



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

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Organization & country:	UNDP

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?

The case for SEEA needs to be strengthened both through this draft and in other ways including communication strategies. This is needed to ensure greater consensus with the statistical community, as well as the broader audience of policy makers and development practitioners who are key to advancing SEEA implementation. This could be done in part by including examples of actual and illustrative examples how the use of SEEA components could inform and in other ways lead to better policies and policy outcomes. This is of course implicit throughout the draft, but additional examples are needed to build the case.

Comments by sets of chapters

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

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

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

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

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

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

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

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

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

Chapter 13: It would be useful to provide boxes or cases that demonstrate the actual or potential application of the ecosystem accounts. In addition to showing how to complete the various SEEA components, examples are needed that demonstrate what can be done with it to inform policies.

For example, Table 13.1 indicates the SEEA CF leads to the Environmental Protection Expenditure Account, which leads to Financial transactions on biodiversity conservation and enhancement, which provides a 'proxy of national expenditure on environmental protection.' This leads the reader to believe (hope, trust) that (despite environment and biodiversity being different things) biodiversity expenditures can be extracted as a subset of NEEP for some actual existing accounts. However, the EPEA on page 76 and 77 would seem to indicate CEPA 6 and COFOG 5.4 are imprecise or incomplete measures of biodiversity expenditures and COFOG 5 "may not cover all expenditure on environmental protection when it is classified under other categories." So, how imprecise is it as applied to biodiversity and ecosystems and are there other means to obtain better estimates? More concretely, what would be the global (or country) biodiversity expenditure figure extracted from SEEA for Aichi Target 4 or SDG 12 on Sustainable Consumption and Production? Would they be the same? Accurate? Systematically under or over count relative to other estimates theoretically and actually? What other policy applications could be advanced through successful SEEA implementation?

Chapter 14: Ecosystem condition estimates remain a concern, including clarity on who is responsible for estimating them, as well as the need consider the differences between exchange and welfare measures. For example, if we adopt exchange values for carbon our value estimate will be 20-25X lower than if we adopt the most commonly accepted welfare value for the same ton of carbon. Since the welfare measure is the 'theoretically correct' global value, can we afford to be wrong by twenty-five fold just because it is inconvenient or controversial to accept anything but what the market tells us? Is market failure not the point of environmental mainstreaming in the first place?