Comments to:

Statistical Framework for Measuring the Sustainability of Tourism

Consultation Draft

Draft prepared for initial round of consultation with the UNWTO Committee on Tourism Statistics and the Working Group of Experts on Measuring the Sustainability of Tourism

December 2018
Comments received and included here:

- **From countries**
  - Miriam Blumers (Federal Statistical Office of Germany)
  - Mini Prasannakumar (Director, Ministry of Tourism, India)
  - Raúl Figueroa (INEGI, Mexico)
  - Leonel Matsumane (Mozambique)
  - Patricia Seguro (Turismo de Portugal)
  - Faisal A. Al-Sleemi (SCTH, Saudi Arabia)
  - Fernando Cortina (INE, Spain)
  - Nancy Steinbach (Statistics Sweden)
  - Víctor Sosa Echevarría (Director de Investigación y Estadística, Ministerio de Turismo del Uruguay)

- **From Organisations**
  - Mahbubul Alam (Betty and Gordon Moore Center for Science, Conservation International)
  - Debora Tonazzini (Ecounion)
  - Antonio Massieu (InRouTe)
  - Inmaculada Gallego Galán (Sistema de Análisis y Estadística del Turismo de anadalucía (SAETA), Junta de Andalucía)
  - Ana Moniche (Sistema de Análisis y Estadística del Turismo de anadalucía (SAETA), Junta de Andalucía)
  - Nour Barnat (UNCTAD)
  - Raúl Hernández Martín (Director de la Cátedra de Turismo, CajaCanarias-Ashotel-Universidad de La Laguna)
  - Mr. Dirk Glaesser (Director, Department of Sustainable Development of Tourism, UNWTO)
  - Dale Honeck (WTO)

Due the extension and structure, see complete online documents for these comments:

- Peter Laimer (Statistics Austria)
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?

It might be helpful to give a brief definition of “tourism” itself. “Tourism is a social, cultural and economic phenomenon related to the movement of people to places outside their usual place of residence, pleasure being the usual motivation.” (UN 2010, p.1)

The part on page 10 does not fit under the heading “What is sustainable tourism”. The part from “The ongoing interest in sustainable tourism” to “In broad terms, these milestone achievements highlighted the need to integrate advances for people, planet, prosperity, peace and partnerships.” would fit better under 1.2.3 “a history of measuring tourism."

The following part about the SDGs is about the objective of the SF-MST. It might be useful to add a heading “Objective of measuring sustainable tourism” or “Policy context”. However, all in all, the introduction is quite long (31% of the entire document) and the structure is partly not consistent: 1. Introduction, 1.3. Overview of the SF-MST, 1.3.1 Introduction.

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?

Yes. While an overall accounting approach to all three dimensions would be desirable from a conceptual point of view, the approach taken in the SF-MST is pragmatic given the availability of concepts and data.

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

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

Yes. However, the interplay with the endeavours to put together a set of indicators (carried out by the SDG sub group) is still unclear. Will this set of indicators – once defined - be included in the SF-MST? If yes, will it be used as an example or as a core set of indicators?

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

Throughout the SF-MST useful extensions are often outlined. Here the further process of the framework is unclear i.e. are these extensions meant to indicate future developments of the SF-MST? Or is the intention to point out interesting additional points to be considered when implementing SF-MST?

In general, we would consider identifying a core set from the abundant possibilities outlined within the SF-MST as very fruitful (while certainly being a challenging task).
We suggest including a sub-chapter on the concepts (i.e. territorial and residence principle) used in the SF-MST. Mr. Cesare Costantino elaborates on this topic in his paper “The demand perspective in measuring the sustainability of tourism with specific focus on environmental aspects” presented at the last Meeting of the Working Group of Experts on MST.

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?

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

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?

In addition to the accounting for tourism related environmental assets and their use, it would be reasonable to involve the supply side. Accounting for tourism related environmental protection expenditure and the supply of environmental goods and services should be considered. To that effect, chapter 3.5 needs to be developed further.

Furthermore, we wonder why material flows are not considered.

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

Yes. However, certain knowledge of SEEA is needed and useful. It is understandable that the complex interrelations cannot be addressed in depth within the SF-MST.

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

Tourism benefits from services of ecosystems. Ecosystems provide space and landscape features, enabling people to enjoy landscape views or undertake activities such as hiking (recreation benefits). The service usually involves investments in the ecosystems (e.g. for building walking trails).

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

In general, the availability of data and the disaggregation of data will be the most challenging part.
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?

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?

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

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?

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

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?

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

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?

   *The SDGs certainly are a good occasion for determining a set of indicators on the sustainability of tourism and also a good reference framework.*

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

   *In our understanding such a set of indicators should cover all three dimensions of sustainability in a rather balanced way. With regards to the indicators we suggest a pragmatic approach based on SF-MST and already existing standards, concepts and methods.*

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?

7. Other comments

7.1. Do you have any other comments on the SF-MST at this stage?
Mini Prasannakumar (Director, Ministry of Tourism, India)

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?

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?

   **Comments:** There is need for specific measurable indicators.

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

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

   **Comments:** There is need for specific measurable indicators.

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

   **Comments/Views:** No specific comments.

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?

   **Comments/Views:** Employment opportunities, job security, adequate representation of local people in employment in tourism industry and safe working environment may be considered as key aspects concerning employment in measuring sustainability of tourism.

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

   **Comments/Views:** Adequate earnings and productive work, job security, equal opportunity and remuneration, social dialogue and representation, etc. may be treated as the important aspects of decent works.

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

   **Comments/Views:** Employment in tourism industry involves a disproportionately high degree of employers/owners/proprietors, as well as own-account workers (self-employed) i.e. those who work on contractual basis for a specified period of time with no formal employer employee relationship. Information on these entities is usually difficult to obtain and, from the employer’s point of view, they are considered an intermediate cost, and not as part of labourers. People come to tourism with varied backgrounds and professional educations and leave it for a range of other economic
activities. In view of these reasons, it is difficult to collect income, compensation, hours of work of persons employed and their conditions of work in the tourism sector from any administrative record.

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?

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

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

**Comments/Views:** Tourism is fully dependent on the natural resources of a destination like: wildlife, beaches, mountains, lakes, coastal zones, dunes, mangroves, rivers, estuaries, forests, wetlands etc. Without these natural resources, tourism does not exist in any destination. Man-made attractions have generally little to do with creating interest in visitors. Therefore, it is necessary to record and measure the current composition and changes in tourism related ecosystem assets for measuring the flows of ecosystem services so as to enable the policy makers to frame adequate policies to preserve the assets in a sustainable manner. Therefore, the ecosystem accounting approaches stipulated in the SF-MST, is relevant for measuring the impact of tourism on these ecosystems. iv. In practice, what do you see as the main challenges in collecting environmental data in relation to tourism activity?

**Comments/Views:** Collection of data related to the environmental assets, its changes over time, measuring the condition of these assets over time etc. Is a tedious job. Demarcation of the flows of ecosystem services to different users, including visitors, permanent residents of the area and others would be a difficult task.

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?

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

**Comments/Views:** Host communities perspectives are to be considered as the most important aspect in assessing the social dimension of sustainable tourism.

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?

**Comments/Views:** The selected indicators (social connections and networks, community and individual levels of trust / tolerance, civic engagement and participation in Institutions and governance, corruption, subjective well-being etc of host communities and visitors)are sufficient to measure the social capital. However, it is very difficult to Collect data. Limited indicators are sufficient, instead of defining more indicators with non-availability /difficulty in collecting related data.

4.4. In practice, what do you see as the main challenges in collecting social data in relation to tourism activity?
Comments/Views: Collection of data on different aspects of social dimensions itself is very tedious. Moreover, bifurcation of these data as a consequence of tourism and non-tourism activity is a much more difficult task. Overlapping cannot be ignored.

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 labeling of these levels suitable?

Comments/Views: Labeling are suitable which cover all segments of spatial area. However, within national, country specific sub national spatial area may be decided by respective economies.

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

Comments/Views: Administrative unit may be kept as first sub national level for comparison purpose. Within sub national level, visitor concentration may be the basis for further spatial bifurcation.

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?

Comments/Views: Since the measurement is for sustainability of tourism, spatial area is to be selected according to the tourism importance. Therefore, the proposed approach is appropriate.

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

Comments/Views: There are some data that may seem relatively non-spatial in nature. For example, visitor perceptions, migrant labour movements and climate change indicators. Therefore the different spatial areas may be considered for different dimensions like economic, social and environmental according to the availability of data.

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?

Comments/Views: Yes. However, non availability of data, difficulty in collecting available data, and non availability of proper methodology for measurement of the indicators are the constraints.

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

Comments/Views: Impact of tourism on Economical, social and ecological aspects are to be considered as priority themes.

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?

Comments/Views: Non-availability of data, difficulty in collecting available data, and non-availability of proper methodology for measurement of the indicators are the constraints. The methodology for measuring Sustainable Tourism should be focused on administrative data rather than Survey based data. Hence the indicators should be
chosen in such a way that they are available from administrative records. It would be difficult for a country like India to collect various data through surveys especially related to social and environmental dimensions of tourism on annual basis. The surveys would be very costly and time consuming.

7. Other comments

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

Comments/Views: The methodology for measuring Sustainable Tourism should be focused on administrative data rather than Survey based data. Hence the indicators should be chosen in such a way that they are available from administrative records. It would be difficult for a country like India to collect various data through surveys especially related to social and environmental dimensions of tourism on annual basis. The surveys would be very costly and time consuming.
Raúl Figueroa (INEGI, Mexico)

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?

The introduction provides a very appropriate context for the measurement of sustainable tourism, however, it is recommended to provide a more in-depth explanation of the role of SF-MST within all that contextual and reference framework that is mentioned throughout the introduction.

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?

Yes, we are satisfied, because although we must see the sustainability of tourism as a single activity in which the different dimensions of tourism activity converge, the measurement of each of them is different, even from the definitions and basic concepts that are handled they are special of each dimension.

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

Considering that the SF-MST does not intend to repeat the RIET and the CST: RMC, in chapter number 2 it would be advisable not to focus so much on manuals related to CST. Likewise, in this chapter it could be added that the identification of tourist establishments with ecotourism operations can be done through the use of geographic maps, which could allow us to locate those establishments that are close to the Protected Natural Areas and make them production account. Regarding employment, we consider it appropriate to include green jobs in Mexico’s tourism activity in chapter 4.

Regarding chapter 3, it is intended that the measurement be made in physical units; however, as a complement, the measurement of monetary units can be suggested.

In relation to chapter 4, reference is made to employment, as in chapter 2; considering it appropriate to be included only in this chapter. Likewise, it would be possible to include the production accounts that Mexico produces in the archaeological zones and in other zones or places considered as Cultural Heritage. In terms of population groups, it is very difficult to have such disaggregated information and also relate it to tourism activity.

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

We believe it is appropriate, however, that these combined tables can be completed as a result of the compilation of environmental information in Chapter 3.

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

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

Perhaps the most important and easy aspect to measure is decent employment linked to tourism activities.

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

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

The main challenges are the need to have a job survey that at this level of detail and also, that allows you to associate it with the tourism industries.

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?

Yes, although Mexico considers that the quantification of animal species is very difficult to have at a national level and it is much more complex to determine the part that is for tourist activities.

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

Yes, it is described it, however, emphasis should be placed on accompanying the experts in environmental economic accounts to ensure success in this connection.

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

It would be an important role, having well-identified tourist regions and that these are mutually exclusive. In the case of Mexico, many tourist destinations converge with each other and are not mutually exclusive, making it very complex to establish specific allocations to the tourist activity without duplicating and / or omitting some geographical areas of the country. Likewise, it must be considered that ecosystem accounts are not additive, just as satellite accounts are not.

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 the coordination with different institutions that generate environmental information and see in which units of measure they do it and under what temporality. In the case of Mexico, there are several institutions that collect environmental data and do so with different units of measure to those proposed in the SF-MST.

In the case of Mexico, the above is resolved through the creation of technical working groups, where all the institutions related to the sector are involved.
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?

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?

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

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?

*In general, we can say that levels are adequate; However, having information at all these levels is a pleasant challenge to face.*

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

*Each country must define which level should be its focus, since it is often subject to political issues and depending on the government in turn.*

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 long as tourist areas are well identified.*

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

*The challenges that Mexico identifies are budgetary to develop the projects, as well as the political aspects according to the government that is established in the country, as well as the interests of the rulers*

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?

*We consider them as good indicators, however, we must also consider the existing information and that UMWTO issues its opinion regarding its construction.*
Likewise, Mexico considers that they are sufficient and should go according to the development of the statistics of each country.

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 barriers are imposed by a political way in each of the countries, since based on the decisions of each acting government, it makes the budgetary allocation in the areas that they consider a priority.

7. Other comments

7.1. Do you have any other comments on the SF-MST at this stage?
Leonel Matsumane (Mozambique)

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?

R: For us Mozambique, the structure is clear but many times when you translate from English which is the official document language to Portuguese, it lose the context, so we suggest to share this in two languages (English and Spanish). We suggest also to include in the introduction the explanation of these three dimensions (Economic, Social and environmental) for better understanding of what we really are seeking to measure.

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?

R: The conceptual frameworks of MST satisfy us although it will challenge us to better organize ourselves in order to respond in appropriate manner these dimensions.

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

R: we think that out of these dimensions, we need political enforcement to have the leader engaged in MST. As we know, the MST structure requires involvement of other sectors out of tourism sector so, in this case becomes important to have any political-legal enforcement to have all other sectors engaged with this proposal.

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

R: is very important chapter as it provides an overview of what exactly we need to do to respond the three dimensions of MST.

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

R: no questions by now.

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

R: regarding the employment issues, it’s important to consider:
- Nationality (to assess job opportunity for local residents);
- Country of permanent residence (to measure in which extend we open opportunity for those foreigners who applied for other nationality);
• Gender (as one of the UN agenda is to promote gender equality especially in less developed countries).

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

*R: for us as a country in the concept of decent work, we consider as important issues discussed by the employment sub-group such as working hours, social security and formality. In our country seems like the jobs in tourism industry are not formal and based on this we do not consider people with appropriated skills to do their jobs in specific areas.

It’s very important to have the ministry of labour of each country engaged in formalization of different job areas of tourism sector (tourist guide, bar man, etc).

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

*R: special in Mozambique, the challenge on data collection regarding to employment in tourism industry is the registration of man power that each tourism business have. This lack of registration many times is related with low skilled people who in many cases are not aware of their employment rights resulting in job exploitation.

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?

*R: in our point of view, the most relevant are there.

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

*R: yes, it describes, but seems like we need to build awareness in people, managers and different players of tourism industry to have them engaged with environment preservation.

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

*R: the ecosystem accounting approaches described in chapter 3 is very important although it’s very difficult to assess the areas proposed in the methodology. The 3 categories proposed (regulation services, cultural services and procurement services) in ecosystem services approach, will be very hard to assess in a country like Mozambique where we have 2700Km of coast line and many people sustain their lives based on ecosystem resources.

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

*R: the main challenge is to measure the conception of the tourism sector in sector like water, energy, communication, controlled by other sectors.

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

R: the introductory text of chapter 4 on the social dimension covers all relevant aspects of this dimension. It’s important to notice that the 4 approaches proposed by the social sub-group complement and brings a clear understanding on what is expected from us.

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

R: when we look to social dimension, its important out of what the group discussed, the community ownership of the projects. Many projects comes in name of local communities but seems like there are imposed to accept what the foreign organizations want and can cause any social problem locally between the local leaders and their communities.

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?

R: the social dimension cover many aspects that can be different country by country, region to region or continent to continent but in our point of view the important aspects of the social dimension which can guarantee international comparability of data are included in this chapter

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

R: in case of Mozambique is very difficult to collect data on social issues as many of our communities are nomads. They depend mainly on the seasons of the years as they farmers. When there is a lack of region they migrate to other region with good conditions. In this case sometimes is difficult to measure local people employed in tourism projects.

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?

R: the proposed scales have to be adjusted according the common understanding. For us a regional scale it’s like group of country’s (RETOSA-regional Tourism Authority of southern Africa which includes Mozambique, Zimbabwe, Zambia, Malawi, Swaziland South Africa, and Angola). For administrative unity’s, we consider provinces or districts. For other levels we totally agree.

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

R: in our point of view, no.

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?
R: this approach is very common in different countries so, based on that we do not consider other approach.

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

R: for countries like Mozambique it’s a challenge to collect information on sub-national level as the communication between these two levels is very weak. The sub-national do not have people with appropriated skills to deals with statistics issues resulting many times in non-reliable statistics.

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?

R: Yes, in our point view the SDGs 8, 10 and 14 are very representative in terms dimensions to measure the sustainable tourism if when look to its specific goals (8.9, 12.b, and 14.7)

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

R: the priority themes on this indicator are:

- 8.9.1. contribution of Tourism to GDP;
- 8.9.2. Number of employment’s (divided by gender);
- 12.b.1. Number of tourism strategy’s related to sustainability and action plans implemented as well.

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?

R: The one of the barriers that we see in case of Mozambique is that many of indicator that need to be putted in place to assess SDG are related to other sector out of tourism industry. To solve this problem, we need more coordination internally and build awareness to have all other institutions engaged with SDG.

7. Other comments

7.1. Do you have any other comments on the SF-MST at this stage?
**Patrícia Seguro (Turismo de Portugal)**

**Disclaimer:** The following comments are constrained to the Portuguese experience in compiling the following satellite accounts: tourism satellite account (TSA), the Environmental goods and services sector (EGSS) account, the Environmental protection expenditure accounts (EPEA), environmentally related taxes and fees, Physical energy flow accounts (PEFA), Air emissions accounts (AEA) and economy-wide Material flow account (EW-MFA). Portugal does not compile the Water flow account neither the Solid waste account.

**Comments on Chapter 2 - Accounting for the economic dimension**

**2.3.2 Accounting for characteristics of tourism industries**

It is important to stress the idea that being tourism a “demand side activity”, whenever tourism characteristic activities are the reference (as potential productive agents of tourism, as in TSA Table 5-Production account) a broad concept of tourism is implicit.

Total demand from visitors is not produced exclusively by tourism characteristic activities and total production of tourism characteristic activities is not demanded by visitors. This is a “limitation” of the “tourism characteristic activities” approach, but, nonetheless, it is a fair approach since it sums up the core of tourism. Afterwards, if actual tourism production is to be considered, as TSA-Table 6- tourism ratios by activity will have to be considered.

To compile table 6, after the demand level is established, hypotheses have to be made to allocate the counterpart of tourism production across the several activities. This implies a first level of arbitrariness since, in fact, there is no data source about “which industries visitors go to”, only which products they buy. Taking the restaurant activity within the TSA as an example, there is no set of establishments/entities associated to tourism; only a certain amount of production is considered as touristic. Then choosing the “environmental” activities/companies among those will bring another level of arbitrariness. The use of a business register would not solve this issue.

**2.3.6 Extending the TSA to record environmental transactions and eco-tourism operations**

Within chapter 2, on the economic dimension, it is mentioned several times that an establishment approach of the TSA industries/tourism activities can solve part of the needs for the sustainability measurement and indicators.

If not the establishment level, the industry/activity/company level is, in fact, apparently, a way of merging tourism and environmental statistical standards and answer to the SF-MST information needs. This is true in what concerns the environmental transactions, at least those that are derived by industry and from a bottom-up approach, departing from the company/establishment information (as it is the case of those transactions related to payments of environmental taxes) and the physical flow accounts (energy flow and the GHG emissions).

In the case of the environmental transactions within the Environmental goods and services sector (EGSS) accounts, it is not expected that a significant number of entities from its universe falls under the tourism characteristic activities. Thus, even though the intersection of EGSS and TSA is possible in theory, in practice this intersection will probably be nearly empty.

Extending the TSA through the classification of eco-tourism operations will depend on the existence of information on those establishments/operations as, for instance, the existence of some kind of “environmental certification”.

Furthermore, the different level of detail of industry classification between the TSA and the environmental statistical standards is other potential issue. For instance, Accommodation and
Restaurants, within the environmental standards are always aggregated; also transports don’t refer only to passenger transport.

2.4 Measuring the employment aspects of tourism

Some notes:

Like Canada: from a measurement perspective, the employment aspect in sustainable tourism should be limited to employment in the tourism industries.

Green jobs: In Portugal “green jobs” are presently being assumed as the employment, measured as FTE, compiled within the EGSS account. It refers to the FTE associated with the EGSS production aggregate by NACE and environmental domain.

Comments on Chapter 3 - Accounting for the environmental dimension

3.3.4 Accounts for GHG emissions for tourism industries

Independently of the difficulty of the estimation, Households should also be mentioned as producers of GHFG emissions. The GHFG emissions account predicts households as “emissions’ suppliers” and the value refers almost entirely to “own transport”. In a tourism context, travels by car are significant. Also secondary houses are exclusively for tourism use (by convention within the TSA), so an amount of emissions related to accommodation service consumption of these houses would also be possible, in theory.

The reading and understanding of the absolute values of emissions estimated are somehow hermetic. The information would be more interesting if compared with the total economy: a percentage of emissions of the tourism activities would fit that purpose.

Page 31, footnote 13, the link is not working.

Comments on Chapter 6 - MST connections to sustainable development indicators

From our perspective, the UN SDGs are a useful framing for determining a set of indicators on the sustainability of tourism, since this is a complex issue, difficult to summarize in three indicators. Nevertheless, the existence of a worldwide framework is important for international comparisons.

The priority themes for the development of indicators are population (namely gentrification) and environment.

From a statistical point of view, the main barrier to the collection of data to derive indicators is the definition of sustainable tourism industries in statistical terms. What needs to be put in place to support the use of indicators in decision making processes is, besides the existence of resources to collect data and compile statistics, communication. TSA still has a complex language, difficult to communicate to general users and politicians.
I know the below paragraphs are more to theoretical, but I would like to share our point of view regarding “sustainable employment”

1. The MST initiative considers three dimensions of sustainability (economic, social and environmental), where employment is a key consideration of the social dimension.

“Human Capital” is of significant relevance in measuring the sustainability of tourism. “Decent Work” is very important but is a question of relativity, while “Green Jobs” is equally important but what about “Other than green jobs”. For employment sustainability, green and non-green jobs need to be considered together.

One way to increase the sustainability of employment is to help people improve their skills, so that they can progress from short-term, entry-level jobs to better jobs.

2. Employment aspect in measuring the sustainability of tourism

Regarding employment in the Saudi tourism industry, ‘food services’ sector accounts for the largest share of tourism-related employment, employing 48.7% of the total workforce in 2016 (1). It is important to note that the total output of a tourism-related industry (food and beverages services) usually exceeds consumption by visitors, as some of the output of the industry is purchased by non-visitors. For example, meals in restaurants, visitors’ purchases will usually account for a portion of the total number of meals produced. The output of food services will involve substantial sales to non-visitors. Hence, the total employment of tourism-characteristic industry does not necessarily equate to the employment generated by tourism demand. Therefore, it is necessary to use an allocator to approximate more closely the levels of employment generated by tourism sector. This is dealt by the use of the tourism ratio or the tourism value added industry ratio (2)

This method of using the tourism value-added industry ratios involves an assumption that the employment generated by tourism in each industry is in direct proportion to value-added generated by tourism (3)

The key challenge is, “How to achieve a continuous growth in sustainable tourism jobs, if there are skill shortages.

a. Green Jobs

ILO defines green job as one that provides decent work and that contributes to:
- Improving energy and raw materials efficiency
- Limiting green-house gas emissions
- Minimizing waste and pollution
- Protecting and restore ecosystems
- Supporting adaptation to the effects of climate change

Green jobs can be distinguished by their contribution to more environment-friendly processes. Tourism does not directly produce goods or services that benefit the environment, but a tourism job could follow a more environment-friendly process. A key issue is to identify a measurement baseline. Should we be measuring the impact of the job’s existence? If the existence of the job allows for a certain level of tourism activity, should the environmental impact of the tourism activity be considered when measuring how green the job is?

b. Human Capital (Availability of Skills and Experience)

This is vague. Should the focus be on whether the jobs contribute to the skills/experience of the person in the job, or should it be on how the level of skills and experience of those in a given occupation compare?
There is a European study that may illustrate a way to measure this. It was conducted by the European Centre for the Development of Vocational Training (CEDEFOP). That study examined skill levels across the entire labor force. It determined how many individuals had skills mismatches using four factors: underqualified, overqualified, under-utilized, and obsolete (skills).

c. Decent Work
Decent work is important but is a question of relativity. This concept is new for their application in the framework of the tourism industries.

3. For sustainable tourism employment, KSA's focus has been on issues related to the following:
   - Employment in urban, rural and coastal areas of the Kingdom’s tourism sector
   - Employment in the Kingdom by 13 provinces (regions) of the Kingdom
   - Employment by gender (male – female)
   - Aggregate employment

One of the objectives has been to achieve sustainable aggregate employment in the Kingdom. The main issues are related to their measurements.

4. Key issues in measuring employment in the context of sustainable tourism

An approach to the organization of data and the relevance of different concepts do differ between national and local scales, depending upon the stage of economic development, the relative contribution of tourism to the economy and tourism awareness at the national and local scales.

The data quality issue is there for Saudi Arabia, which needs to be resolved, but despite of all shortcomings, tourism employment statistics classified by 11 economic activities “Establishment Survey”, is published by the General Authority for Statistics. Currently, MAS Center of SCTH is the only Government agency publishing tourism statistics for the Kingdom.

Regarding the sustainability in tourism employment measurement, more efforts are needed to enhance the quality of statistics.

Available measurement frameworks, statistical standards, other references on tourism employment sustainability

- ILO, Guidelines concerning a statistical definition of employment in the environmental sector.
- UN, IRTS 2008 Compilation Guide.
From the INE of Spain we have no additional comments to those already expressed on other occasions.

Some of the questions are of a political nature and should be the ministries that contribute their analysis and needs.

Other questions are of a more general nature, especially those that refer to the collection of data, and in this case the main problems are those related to access to information, availability of data, access to administrative records, loading of information for informants, etc.

We would like to influence the need to define more precise indicators, in which the methodology for its calculation is clearly defined in order to establish comparisons at the international level.
Nancy Steinbach (Statistics Sweden)

I have looked through the chapters related to the SEEA and as it is still in early stages I can only provide some basic thoughts.

1. Chapter 2.3.6 about extending the TSA to record environmental transactions and eco-tourism operations. As you have a specific chapter 3 dedicated to the SEEA, perhaps this chapter 2.3.6 could be moved to chapter 3.5 and expanded upon? The SEEA describes the environmental goods and services sector and could use some additional thoughts on how to measure the eco-tourism part (so I’m hoping that your framework can help us improve our statistics).

2. Statistics Sweden has published a pilot study on the link between demand and SEEA, perhaps Cesare can find some of those results helpful: https://www.scb.se/contentassets/e5cd0bc363124d99a2c1b3cda18a8117/mi1301_2016a01_br_mi71br1802.pdf

3. About the asset accounts – I assume that GIS will be required to delimitate the areas of interest and a range of data sources to go with that. I would be beneficial if the chapter could describe this.
Víctor Sosa Echevarría (Director de Investigación y Estadística, Ministerio de Turismo del Uruguay)

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?

   R: The introduction is very good, it provides a general description of SF-MST, what are its purposes and its scope.

   I would simply make a modification when talking about what should be considered Sustainable Tourism, reference is made to Stable Employment, I think it would be necessary to add Stable and Decent Employment.

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?

   R: Completely satisfied, this facilitates interpretation and broadens the conceptual vision. Even anyone who isn’t related to the subject, could get a clear and general vision.

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

   R: The chapters cover the economic, environmental and social dimensions.

   Particularly in the case of the environmental dimension when establishing the measurement of the use of energy, the distinction in the table between renewable and non-renewable energy is important. In the case of Uruguay, 100% of the energy matrix is renewable and there is legislation that forces new constructions to use solar panels for certain services, with which the measurement of self-generated energy is important, although very difficult to cover.

   In this new version some of the observations made at the last meeting of the working group in October have been saved, but I believe that the methodology that harmonizes the measurement of the social dimension is still somewhat diffuse. This dimension has many fronts (vulnerabilities, culture, equity, gender, employment, etc.) and it is not easy to unify criteria for the different realities and levels of progress that each country has. I think we should reach a consensus on a minimum of parameters that this number should cheapen.

   In addition, there is no mention of a social problem in many countries that live on tourism, the sexual exploitation of children and adolescents. The need to eradicate “Sexual Tourism” should be visible if we want sustainable tourism.

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

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

R: Key aspects related to employment relevant to measuring the sustainability of tourism:
- Formality
- Temporary employment
- Training / Education
  - Gender Equity in activities
  - Number of employees with some disability.
  - Salary / Position / Gender
  - Medical losses
  - Number of workers hired / working hours
  - Quantity of Employment generated by the green investment.
  - Employment outsourced to companies dedicated to the care of the environment (recycling, renewable energies, etc.)

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

R: All aspects that are not associated with formality are difficult to measure. The training of employees, the link with the environmental part, the inclusion.

3. Measuring the environmental sustainability of tourism (this has already been answered)

3.1. Does the chapter on the environment dimension cover all of the relevant areas for the measuring the environmental sustainability of tourism?

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

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

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

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?

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?

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

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?

   **R. Yes it is**

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

   **R:** Perhaps the environmental dimension is more relevant at the Sub national level. Exite Protected Areas and Ecosystems that are easier to abolish from a subnational than national perspective.

   In the case of the evaluation of ecosystem services above all, they become more relevant if the context where the ecosystem is located is analyzed and the services it provides are closely related to a particular community. Social and economic dimensions tend to be more generalized and can be understood from a National perspective. Of course there are always different situations and in that sense it is that the possibility of a measurement at different levels is so important.

   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?

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

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?

   **R:** I believe that the UN SDGs are insufficient for a framework of tourism sustainability. We can not ignore that tourism is an industry that transcends a set of activities and that, therefore, sustainable tourism must be part of each of these activities. In addition to the characteristic activities of tourism there is a large network of activities that sustain tourism and that in turn tourism provides sustenance. It is one of the largest value chains that can be found in the economic activity and in each link of the chain value is added to the final product.

   For this product to be sustainable, each link must be sustainable.

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

   **R:** No comment
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?

R: No comment

7. **Other comments**

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

R: No comment. Simply congratulate for the result that is coming and thank everyone's efforts to obtain a document that will serve as a guide for all of us who work in the visualization of sustainable tourism.
This is a shaping up to be a great resource that not only provides guidance on measuring sustainable tourism but tries to integrate all recent developments and frameworks including experimental ecosystem accounting (SEEA EEA). I have just a couple of comments:

As an economist I found that monetary valuation has received little attention in this document, much less than it deserves. Economic valuation of cultural services in ecosystem services context has always been a big challenge. There are challenges in using mainstream economic principles, practices and methods (e.g. contingent valuation approaches or welfare-based measures) due to incompatibility with SNA principles. But that doesn't prevent us from developing/testing different options. This is true for both measuring tourism as an individual ecosystem service as well as as an ecosystem asset. For example, SEEA recommends on the use of net present value (NPV) of expected future flows to measure asset value. This is particularly powerful, as it goes beyond just reporting past and present of tourism indicators but actually tries to make future projections – which is the essence of sustainability that this document puts emphasis on. This also gives opportunities to think about making policies and development decisions in alternative scenarios.

The other comment I have is a suggestion to have an additional section on the analytical side and policy application. Measuring SF-MST is powerful. But this is not an end in and of itself. How all the data and information generated can be used for further analysis and how to provide policy support is the true strength of this whole work. Some methodological tools and analytical discussion to this end would be interesting.
Debora Tonazzini (Ecounion)

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?

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?

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

   *I think it is important to insert a distinction of indicators for the different geographical areas, especially for the coastal areas considering that:
   
   - Approximately 50 per cent of all international tourists travel to coastal areas (with high flows concentrated spatially and temporally). In some developing countries, notably Small Island Development States, tourism accounts for over 25 per cent of GDP.
   - More than 600 million people (around 10 per cent of the world’s population) live in coastal areas that are less than 10 meters above sea level. Nearly 2.4 billion people (about 40 per cent of the world’s population) live within 100 km (60 miles) of the coast.
   - Climate change, and the consequent geohydrological and coastal risk, will hit above all those areas that have a high anthropic vulnerability*

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

   *Yes, I think it is necessary a deepening on which indicators (main and optional) will be considered, as well as deepen the method of calculation and data available.*

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

   *I believe it is necessary to speed up and impose a TSA action bonds, which will stimulate and allow the deadline of 2020 to be maintained.*

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 subgroup 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**

   *Labour additions of Tourism Satellite Account (TSA) to understand the efficiency of the resources involved in employment and how to process inputs and outputs on decent jobs for the evaluation of green labour.*
- Working environment is a part of any green job assessment. Resource efficiency is important for local prosperity, for example in a rural context.
- A good starting point would be to link jobs in characteristic establishments of tourism, e.g., Hotel or restaurant. Much of the work to protect environmental resources that are important for tourism and used by tourists is outside tourism facilities, especially in the public sector, which has an important role to play in protecting natural resources.
- The employment aspects of sustainable tourism:
  - Definitions of work-related decency to be agreed / standardized
  - Access to basic rights such as sickness pay, social security - basic protection for employment.
  - Human capital \(\rightarrow\) the most problematic issues in terms of decent work include a measure of the appropriate use of a person's intellectual abilities
  - Must be considered references to local prosperity and economic development
  - Endogenous growth \(\rightarrow\) We do not want tourism-dependent economies to always be dependent on tourism (which requires more and more input from the outside to protect jobs and increase GDP). Some measures and practices are necessary to start defining green jobs, decent jobs. Some international classifications are needed to understand how to define green jobs, in order to start thinking about how to measure them.

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

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

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?

*Important to consider impact indicators on habitats, biodiversity and ecosystem services, but also the direct environmental impacts on the population, to what extent the pressures exerted by the tourist activity affect the local population.*

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

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

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

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?
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?

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

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?

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

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?

*I think we should also consider the geographical and target type criteria. As explained in the previous question 1.3, there are specific characteristics and problems to be analysed for different types of destinations and geographical areas. I think it is necessary to consider this, because in a series of generic indicators there may not be very important indicators for the different characteristics.*

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

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?

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?

7. **Other comments**

7.1. Do you have any other comments on the SF-MST at this stage?
Some suggestions regarding chapter 5

1. **Title**

   As far I understand it, this chapter “Defining spatial areas for the measurement of sustainable tourism” has the ambition to address a first statistical based reflection about the measurement of tourism at subnational levels; obviously a classification of territorial entities is a key issue to address but there are many others too (such as supporting key tourism stakeholders at different spatial scales providing the appropriate data they need, what are the main activities of visitors while at destination,… and a long etc.) Consequently, *Measuring the sustainability of tourism at subnational levels* sounds to me a more appropriate title.

2. **Main challenges regarding data collection**

   I would suggest that the new version of the Consultation Draft include a new paragraph referring to UNWTO provision of future technical assistance and capacity building support as well as guidance about statistical and non-statistical measurement at subnational levels.

   Also, last paragraph of Section 5.3 “The statistical challenge in defining spatial areas” / *The application of accounting principles* of the Consultation Draft could include a reference to the opportunity for setting up an articulated national / subnational set of statistical data regarding the main sources used for national tourism measurement.
Inmaculada Gallego (SAETA)

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.
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.

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).**_
Ana Moniche (SAETA)

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 us 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.

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**Comments more directly linked to the sub-national scale**

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,…
Nour Barnat (UNCTAD)

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?

   Yes! But in fact, we would be interested to learn how UNWTO define and especially, identify sustainable tourism industries.

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?

   Yes!

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

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

   Completely, and thanks for this. As Statistician, I can’t survive without indicators and guiding.

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

   Maybe concrete examples for developing countries especially for Least Developed countries. Data are missing, and a concrete work must be done.

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?

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

   In my opinion, first in some countries (developing) employment in tourism sector is not even collected, let alone more details. This is an opportunity guide country on collecting detailed data on the employment in tourism industries, and of course consider the informality. Why not work on a questionnaire to be implemented and tested in these countries.
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?

   *I think yes, at least it is a very good start.*

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

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

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

   *The identifications of the matter, the method applied (survey, administrative data,...?) and the financial aspect, especially for developing countries.*

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?

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?

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

   *The informal employment*

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?

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

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?

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

   *General comment: I am not sure that the purpose and the whole concept is enough clear for, again Least Developed Countries....where there are many challenges and lack of data everywhere.*
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?

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?

   I am repeating myself here, again the problem is big when we want to cover the developing countries (especially LDCs). The need, technology and tools available there are not the same as what we have in developed countries. We have to think in the appropriate way to deal with all their issues.

7. **Other comments**

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

   Just to say, thank you very much for the great work you are doing. Tourism is very important in many countries. Sustainability is needed everywhere. The good measurement of all aspects is the key. Thanks.
Raúl Hernández Martín (Director de la Cátedra de Turismo, CajaCanarias-Ashotel-Universidad de La Laguna)

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 interdisciplinary 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 designe 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 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.
Mr. Dirk Glaesser (Director, Department of Sustainable Development of Tourism, UNWTO)

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.
Dale Honeck, WTO

Here are some additional comments (together with those regarding the SDG tourism indicators I sent previously):

First, of the MST employment documents I like Igor's paper the most. I think the best approach is to use the ILO methodology to determine the number of green jobs, then estimate how many of those are related to tourism. In terms of measurable related indicators, I think that 1) The percentage of the country's tourism employees paid at or above the national minimum wage could be useful, together with 2) Whether the country concerned has signed the relevant ILO labour codes, 3) Whether the ILO codes are actually enforced in the country for the tourism sector and 4) Average years of education of tourism employees, preferably separated for management and non-management.

I’m surprised the MST draft does not yet refer to the UNWTO’s earlier work with the ILO, and the 2 documents which resulted [http://statistics.unwto.org/en/project/employment-and-decent-work-tourism-ilo-unwto-joint-project]. I believe a reference to these should definitely be included. Another relevant indicator could actually be 5) Country inclusion of Section 5 on employment in the UNWTO Compendium. A quick check of countries that have not included Section 5 in their 2018 UNWTO Compendium entry begins with Algeria, American Samoa, Andorra, Anguilla, Antigua and Barbuda, Armenia, Aruba, etc. …..

Finally, considering that tourism has always been promoted as a labour-intensive sector, I’m still amazed that so little effort is evidently made to collect adequate tourism employment statistics. As noted, a quick look at the UNWTO Tourism Compendium shows that employment stats are typically missing. I think this section of the MST text should clarify why these statistics are so important, and strongly urge tourism stakeholders to make much greater efforts. An analysis of why tourism employment stats are so often not collected should be included, together with examples and case studies of countries that have managed to overcome the problems.

Also, perhaps the UNWTO could work jointly with the ILO on training programs to improve/standardize tourism employment statistics collection, as well as to teach labour unions to lobby their governments to ensure the necessary survey work is actually completed.