



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION
UNITED NATIONS



System of
Environmental
Economic
Accounting

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

Name:	Françoise Nirascou
Organization & country:	France - MTE/CGDD/SDES

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?

France prefers to keep the word “experimental” or “provisional” in the title and the SEEA-EEA not to become a mandatory standard. Even if a lot of work has been done, there is not yet a global agreement. Complexity is increasing through the different chapters of the manual : from ecosystems extent (data rather available), to the list of services (endless list somehow unrealistic), aggregated condition indicators (questionable), and monetisation (problematic).

Failing to keep EEA in the title, France supports the idea of splitting the current volume into two separate documents. The first one, covering biophysically-based ecosystems accounts (up to chapter 7), can be submitted the UNSC for adoption as statistical standard. The second document, regarding monetary valuation of ecosystems and related services (chapter 8 to 12), should remain experimental, at this stage of work.

Comments by sets of chapters

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

It is a too narrow perspective to appreciate ecosystems only as able to provide some benefit to the economy. The introduction needs to situate the human society inside the biosphere system and not to represent only a small part of the all system. Fig 2-1 (p. 20) considers only ecosystem services provided to economical and societal benefits, France prefers the schemes usually used for Material flow accounts which represent economy inside society, itself inside Nature. It is important to change this figure, showing also the physical or monetary flows from Economy to Nature. Such a new figure would allow considering the necessity of maintaining the world heritage in a good condition and that costs or debt for this purpose are provided by Economy to Nature. It would make visible pollution flows caused by producers.

Then the topic of maintaining the good condition of Nature for worldwide challenges (like climate change, biodiversity loss) has to be considered and not only services provided to resident users of local ecosystems.

Why not to name “World heritage” rather than “ecosystem trustee” ?

In line with 2009 Stiglitz-Sen-Fitoussi report conclusions, France considers that GDP should remain measuring production flows, and not be extended. If it is needed to consider the Net saving aggregate and its extensions to take into account the cost needed to maintain the ecosystems in a good functioning condition (compatible with human life), it should be included in the manual and be well described.

From 2013 to 2020, 40 examples of ecosystem accounting programs were completed (§1.13). This seems to justify the fact that SEEA-EEA is ripe for validation. But these examples are partial and cover only part of the manual or a single type of ecosystem or only a small area. It doesn't provide comparable data over countries. This is not a proof that all SEEA-EEA accounting is workable. Then

§1.17 emphasises that the implementation of ecosystem-based accounting is optional and that each country can choose to work on only certain parts of the accounts. In these circumstances, we don't support that SEEA-EEA could become a mandatory standard.

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

Extent accounts and their changes between two dates are certainly more feasible than ecosystem condition accounts. These raise questions on the choice of descriptive parameters for conditions, their aggregation and weighting to get a composite index, on the choice of a reference state for each ecosystem which can provoke endless debates and varies from one country to another. Therefore, comparability of results between countries will be a difficult challenge.

The results on land use change are sometimes different depending on the observation system used (type, nomenclature, scale, length of the accounting period), which requires an explanation of the methodologies used before comparing any results.

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

The "total supply" compiled as the addition of some few identified flows underestimates the global value, because many services are not identified or not measured.

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

France expresses strong concerns on these chapters. Methods like net present value, estimations based on assumptions about the future are not appropriate for statistical work and should be left to prospective work. France is attached to complementary methods: restoration costs, avoidance costs, and more widely to the concepts of resources sustainability and planet boundaries, how the economy could respect the Nature and big global challenges as climate change and biodiversity loss.

Moreover, there are so many uncertainties about valuation methods that any results should be published with valuation ranges.

As a consequence, we recommend to exclude now monetary ecosystems services accounts as a standard manual. We think it needs more research and further discussions.

This part should be presented into a separate volume from chapters 1-7 and stay very experimental.

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

France acknowledges the efforts made to take into account the comments made during the consultation and to enrich the document. But alternative value concepts could be described more positively and organised into a more comprehensive statistical approach.