

## **Views on Statistical Framework for Measuring Sustainable Tourism (SF-MST)**

### Structure

Overall, the structure of the framework is clear and comprehensive. At some points, links to tables or pursuing chapters are not correct and need to be revised at a final stage (e.g. p.20 link to chapter 6, which is chapter 5; p. 25 link to table 2 which is table 1 etc.).

Furthermore, the intention of chapter “1.5 Structure of the SF-MST” document is not clear.

### Approach

To base SF-MST on national accounting standards is beneficial and meaningful. The framework takes advantage of the common origin of the SEEA and the TSA which allows the environmental dimension of sustainable tourism to be coherently integrated with the economic dimension.

Even though the conceptual base is founded on existing statistics and accounting systems, the practical implementation is not straightforward. Practical challenges should be named and further practical assistance would be expedient. For example, the assets accounts are conceptually difficult. It would be problematic to distinguish between flows which are used by tourists and by residents.

In general, explanations on how the accounts will be compiled, data sources, compilation process etc. would be useful. Besides, a chart showing the interactions between the three dimensions economic, environmental and social would be helpful as well.

In particular, the exact formulation of the social dimension is not straightforward and the feasibility is currently questionable as in contrast to national and environmental accounts a “social accounting” does not exist in official statistics. A more explicit reference to the compilation would allow a better understanding.

### Interpretation of the results

In general, the framework and the corresponding results can/will be “exemplary” for countries with a top-down approach of National Accounts. This is due to the assumptions that would have to be made. As a consequence, interpretations and analyses of the results of the MST have the potential of misleading in terms of

- Increasing size dimension of effects
- Responsibility of sustainable tourism for specific effect (e.g. shift of sectors)

Thus, the robustness of the results needs to be examined closely over time. Furthermore, it is advisable to add a section in which information and examples on result interpretation for policy makers and other user without deeper statistical knowledge is provided.

### Spatial scale

It needs to be clarified if these accounts should be integrated in the economic, environmental and social dimension or if it is seen as a partial solution. Is the intention to set sustainable tourism of a region in relation to the one of the overall economy?

Recording the dimension at different spatial scales (regional, municipal or city-region, local) might not be feasible for many countries.