



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION
UNITED NATIONS



System of
Environmental
Economic
Accounting

System of Environmental-Economic Accounting— Ecosystem Accounting

Global Consultation on the complete document: Comments Form

Deadline for responses: 30 November 2020

Send responses to: seea@un.org

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The comments form has been designed to facilitate the analysis of comments. There are six 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: seea@un.org.

All documents can be found on our website at: <https://seea.un.org/content/global-consultation-complete-draft>

In case you have any questions or have issues with accessing the documents, please contact us at seea@un.org

General comments

Question 1: Do you have comments on the overall draft of the SEEA Ecosystem Accounting?

The document is well written and clear. However, the chapters on valuation and monetary accounts seems still to require a lot of work before it can be called a statistical standard. We suggest that the document is split into two parts one with chapter 1-7 (with 1 and 2 adjusted accordingly). Part one (physical accounts) can then be adopted as a statistical standard, while part 2 (monetary accounts) could be subject to further development of a statistical framework with a clarification and a proper organization and classification of concepts and methods.

There is a very high degree of asymmetry between the chapters on physical accounts on one hand and the chapters on valuation and monetary accounts on the other.

The chapters on physical accounts seems much more elaborated and solid than the monetary. They appear as a coherent statistical framework with clear concepts and ideas for classifications. Although by design it is not an implementation guide, the reader is left with an impression that the step towards implementation is not that big. At the same time these chapters represent an open approach which invites to the inclusion of many different kinds of physical data, if they are relevant and useful for analysis.

In contrast, the chapters on monetary accounts are much more loose and have not made the same progress with regard to a statistical treatment of valuation concepts. At the same time they appear to be very narrow in its scope. The narrow focus on only one value concept, exchange values, which is furthermore counterfactual, seems not to be very sound. One could have hoped for a broader scope which could be useful for many types of economic analysis and policy uses.

Comments by sets of chapters

Question 2. Do you have comments on Chapters 1-2 of the draft SEEA Ecosystem Accounting?

In general fine, well written and clear.

'Statistical standard' is mentioned several times and appears as something important, but it is not explained what it means. That would probably be useful to do.

In e.g. 2.35 (and several other places) it is explained that the exchange value concept is chosen because it makes values comparable with the national accounts, and that for policy and analytical purposes other values have to be used. This is strange, and it prompts for an explanation of what the real use of the chosen exchange value concept then is. It is hardly convincing that it is chosen because it makes values comparable with the national accounts values. There must be some real analytical benefits of using this concept (in contrast to the other values described in chapter 12). What is the interpretation (e.g. "contribution to market values of other products", "We believe these values would apply if a market existed")?

Question 3. Do you have comments on Chapters 3-5 of the draft SEEA Ecosystem Accounting?

In general very well written and clear, however especially chapter 5 are complicated and could benefit from more explanation or a few examples. For instance, it would be useful with some real examples of variables in Table 5.3 instead of 'variable 1', 'variable 2', etc.

Section 3.5, e.g. para 3.79 – 3.80 is a good example of the open and inclusive approach used for the physical accounts, which encourages the creation of databases with many types of relevant data. It is mentioned that these data enriches the accounts.

Also, in chapter 4 it is mentioned that different data layers should be maintained, and in chapter 5 that variables and indicators are selected in relation to the context and purpose of assessment. Very good and very much in contrast to the monetary accounts where additional data are put aside in "complementary" accounts.

Question 4. Do you have comments on Chapters 6-7 of the draft SEEA Ecosystem Accounting?

Generally clear and well written.

Table 7.1.: are there any specific reason why the heading does not follow the conventional SUT format, including for instance terms like "output" and "intermediate consumption"?

Section 7.3.2 on measurement baselines would benefit from some more explanations. It is difficult to understand. How exactly are these baselines used in relation to the accounts? Examples?

Question 5. Do you have comments on Chapters 8-11 of the draft SEEA Ecosystem Accounting?

The chapters are well written, although we don't find that the content represents a statistical framework, or adds that much compared to what we had before, cf. SEEA 2003 and SEEA EEA, except that it has become much more narrow.

The concept of exchange values seems misplaced and counterfactual in relation to non-marketed ecosystem services. Although, on its own premises, the logic is clear it seems hypothetical and counterfactual, and furthermore unnecessary, since one could arrive at the same results directly by introducing simple conventions. It would appear more logic, if the term "exchange values" was removed and replaced by e.g. "accounting value", which actually is used in some parts of the text. Then focus could be on describing that for some purposes (strict alignment with SNA values) priority is given to choosing concepts and methods which represents an estimation of the contribution of the ecosystem services to marketed products, etc. Much of the text on exchange values could then be put in an annex.

Section 9.29 – 9.30, which, basically, explains that the market does not put any value on the ecosystems, points at a very important issue. But perhaps we do not need a SEEA accounting system to illustrate only that. It seems much more important to have a

statistical system, that can tell policy makers and analysts that even if market values are zero or low, there are other value concepts, that needs to be taken into account in order to manage the ecosystems properly.

A new quasi sector 'Ecosystem Trustee' is introduced. It seems odd to introduce such a hypothetical concept in a statistical standard, which are supposed to describe the real world. Could 'government' be used instead? May need some more explanation how this should/could be interpreted from a statistical view point.

Question 6. Do you have comments on Chapters 12-14 of the draft SEEA Ecosystem Accounting?

Generally clear and well written.

Chp.12 As indicated before it would be useful not to regard these "alternative" value concepts as something complementary. They should instead be build into a more comprehensive statistical approach to the description of values associated to ecosystems.

Instead of focusing on economic theory and the concept of welfare values a statistical approach dealing with what can be observed or estimated in the form of costs and wtp, (total, marginal, average) could be in focus. Then the use of different values for different types and analysis would follow naturally. Economic theories' interpretation of the values as related to welfare and preferences, etc., consumer surplus, etc. could be treated in an application chapter or an annex.

Chapter 13 and 14 are very useful, although perhaps more like applications.