is a new addition to this initiative which could already be an individual project itself. To align with already existing terminology should it not be something like 'non-commercial or privately-owned' or 'shared' accommodation instead of 'sharing economy'?

Chapter 2.3.6

- p.34 eco-tourism should not be presented as the reference type of tourism for sustainable development as it is just one of many. Also, it is difficult to identify which establishments serve only 'eco-tourism' purposes due to the missing agreed definition

Chapter 3 – Environmental Dimension

- Would be good to include the reasoning why the four main accounts/issue areas were selected to be the focus in this initiative.
- There is a need to present the current data availability and the existing sources for the selected areas and their related indicators in order to understand the feasibility of measuring them. Much data is available outside of the sector, these sources should be considered.
- Aspects such as circularity and the element of the **displacement factor** are completely missing
- 3.4.1 uses different terms than used on page 36 (accounting for natural resources). Consistency needs to be improved to avoid confusion.
- P.54 first paragraph: UNWTO has previously used the term 'wildlife watching' instead of safari and focuses on non-consumptive part of it only, hence no recreational hunting and fishing. Consistency with UNWTO's previous work needs to be ensured.

Chapter 4 – Social Dimension

- P.64/65: the list of social issue areas is long and will include a variety of different indicators for each of these aspects. Similar to the work in the other areas, limiting the focus on the most essential will be key. Selection of priorities depends on data availability and used tools. Non-traditional techniques have especially helped in the area of local satisfaction (not perception!- stay aligned with commonly used terms) in recent years, which is why this topic will need to be integrated in the project. Hence clarification on which indicators is needed.
- Accessibility and use of infrastructure: unclear what 'roads, transport systems' mean and why this is now in the social dimension and not in the previously presented section on infrastructure.
- 4.6 (p.66): which are the four parts of the social dimension???

Chapter 5 – Defining spatial areas

- See general comment in the email & feedback on 1.3.4
- P.70: would be better to follow and align with terminology used by spatial planners. Usually, the municipal/city region reflects the local level and is referred to as such. Difference can then be made within the local level between urban areas/agglomerations and rural areas.
- Tourism destination (p.70/71): avoid sentences such as 'the concept of sustainability appears to be...'. The document should not be based on personal observations.