



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS  
STATISTICS DIVISION  
UNITED NATIONS



System of  
Environmental  
Economic  
Accounting

---

## 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)**

Name:	Ivaylo Rangelov
Organization & country:	National Statistical Institute Bulgaria

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?**

Chapter 8 provides a summary of the core principles of monetary valuation that apply in the application of the national accounting concept of exchange value and net present value approaches.

BNSI has no comments on the presented principles proposed for monetary evaluation of EA and ES. The assessment in monetary terms (national currency or euro) for regulation services (air-quality regulation; climate regulation; water regulation; natural hazard and flood regulation) will be very difficult since these services are used indirectly and links to NA must be further described.

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

BNSI has no other suggestions at the current stage for other topics to be included in Annex 8.1: Exchange and welfare values in a national accounting context at this time.

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

BNSI has no other comments on Chapter 8.

### **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?**

BNSI has no additional comments to the presented techniques for valuing transactions in ecosystem services and valuation approaches for different ecosystem services presented in Chapter 9.

When generalizing the monetary exchange values from the ecosystem accounting areas it's very important that they are focused on those final ES services that have market price and similar markets (observed transaction prices) based on the first stage of biophysical quantification of the ES.

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

No other comments on Chapter 9.

### **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?**

In general, chapter 10 provide a good basis for the development of the ecosystem monetary asset account.

In our view the assessment of the monetary value in currency units between two accounting periods by categories ecosystem enhancement, ecosystem degradation and ecosystem conversions will be very difficult since EA are spatial areas with no clear links to national accounts. Also in table 10.1 the other changes in the volume of EA due to catastrophic losses is not feasible and more clarifications are needed for their monetary value assessment.

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

BNSI has no additional comments on the recommendations concerning the selection of discount rates for use in NPV calculations in ecosystem accounting.

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

No additional comments on Annex 10.1 describing the derivation and decomposition of NPV.

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

No other comments on Chapter 10.

## **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?**

BNSI has no comments at this moment on the proposed structure of the extended balance sheet that integrates the monetary values of ecosystem and economic assets. According to the presented structure, the ecosystem assets are part of environmental non-financial assets divided by type of ecosystem: terrestrial, freshwater and marine.

BNSI supports the proposed structure because it is focused on the most important non-financial assets – timber resources, cultivated biological resources, freshwater and marine aquatic biological resources that are the most important from the provisioning services from terrestrial and water ecosystems and have market price.

**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?**

No additional comments on the proposed approaches to assigning the ownership of ecosystem assets. BNSI agrees with the new term “ecosystem trustee” when an ecosystem asset supplies ecosystem services that contribute to non-SNA benefits (primarily regulating and maintenance services and cultural services), that part of the value of the asset will be considered to be owned by this new sub-sector of general government.

Nevertheless, in our view when producing supply accounts for ecosystem services, establishing the landowner (physical entity - household or legal entity – enterprises) is very important for allocating the services to the economic institutional sectors according to the current SNA. Establishing the landowners is very difficult task as the only geospatial data from State Cadastre does not include the owners of immovable properties and buildings and there are still missing unified technical specifications for the integration of existing geospatial information with administrative data sources and statistics for establishing the land owner of the ecosystem assets.

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

No other comments on Chapter 11 at this time.