



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS  
STATISTICS DIVISION  
UNITED NATIONS



System of  
Environmental  
Economic  
Accounting

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## System of Environmental-Economic Accounting 2012 – Experimental Ecosystem Accounting Revision

### First Global Consultation on:

**Chapter 8: Principles of valuation for Ecosystem Accounting**

**Chapter 9: Accounting for ecosystem services in monetary terms**

**Chapter 10: Accounting for ecosystem assets in monetary terms**

**Chapter 11: Integrated and extended accounting for ecosystem services and  
assets**

### *Comments Form*

**Deadline for responses: 6 July 2020**

Send responses to: [seea@un.org](mailto:seea@un.org)

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Organization & country:	CBD

The comment form has been designed to facilitate the analysis of comments. There are twelve guiding questions in the form, please respond to the questions in the indicated boxes below. To submit responses please save this document and send it as an attachment to the following e-mail address: [seea@un.org](mailto:seea@un.org).

All documents can be also found on the SEEA EEA Revision website at:  
<https://seea.un.org/content/seea-experimental-ecosystem-accounting-revision>

In case you have any questions or have issues with accessing the documents, please contact us at [seea@un.org](mailto:seea@un.org)

### **Questions related to Chapter 8**

**Question 1: Do you have comments on the principles proposed to underpin monetary valuation for the revised SEEA EEA, including the use of exchange values and net present value approaches?**

I think that it is important to note at the beginning that it is not possible to capture the actual value of an ecosystem type – for example, we cannot put a value on oceans or rainforest, as if they disappear all life would also disappear. Thus while we are looking at the value of individual ecosystems, these cannot be aggregated at the global level to get a ‘global value’. Therefore, it is important to complement monetary valuation with a strong physical accounting.

I think that the discount rate should also be described in more detail – perhaps by giving an SNA example. Monetary valuation is highly sensitive to the discount rate and thus the valuation will vary greatly based on the chosen rate.

Additionally, there is almost no mention of biodiversity across the 4 chapters.

**Question 2. Do you have any suggestions for topics to include in Annex 8.1?**

Assets that cannot be valued. I think it may be necessary to a section under 4 to discuss assets that cannot be valued and what to do with them (or externalities that cannot be estimated). Additionally, I think that it might be useful to add some sort of a discussion at the end of this chapter which mentions that this approach is still something that is under development and that there is ongoing research on valuation.

**Question 3. Do you have any other comments on Chapter 8?**

Click here and start typing (The length of your response is not limited by this text box.)

### **Questions related to Chapter 9**

**Question 4. Do you have comments on the range of valuation methods proposed for use in estimating exchange values of ecosystem services?**

I think that it would be difficult to apply this framework to marine ecosystems as the benefit might not really be kept within national boundaries.

**Question 5. Do you have any other comments on Chapter 9?**

Again, I think that it is necessary to mention that the idea of replacement values or even valuation does not imply that ecosystems actually can be replaced – once it is lost it is lost and this includes all the biodiversity (and the value of biodiversity within ecosystems is very difficult to value as we cannot get it back and there might be implications that go beyond the locality as ecosystems are connected).

### **Questions related to Chapter 10**

**Question 6. Do you have comments on the definitions of entries for the ecosystem monetary asset account including ecosystem enhancement, ecosystem degradation and ecosystem conversions?**

I think greater explanation is needed. For example, measuring 'rocky shores' (one of the IUCN classes) would be extremely difficult and valuing it even more complicated. Perhaps it should be mentioned that this approach is not currently possible for all the IUCN classes. Additionally, I think that it may be useful to mention that satellite data and remote sensing are making the monitoring of these classes easier, but valuation still is a bit farther off.

**Question 7. Do you have comments on the recommendations concerning the selection of discount rates for use in NPV calculations in ecosystem accounting?**

Click here and start typing (The length of your response is not limited by this text box.)

**Question 8. Do you have comments on Annex 10.1 describing the derivation and decomposition of NPV?**

Click here and start typing (The length of your response is not limited by this text box.)

**Question 9. Do you have any other comments on Chapter 10?**

Click here and start typing (The length of your response is not limited by this text box.)

**Questions related to Chapter 11**

**Question 10. Do you have comments on the proposed structure of the extended balance sheet that integrates the monetary values of ecosystem and economic assets?**

no comments from me on this chapter. However, I think that overall, all the chapters should include warnings to the compilers that valuation data should not be used in isolation and while it is useful for informing economic policy there is a need to contextualise the information and provide underlying physical accounts – especially due to the number of assumptions that are made during the valuation process.

**Question 11. Do you have comments on the approaches to assigning the ownership of ecosystem assets that underpins the structure of the extended sequence of institutional sector accounts?**

Click here and start typing (The length of your response is not limited by this text box.)

**Question 12. Do you have any other comments on Chapter 11?**

Click here and start typing (The length of your response is not limited by this text box.)