DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION
UNITED NATIONS

System of Environmental Economic Accounting

System of Environmental-Economic Accounting 2012 – Experimental Ecosystem Accounting Revision

First Global Consultation on:

Chapter 3: Spatial units for Ecosystem Accounting

Chapter 4: Accounting for Ecosystem Extent

Chapter 5: Accounting for Ecosystem Condition

Comments Form

Deadline for responses: 30 April 2020
Send responses to: seea@un.org

Name:	Barbara Bacigalupi
Organization & country:	European Commission, DG Environment

The comment form has been designed to facilitate the analysis of comments. There are nine 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.

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

Question 1: Do you have any comments on the definition and description of ecosystem assets and ecosystem accounting areas and the associated measurement boundaries and treatments?

As regards, some linear features that are ecologically linked to surrounding landscape, such as ditches or hedgerows in a pasture landscape, chp. 3 recommends that they should not be separately identified and any associated length (or possible area) should be attributed to the ET of the surrounding ecosystem.
We are in favour for a separate identification due to the importance of such elements for biodiversity.

Question 2. Do you have any comments on the use of the IUCN Global Ecosystem Typology as the SEEA Ecosystem Type Reference Classification?

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

Question 3. Do you have any comments on the recording of changes in ecosystem extent and ecosystem condition, including the recording of ecosystem conversions, as described in chapters 4 and 5?

Issues: Conceptual framing on ecosystem condition and aggregation of ecosystem condition Indexes
Comments pertain to sections 5.2, 5.3, 5.30, Annex 5.1 and Annex 5.6.

1. The main underlying assumption in the document is that "aggregation" is simply the *addition* of various indexes. A much stronger emphasis needs to be given in the text to the aggregation functions or operational rules needed to derive ecosystem condition. Simple addition of many indexes can often lead to problems of interpretation and at worse lead to misleading results.

2. These operational rules and functions (including "one out all out rules" and many others are used in many cases). These rules are used in particular in EU legislation: The Birds and Habitats Directives (in this case Favourable Conservation Status), the Water Framework Directive (i.e. good ecological status) and the Marine Strategy Framework Directive (i.e. good environment status) are of particular relevance, for which a number of operational rules are used to determine condition.

3. In Annex 5.6, the Human Development Index is given as leading example. However, this is based on simple weighted addition, and known to have extensive and ongoing problems with interpretation and meaning of the results. These problems need to be mentioned and other examples given.

4. The UNCCD has a complex set of rules to determine aggregation. Given that it comes from a UN institution it is surprising that this is not given as an example. Again much more emphasis needs to be given on operational rules and function to determine condition rather than weighted addition. This inherent bias needs to be better balanced in the text.

5. The Annex 5.6 mentions the Birds and Habitats Directives. More should be detailed on this and reference should be made to other key EU legislation: the Water Framework Directive (i.e. good ecological status) and the Marine Strategy Framework Directive. All of these have detailed operational rules to determine ecosystem condition.

6. In determining condition in the UN SEEA framework, it will be essential to make sure that methods used produces results in the development of the accounts must be consistent with the objectives, assessment frameworks and reporting of existing environmental legislation. In order words, the resulting accounting statistics needs to be compatible with the criteria and outcomes of key legislation in place, and these need to be mutually supportive. This needs to be mentioned upfront to avoid parallel tracks of work in countries and regions.

Question 4. Do you have any comments on the three-stage approach to accounting for ecosystem condition, including the aggregation of condition variables and indicators?

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

Question 5. Do you have any comments on the description and application of the concept of reference condition and the use of both natural and anthropogenic reference conditions in accounting for ecosystem condition?

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

Question 6. Do you have any comments on Ecosystem Condition Typology for organising characteristics, data and indicators about ecosystem condition?

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

Question 7. Do you have any other comments on Chapter 3?

We like to ask clarification: in view on benefiting of EU knowledge, was any colleague from the European Environment Agency EEA or DEFIS involved with regard to profiling Copernicus expertise?

Question 8. Do you have any other comments on Chapter 4?

A key issue for the European Commission (in particular DG ENV and DG MARE) is linking marine activities to different sea regions and not just to a country. For example, France's fisheries statistics should be separated into Atlantic and Mediterranean. This would be also important for fisheries and shipping sectors which operate well beyond national waters. We also have similar problems linking Eurostat data to our marine regions.
So, any system of data collection for marine data should be capable of distinguishing the marine region where it occurs, not just the country.

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