

**Strong points:**

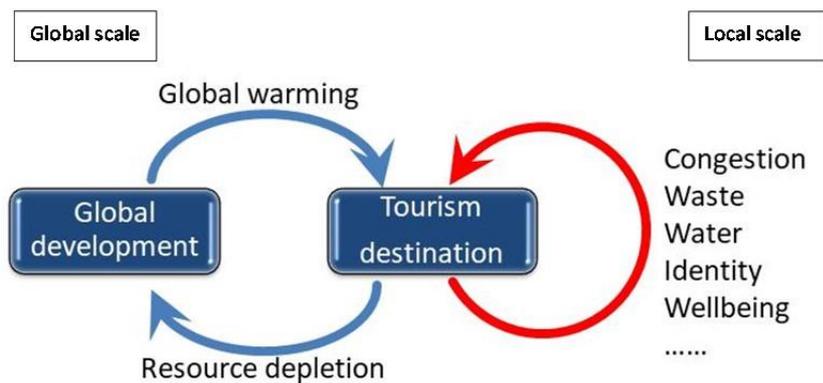
1. This draft supposes a great **advance** on the road to the final document.
2. The document follows a realistic approach looking for a balance between **relevance and feasibility**, including different scales of analysis.
3. It is an important issue to recognize the role of **national statistical offices** in the process, including establishing criteria for identifying the boundaries at the local scale. This process may be somehow similar to what national statistical offices have done to operationalize the concept of *usual environment*.
4. This realistic approach recognizes the **relevance of spatial scale and time** as two relevant aspects. Seasonality is strongly related to environmental issues. Therefore, yearly based statistics (or even quarterly) may not be appropriate in some cases. The scale dimension is considered throughout the paper, particularly in chapters 1 and 5 (not in the intermediate chapters dedicated to accounting).
5. The **policy-oriented approach** is very necessary as mentioned in the Draft.
6. To build a **statistical framework** is important if we want to provide credible numbers that can be compared with other sectors.
7. The document is **clear and readable**. The use of figures is in this sense very useful. Even more figures should be used to communicate the message to tourism stakeholders.
8. The **5<sup>th</sup> section on “defining spatial areas”** includes most of the issues that emerge from MST at the local level, what definitely enriches the document.

**Critical insights and suggestions**

1. **As the document assumes the relevance of a policy-oriented focus, a clear reference to the sustainability problems we are dealing with should be made explicit at the beginning.** This is very important because of proposed balance between relevance and feasibility. To clarify the problem demanding policy intervention, two main sources should be followed. First, the SDGs of the UN should be a main reference. To this respect, a strong link between the content of the document and SDGs is not still observed throughout the paper. The second main source of information for identifying the problem that is being addressed in MST should be the tourists and stakeholders of the industry, including local populations. In this respect, there is at least one specific tourism problem that should be considered. As the recently released IPK report for ITB Berlin 2018 states: “around 25% of all international tourists had the feeling that their destination had been “overcrowded” this year, according to a special World Travel Monitor® representative survey of 29,000 international travelers in 24 countries in Europe, Asia and the Americas conducted in September 2017”. At the same time, reactions of local population in the destinations against tourists or the tourist industry are becoming common, as a signal that the impact of tourism concentration in certain spots can endanger sustainability if there is not a sound management of the destinations.
2. The six spatial scales are a good starting point for the analysis, but not all them are equally useful or relevant in MST. Anyway, **it is important to distinguish between the spatial scale of the subject of analysis and the spatial scale of the object of the analysis.** It is clear that because of the expertise, the availability of data, the financial resources and to guarantee coherence and comparability, the national statistical offices should play a central role in MST. Nevertheless, there is a consensus that as an object of analysis for sustainability issues the national scale is not

so relevant. To decide which is the most interesting scale of analysis for MST we should go back to the policy-problems mentioned. There is a clear global sustainability problem to face (climate change, depletion of resources, world heritage conservation, etc.) and there are local problems to deal with, as tourism activity is highly spatially concentrated (congestion, effects of global warming, scarcity of water or energy, sewage, labour conditions, quality of life, etc.). This means that these two scales should be focused as the object of analysis. The local scale of analysis takes into consideration the most genuine characteristic of tourism, the tendency of tourism destination to sooner or later put in danger their own sustainability. Attractive places tend to lose attraction when demand provokes crowding and congestion. The relevance of the global and local scales as an object of analysis is outlined in the figure.

**Figure 1. Local and global scale in measuring sustainable tourism**



3. Spatial scales influence on all the rest of the analysis, particularly the economic, environmental and sociocultural accounting sections. Therefore, it is suggested that **the chapter on “Defining spatial areas...” is presented before the chapters related to the accounting** of sustainable tourism. The chapters devoted to the accounting of the three dimensions include the existing accounting tools to provide statistics for such dimensions, particularly at the national scale, but is not integrated with several critical questions raised in the introduction and in the chapter related with spatial scales.
4. **The scale of analysis is relevant from the point of view of feasibility.** If we are interested in global sustainability it is a realistic way to build a “national statistical framework for MST”, that can provide information that could be internationally aggregated to obtain an approximation to global scale. At the same time, this national statistical framework can contain some information to help to identify and analyse tourism sustainability at the local level, but this information would not be relevant enough at this local scale, because the lack of detail and due also local sustainability issues are very heterogeneous among destinations in a country. When we want to analyse local problems there is a diversity of situations and a lack of resources (what makes impossible to use a complete statistical framework).
5. The major challenge of MST initiative should be integrating and looking **for consistency between the local destination statistical information on sustainability (tables and indicators) with the national sustainable tourism accounts.** This would be a way of improving the quality, the credibility and the usefulness of the entire statistical framework. For the national sustainable tourism accounts, it is an opportunity, of having a spatial distribution, given that it is common that only a few dozens of destinations may account for the majority of tourism activity. It seems clear that at the local level some indicators related to the national accounting framework would be needed, along with a set of common indicators for local destinations. Local destinations

should be integrated into the MST analysis through the following figure where the tourism industry and the tourist consumption both at “identified” local destinations (and in the rest of the country) affect and are influenced by global sustainability. At the same time it is necessary to recognize and consider the tendency of tourism destinations to follow a cycle that finishes with stagnation or decline, following Butler (1980) model, in other words, destinations have often the tendency to put in danger their own sustainability.

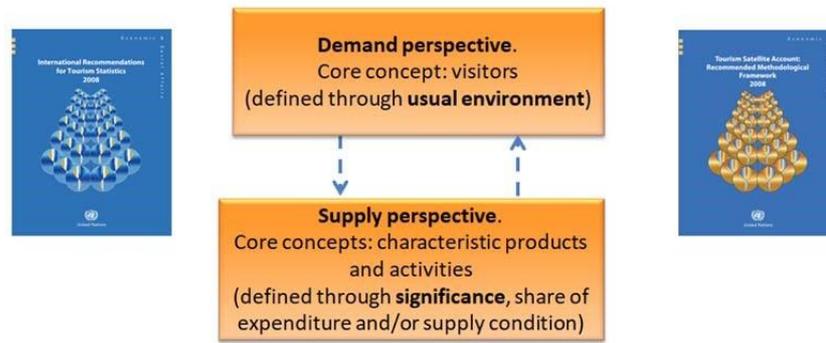
**Figure 2. Integrating local destinations within a supply and demand country scale approach to MST**



6. **Feasibility suggests that the local scale should be considered in a very specific way.** The local scale in tourism should not be approached through the division of the territory into myriads of tiny areas. By contrast, every country should identify its local destinations following relevance and feasibility conditions, with the help of some criteria internationally defined of significance (see later). It is very important to note that most of the territory of a country lies outside local destinations but it is probably that a relevant share of the tourism industry and a relevant share of visitors are concentrated in these places. A relevant share of tourism sustainability issues may be related to these particular areas. This way of approaching the local scale has the advantage of being able to provide comparisons between local tourism areas but has the difficulty of obtaining an aggregation of the figures for the next spatial scale.
7. **Feasibility suggests that the local scale (destinations) should be analysed through several indicators included in tables, that should be consistent with the national scale base accounts, but base accounts cannot be applied in a local scale context.**
8. **Aggregation of spatial scales is not a straightforward process.** This is due to both the availability of information and for methodological reasons. For example, air purity, working conditions or quality of the water of beaches, are local indicators that cannot be easily aggregated in a country. At the same time, this means that the statistical framework can work at the national (or even regional scale), but not in a local context. In a local context, an additional set of indicators is needed. Qualitative indicators obtained through surveys should be relevant at the local level. But again, these figures should be consistent with national values.
9. **Demand perspective, supply perspective and the need of a new dimension (the territorial perspective).** This complementary dimension requires the extension of the present statistical framework for tourism statistics (2008 IRTS & 2008 TSA: RMF). One of the most important

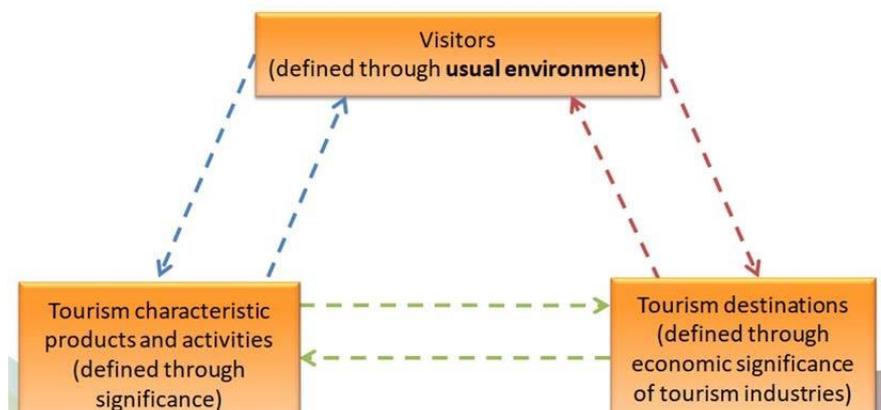
methodological contributions of the existing statistical framework for tourism is to distinguish between the supply perspective and the demand perspective. The Statistical Framework for MST document does not clarify enough this point, i.e. we are not always completely aware if our object of analysis is just the tourism industry, or it is the activities of visitors (consumption of both tourism products and non-tourism products). Nevertheless, to fully integrate the national and the local scale with coherence and consistency we need to define the concept of destination. Beginning with the existing methodological framework shown in next figure.

**Figure 3. Existing conceptual perspectives in tourism statistics**



...we can build an extended framework. This extended framework would include a new leg, the tourism destination, defined through the economic significance from both a supply and a demand perspective (INRouTe, 2017). Visitors are defined as known, by the concept of usual environment. Tourism characteristic products (activities) are defined through their ratio in tourism consumption and through their dependency on tourists. Tourism destinations could be integrated into this existing account framework through the concept of economic significance of tourism activities. This is because a large share of tourism characteristic products (activities) are produced in the destinations and at the same time a large share of the production and consumption of tourism products (activities) is consumed in the destinations. By analogy, a large share of destination production is oriented to visitors and a large share of visitor consumption takes place in the destinations. The next figure outlines this extended framework (more detailed in the Annex).

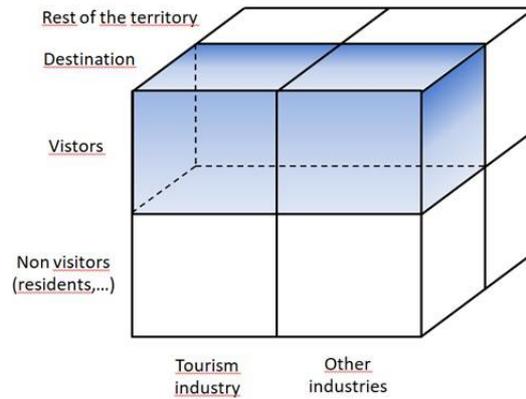
**Figure 4. Integrating the territory in tourism statistics**



The main consequence of this new framework is that now tourism sustainability at the local destination can follow:

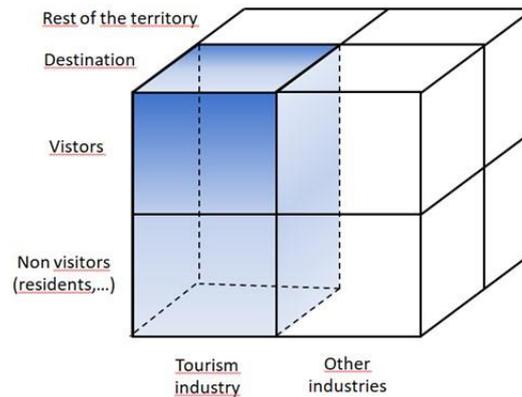
a) Destination demand perspective (analysing tourist behavior).

**Figure 5. Destination demand perspective**



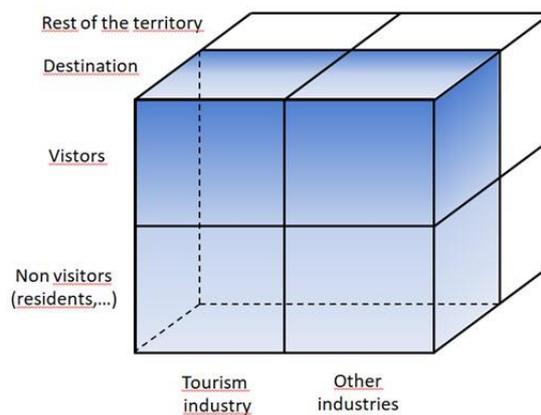
b) Destination supply perspective (analyzing only the tourism industry)

**Figure 6. Destination supply perspective**



c) Integrated destination perspective (analysing all the dimensions of sustainability in a place with high concentration of tourists and tourism activities but including also the impacts of the non-visitors and the noncharacteristic activities).

**Figure 7. Integrated destination perspective (supply + demand)**



10. Dealing with local destinations requires following an **enhanced perspective** to consider that **tourism is entangled at the local destination with other economic activities and with local population**. Analysing sustainability at the local level requires a new perspective as the sustainability of tourism in a local place is dependent on the sustainability of the area (including local population) as much as on the sustainability of the main activity

The suggestion is to consider the implications of this extended framework including its integration with the national statistical framework for MST in chapters 2 to 4 of the document.

P.S. We are building a “Statistical framework for sustainable tourism” without a complete framework for sustainable development. That is really complex!

**Annex: an extended framework for tourism statistics integrating the local scale**

