



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?

- We highly appreciate progress made in SEEA EA and would like to congratulate the authors and the SEEA EEA/EA community for a substantial improvement and expansion of work.
- It might be useful to be upfront and perhaps more explicit about what SEEA EA cannot do. A subsection or at least a paragraph very early on (e.g. Section 1) on this might be useful for avoiding disappointment for some stakeholders. Nonetheless, in that same subsection it might be explained that it is precisely the harmonisation of data structures about ecosystems that would be facilitated by SEEA EA framework which might be used for different purposes that SEEA EA is not primarily aimed for.
- While some sections are relatively detailed and will be beyond capacities of statistical offices or even environmental agencies to collect and systematically account for all topics (for example, ecosystem condition), some other parts would benefit from more detailed explanation of accounts construction and type of data entering accounts. In several chapters, it has not been clear what is desirable or preferred accounting structure (essential) with regard to SEEA EEA and what can be done to further build on this.

Comments by sets of chapters

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

- Annex 1.2: Linking the SEEA EA and the SEEA Central Framework
A1.2"boundary is broader than that "-> "boundary is broader THAN that "
- Page 28, 2.56: Various classifications of values could be used. It is not clear why authors are operating with the concept of Total Economic Value when the accounting is quite constraint to exchange values. For example, one of the components of values can be bequest value or existence value, which are not captured in this framework.
- It is not clear what Figure 2.4. is meant to show and needs to be better explained if it is to be attained in the document. Where the four quadrants "Living as nature" etc. come from? The axis Instrumental vs Intrinsic/relation doesn't seem to be correct - from the definition intrinsic value is not in any way based on people, while relational values directly are – and in this figure we have the two together. In general, it is not clear what the figure aims to say and it is not based on an agreed typology.
- 2.60 "cantered" = "centered"?
- 2.61 We would change "This approach to monetary valuation.." to "Approach to monetary valuation based on exchange values is chosen.."

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

It would be beneficial to unify terminology concerning the structure of extent accounts. On page 63, “natural” expansion/regression in Table 4.1 is called “unmanaged” expansion/regression.

Page 39, Figure 3.3

For EA1 should be the type ET1 not EA1

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

- 6.6 “Together with information the extent” -> “Together with information ON the extent”

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

- 8.2. Revise “The availability of national accounts aligned monetary valuations can support:”. Also we would move “highlight the relevance of non-market ecosystem services” higher up in the list. Missing end bracket at “(e.g., air filtration;”
- 8.5 “the research and application on” -> “the research and application OF”
- In section 8 there is a reference to marginal changes and monetary valuation. Changes can be assessed in both quantitative as well as qualitative terms. In the latter case the extent of the change cannot easily be valued as a marginal or not. In such case how can monetary valuation be relevant or not? Guidelines should be clearer and detailed.
- 8.7. “Data on the physical flows of ecosystem services and on the extent and condition of ecosystem assets may support assessment of these other value perspectives.” reconsider into “Data on the physical flows of ecosystem services and on the extent and condition of ecosystem assets may support assessment of some value perspectives, while for other aspects of nature’s value (e.g. spiritual dimension) an accounting framework might be not suitable altogether.”
- 8.7. “When there is a requirement to analyse large, non-marginal changes, monetary” - maybe an example would be warranted.
- 8.11 reconsider re-writing as this paragraph is unclear and a bit messy. We would include as a second sentence “For some ecosystem services the difference between the two approaches might be substantial.” The next sentence should be carefully rethought and rewritten – non-use value is not an ecosystem service, for example.

- In section 9.8 it is not clear where the use of intermediate services should be recorded in the Use table and how double counting can be avoided.
- In section 9.16 it is mentioned that the location of users is not a requirement. Though in case of ES degradation and unsustainable use acknowledging the location of users is very much relevant for policy intervention.
- In relation to section 9.3.2 methods could also be categorised into two groups according to a. that the ES provision is within the SNA production boundaries and b. ES provision is not within the SNA production boundaries.
- 9.22 - there is a lot of work in environmental economics arguing that only final ecosystem services should be valued, hence perhaps more details and explanation might be warranted.
- 9.42-9.44 These is quite a bit of repetition and unclarity in these paragraphs, please revise carefully. (Travel cost data is not a method and hence should not be bolded, perhaps?)
- There is no discussion about the structure of the complementary accounting using monetary methods that are based on hypothetical markets (e.g. stated preferences). Since complementary accounts, for example, in welfare values might be of particular interest to policy makers, it would be useful to elaborate perhaps a bit more.
- 9.55 consider including mention that SPs can be particularly useful for estimating non-use values which might be of great interest to policy makers. in footnote 71 please consider explicitly stating that Johnston et al 2017 provide state-of-art guidance for SPs.
- 9.58 instead of “discrete choice methods” use “choice experiments” for consistency. The last sentence is a bit unfinished – for example, what “derive an appropriate value” means??
- The methods reported in sections 9.59 and 9.60 are described in a vague way and also seem not to be relevant with the monetary valuation objective.
- 9.66 Revise first sentence. Probably towards “Cost-based methods (the averting behaviour, replacement cost or the avoided damages methods) are the most commonly used methods for monetary valuation for regulating and maintenance service.”
- 9.5.1 Consider including value transfer in the title of the section
- 9.69 Consider making physical characteristics point as first, since this is likely to be the most important factor. Also consider including the following at the end of the ‘physical characteristics’ point: “It might also include different spatial configuration of the beneficiaries relative to the ecosystem which might alter the value of the service significantly (e.g. flood protection).”
- 9.69. “Changes in valuation” should probably be “Changes in values over time”.
- 9.73 “Research BY Kaul”
- Section 9.74 it would be very helpful to incorporate information about the available databases of valuation studies (e.g. <https://www.evri.ca/>).
- Section 9.5 doesn’t discuss the variation of economic valuation methods that a meta-regression analysis may entail. Such an analysis may mix values from price-based, cost-based as well as revealed and stated preferences values. It is

important that this is anticipated and accounted for in the econometric model of meta analysis.

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

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