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

Organization & country:	National Statistical Office, MoSPI, India

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?

NSO India agrees with the draft of the SEEA Ecosystem Accounting. Specifically, NSO India supports the dropping of the prefix, 'Experimental' in view of the numerous consultations that have been taken up on the manual with statistical offices, multilateral organisations, research institutions, and the like. Any prefix to the name of manual can impede the implementation of these accounts, since given the competing demands on resources from various sectors, countries would not like to make any commitments for an activity that is yet to obtain the status of being a 'standard'.

Comments by sets of chapters

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

No specific comments to offer

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

1. In the draft, para 3.57 discusses naturally occurring biomes and biomes defined by anthropogenic process [pg. 35, para. 3.57]. It may be relevant here to add some text on what are natural ecosystems and what are man-made ecosystems, especially in view of the fact, that this distinction is being adopted by several agencies for the purpose of monitoring. It may be appropriate to specify that natural ecosystems may not be devoid of 'human influence' as even in the naturally occurring biomes, human intervention is involved to some extent (Diaz et al., 2020). As explained in the paper,

"the 'natural' ecosystems are often managed by humans to maintain their perceived state. In these ecosystems, intervention is involved to a significant level but not to the extent that would make them 'human-made' or 'Anthromes'. The natural ecosystems do not necessarily exclude human habitation, management and use, for example the idea of community forestry is to maintain healthy forests while serving local livelihood needs. Sometimes to maintain the natural state in protected areas and wildlife sanctuaries, the control is imposed through human intervention."

Addition of text to this effect in this section may also help in reclassifying the IUCN GETs to natural/manmade ecosystems, as and when required.

2. Reference Page 36, Figure 3.1; The figure shows the vertical structure of terrestrial ecosystem, however in the figure, the Groundwater and bedrock ecosystems are also shown, but in the IUCN Global Ecosystem Typology, the groundwater comes under 'Subterranean-Freshwater Ecosystem' Realm (Refer Annex 3.2: IUCN Global Ecosystem Typology, EFG- SF1.2 Groundwater ecosystems). So, the figure creates confusion.

3. Reference Page 39, Figure 3.3; in the first block of the figures, instead of 'EA1(EA1)', it should be 'EA1(ET1)'.

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

No specific comments to offer.

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

There exist several developmental activities which have a direct bearing on the future state of environment. While it is relatively easy to gauge the immediate effect, the long term effects are often difficult to assess. This leads to a lop-sided cost-benefit analysis at the start of the project and hence, erroneous decision-making. Monetary estimates of values like the Net Present Value of an ecosystem and the flows of ecosystem services, help correct this assessment process by placing on the table a comprehensible value of the environmental goods and services under scrutiny.

There are several uses for these economic values in the domain of policy making like the assessment of damage compensation in an environmental litigation, guiding environmental regulations, evaluating a proposed environment programme and payment of ecosystem services.

In this background, it is important for the 'System of Environmental Economic Accounting' to provide the necessary guidance on the valuation methods. Chapters 8-11 describe and prescribe adequately the valuation principles and the valuation methods seem to be well-aligned with the methods prescribed under the SNA, with the differences arising only because of the nature of goods/services being transacted.

For further improving the usability, it is suggested that in 'Chapter 9: *Accounting for ecosystem services in monetary terms*', a hierarchical list for the valuation methods for each of the ecosystem services can be provided. Though the table 9.2 provides a summary of methods for estimating exchange values by ecosystem service type, a similar table can be included where several ecosystem service can be listed and the appropriate methods for their valuation can be mentioned.'

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

Chapter 12-14, though presently not complete, illustrate the uses to which the accounts can be put and hence, need to be retained in the manual.

Just like the chapter on satellite accounts in the SNA, the information on the complementary valuations is very relevant for the National Statistical Offices, since they can then design their data collection strategies appropriately so as to be able to provide better information for evidence-based decision making.

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