



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS  
STATISTICS DIVISION  
UNITED NATIONS



System of  
Environmental  
Economic  
Accounting

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## 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)

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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?**

I have already made my comments on the monetary assessment in the previous comments on the first chapters. Basically, there is nothing to add to this. I do not consider the reasoning that a monetary valuation is necessary to be convincing. At the latest since the COVID pandemic, it has become more than clear that policy is not conducted according to the extremely simplified assumptions on which the justification is based. The focus on efficiency inherent in a cost-benefit world has turned out to be a misleading reduction of complexity and a short-term thinking and short-sightedness of action that is not compatible with the goals of sustainable development.

It must therefore be noted that such a reductionist approach follows a paradigm whose incompatibility with the necessities of transformation towards long-term goals, transformative change and the preservation of the resilience of ecosystems (especially the global ones) has just been demonstrated.

An equally grave objection is its incompatibility with the principles and quality standards of official statistics. Monetary valuation on this scale and in application to non-existent markets requires to a substantial extent the definition of parameters that are not based on the usual mix of surveys (basic statistics) and transparently decided (international) conventions and standards. When simulating entire markets, one goes considerably beyond the estimates usually used in accounting to fill data gaps at the margins of actually existing markets. While this may well be justified on a small scale and at the local level, such a calibre of setting goes beyond the framework to which official statistics are obliged to adhere. Such a breach would come at the price of a serious loss of confidence in official statistics as a whole.

Furthermore, it is also about the expectations that are raised by such an approach, both with regard to the question of whether they can actually be fulfilled and with regard to the fact that possibly false thought patterns and prejudices ("what is not measured in monetary terms is not perceived politically because it is obviously worth nothing" or similar slogans) are thereby further manifested. The desired transformation process does not take place because the previous paradigms are manifested instead of being questioned.

Finally, the argument of time (and the labour capacity employed) plays a role: If it is actually a matter of protecting ecosystems and the services associated with them, as well as biodiversity, then things really must move fast. We should not waste further years with a monetisation dream, but focus on the real possibilities of physical accounting. This will also increase the chances of integrating the EEA into the international standard SEEA.

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

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

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

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

**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?**

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

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

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

**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?**

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

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

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

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

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

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

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

**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?**

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

**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?**

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

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

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