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

First Global Consultation on:
Chapter 3: Spatial units for Ecosystem Accounting
Chapter 4: Accounting for Ecosystem Extent
Chapter 5: Accounting for Ecosystem Condition

Comments Form
Deadline for responses: 30 April 2020
Send responses to: seea@un.org

<table>
<thead>
<tr>
<th>Name:</th>
<th>James Brennan</th>
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<tbody>
<tr>
<td>Organization &amp; country:</td>
<td>Ducks Unlimited Canada, Canada</td>
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The comment form has been designed to facilitate the analysis of comments. There are nine 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.

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
As Canada’s leading wetland conservation organization, Ducks Unlimited Canada (DUC) recognizes the critical and fundamental importance of clearly defining mutually exclusive spatial units to delineate different ecosystems for the purposes of ecosystem accounting. While we are generally supportive of the draft definition and description of ecosystem assets outlined in Chapter 3, we have identified several wetland-related questions that we believe will need to be addressed in order to ensure clear and consistent global application of the proposed definitions and concepts in practice. These include:

- With regards to the definition of ecosystem assets, what constitutes contiguous spaces and at what scale threshold? For example, is a single small pothole wetland (less than 0.5 ha) in an agricultural field considered an ecosystem asset?
- How does this application of the definition change if there are numerous small wetlands (density 20-30/km²) embedded in agricultural or grassland landscapes? Is there a recommended basic spatial unit (BSU) and will it capture small, but numerous ecosystem assets?
- How will ecosystem assets be applied in landscapes characterized by multiple interconnected ecosystem types (e.g., bog, fen, swamp, marsh) that transition from one to another often via both large and small linear features?
- How will ecosystem assets that co-occur in a fairly fluid fashion, such as a river and riverine wetland, or a lake and associated coastal wetland, be accommodated? This could be particularly challenging where these occur in association with linear ecosystem assets as in the river/riverine wetland example.

Further, while we recognize that the purpose of the revision of the SEEA EEA is to provide a standardized global methodology for SEEA ecosystem accounting, we are concerned how the draft definition, description and associated delineation of ecosystem assets applies and integrates the vast spectrum of classifications for ecosystem type, land use and land cover that already exist throughout the world.

With respect to ecosystem asset areas, we agree with the principle that ecosystem areas should be mutually exclusive, both conceptually and geographically, so that ecosystem areas do not overlap and thus cannot be double-counted.

Question 2. Do you have any comments on the use of the IUCN Global Ecosystem Typology as the SEEA Ecosystem Type Reference Classification?
We believe that using the IUCN Global Ecosystem Typology as the SEEA Ecosystem Type Reference Calculation will allow for meaningful and effective reporting and comparison at the international level. However, with many ecosystem classification frameworks that already exist, there is a need to consider and provide guidance to national governments on how the IUCN GET will align and link to existing national ecosystem classification schemes.

Furthermore, the IUCN GET appears to completely omit ephemeral, temporary, and seasonal wetlands under the Palustrine Wetlands biome. This covers an enormous range of wetlands that provide critical habitat and other ecosystem services globally.

**Question 3. Do you have any comments on the recording of changes in ecosystem extent and ecosystem condition, including the recording of ecosystem conversions, as described in chapters 4 and 5?**

If implemented at the national level, the proposed annual reporting approach for recording changes in ecosystem extent and condition would provide critical detailed information to inform national and sub-national ecosystem conservation decisions and policies. However, we are concerned that the high resource costs and existing significant national data gaps in ecosystem monitoring information may create a barrier for many countries to develop ecosystem accounting at the national level and in turn, will limit SEEA EEA uptake by national statistical offices. To encourage national government action to address this challenge, we recommend providing guidance on the types of institutional mechanisms, the scale and extent of national ecosystem data, and national data infrastructure that are needed to operationalize national spatial data for ecosystem accounting and to enable implementation and reporting of SEEA at the national level.

In our view, it would be beneficial to identify clear national policy uses for ecosystem accounting that would demonstrate the benefits of SEEA implementation at the national level (e.g., the vital role the SEEA can play as a national measurement framework for measuring progress of the 2030 Agenda for Sustainable Development). This is an important step in helping to catalyze the government leadership and investments in the science, geospatial data and institutional frameworks that are needed to accurately and comprehensively measure, monitor and report changes in ecosystem extent and condition and flows of goods and services over time.

Furthermore, within chapters 3-5, it would be helpful to clearly indicate and provide examples of how assessment units, ecosystem extent and condition will be used in the calculation of ecosystem services and their valuation within an economic framework. In our view, this is an important consideration when linking the framework to practical application.
**Question 4.** Do you have any comments on the three-stage approach to accounting for ecosystem condition, including the aggregation of condition variables and indicators?

| DUC is supportive of the flexibility that the SEEA provides to countries to compile nationally relevant and policy-driven accounts so that the measurement framework can be adapted to countries specific policy priorities and national initiatives such as National Biodiversity Strategies and Action Plans (NBSAPs). We believe this flexibility will help to increase SEEA EEA uptake by national statistical offices. |

**Question 5.** Do you have any comments on the description and application of the concept of reference condition and the use of both natural and anthropogenic reference conditions in accounting for ecosystem condition?

| No comment |

**Question 6.** Do you have any comments on Ecosystem Condition Typology for organising characteristics, data and indicators about ecosystem condition?

| No comment |
Question 7. Do you have any other comments on Chapter 3?

No comment

Question 8. Do you have any other comments on Chapter 4?

No comment

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

No comment