



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS  
STATISTICS DIVISION  
UNITED NATIONS



System of  
Environmental  
Economic  
Accounting

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## 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](mailto:seea@un.org)

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Organization & country:	Central Statistics Office, Ireland

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](mailto: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](mailto:seea@un.org)

## General comments

### **Question 1: Do you have comments on the overall draft of the SEEA Ecosystem Accounting?**

A very good job overall and a major achievement to pull together a range of complex material.

The draft is significantly improved on earlier version. It is cleaner, more logically ordered and easier to follow. There are, however, a number of remaining errors of grammar, missing words or problematic drafting. Some examples are marked in red. Please ignore text marked in yellow as the latter marking is for our own internal emphasis.

**Please note ‘marked up’ document in PDF format. Note the following:**

**Yellow marked text which is for our use and may be ignored.**

**Red-marked text which is problematic or in need of correction or clarification.**

**Insert comments capturing suggestions or queries. Usually these accompany red-marked text.**

**Finally, we regret that it was not possible to review the following chapters within the given deadline: 8, 9, 10, 11, 12 and 14. We plan to provide feedback on these chapters no later than 14 December. We trust that this is in order.**

## Comments by sets of chapters

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

Good introduction and overview. Some opaque paragraphs. See for example 2.58

*“A challenge in applying any values framework, especially in a measurement context, is that there is no clear demarcation between values. Value concepts are overlapping, as well as nested. Definition of policy objectives, specific decision choices ex ante and change contexts ex post help identify which values are involved and determine their scope and boundaries.*

*While this somewhat open and potentially fluid framing is necessary for recognizing all value perspectives, a consequence may be the challenges implied for implementation of multiple value perspectives in a wider institutional context”*

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

Figure 3.3 is met rather abruptly. It is cited from an earlier version of SEEA-EEA (2014). The lead in to this Figure and the direct implications for what is being discussed needs to be clearer.

The treatment of subterranean ecosystems appears confusing or contradictory in paragraphs 3.29 and 3.30.

Annex 3.1 and 3.2 are very useful albeit very technical. Chapter 4 reads well. A few minor typos are marked in red.

Use of the year 1750 as a condition benchmark point is queried (para. 4.28)

Is the opening sentence in 5.26 not tautological?

The discussion of condition in chapter 5 is very comprehensive. It is mainly pitched at a level of conceptual generalisation and abstraction that is likely to be helpful but not

definitive in how data providers decide to proceed. There is a welcome emphasis on the importance of involving ecologists and other experts in advising on benchmarks, methodology and selection of critical variables.

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

Para 6.20 is problematic. The definition economic well-being is very questionable. Amartya Sen among other economists have a much wider idea of economic well-being which includes human capabilities - freedom to attain to a good life. This is much more than any utility derived from consuming goods.

Section 6.3.5 is important (discussion of ecosystem disservices). At the time of finalising this version of SEEA-EA the emerging evidence on the impact of zoonotic transmission of diseases including, very recently, covid-19 points to a complex interaction between human behaviour and ecosystems including wild life and habitat destruction. Positive ecosystem services may be reversed due to human misbehaviour and nature takes its revenge the impacts of which are greatly magnified by globalisation in movement of goods, biomass, persons and, ultimately, viruses that latch on to as well as jump from species to species.

Paragraphs 6.78 and 6.79 provide a useful and concise clarification of how livestock is related to ecosystem services.

The discussion of abiotic flows in relation to ecosystem use and supply is less than clear (in #7.38)

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

Further comments on these chapters will be provided no later than 14 December. It was not possible to review these crucial chapters due to conflicting priorities.

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

Further comments on 12, parts of 13 and 14 will be provided no later than 14 December.  
Chapter 13 (biodiversity) – see comments in the ‘marked up’ version of the SEEA document appended to this submission.

Chapter 13 (urban space)

it is well written and easy to read. Some comments below:

Paragraph 13.90 - consider rewriting "However, the compilation of a thematic account for urban areas provides the opportunity for a more detailed accounting for urban area sub-types with the broader framing provided by the IUCN Global Ecosystem Typology which defines a broad ecosystem functional group covering urban ecosystems (Class T7.4). "

Section 13.6.3 Potential indicators for urban ecosystems is a nice section, describes some useful indicators and relates urban ecosystem accounting to SDGs.

Paragraph 13.114 typo in line 4 - should read "there is likely to be significantly relevance..."

Some examples of different approaches to mapping are provided, which are useful. It would be good to see some examples of data in tables too.