



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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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 SEEA Ecosystem Accounting document is very well structured and has great logical flow in concepts. The way in which paragraphs are written to be approximately equal size and numbered makes following the concepts and in-depth discussions much easier to digest and to find specific components of interest. The draft is long, but there wasn't repetition of ideas and the concepts are presented concisely. The figures are presented well though in some instances where abbreviations are used it may be beneficial to add a small key to reduce the need for finding them in-text.

Comments by sets of chapters

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

- At section 1.1 page 1 - the heading is titled "What is SEEA Ecosystem Accounting? Though this question is not answered directly until section 1.2. For better flow, we would suggest the following:
1.11 Background
"Biodiversity loss and climate change are among the biggest challenges that humanity is facing...."
1.12 What is SEEA Ecosystem Accounting?
"The *System of Environmental-Economic Accounting - Ecosystem Accounting* (SEEA EA) is an integrated statistical framework for organizing biophysical information about ecosystems, measuring ecosystem services....."
- At section 1.5, the paragraph doesn't quite stand alone conceptually, perhaps it could be added to section 1.4 as the latter seems to provide the justification for 1.5. Alternatively, something like "The use of an accounting approach, *as opposed to...*"
- Section 1.31 is particularly powerful and articulates the overall idea of SEEA EA very well. Much of this section might then be better placed in section 1.2 (The Statistical context for Ecosystem Accounting, page 2) or even in the introduction.
- Under the section 1.4 "Connections to other measurement frameworks and initiatives", point (iii) might be best to start with as point (i) being one of the strongest advantages. Then, reference the section *1.4.3 Connection to the System of National Accounts* on page 7 where it discusses this point further.
- Section 2.39 is a core concept important to the framework but unfortunately some meaning is clouded by longwinded sentence structure. Perhaps begin, rather than end with the sentence: "Supporting the coherence of various ecological and economic data is a core feature of

ecosystem accounting”, and then cut the remaining text of the section into 2 or 3 sentences.

- The structure and components of Figure 2.2 doesn't quite illustrate the conceptual connections between ecosystem stocks and flows as well as it could, so might benefit from some review and added components of text.

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

- On page 35, sections 3.5 and 3.6 about spatial units and ecosystem assets could be combined into one section, as both are expressing very similar ideas with different terminology.
- Figure 3.3 is concise and shows the relationships between ecosystem assets and ecosystem accounting areas, but it does require quite some reading of the text beforehand to comprehend the diagram. To quicker engagement with this figure and other similar figures, perhaps a legend could be included where ET and EAT abbreviations are written out, or there are examples of the types of ecosystems that would realistically exist in the type of mosaic presented (ideally taken from and referencing Annex 3.2).
- In section 3.72 but additionally throughout the section titled *The use of data on the characteristics of land*, it could be made clearer which ecosystems are not the focus and why (presumably marine/coastal/polar), and whether this is likely to change in the future as more data becomes available, or if terrestrial ecosystems will continue to be the main focus due to land use dynamics.
- Particularly on pages 55 and 56 of Annex 3.1, there are numbered sections which only contain a sentence or very few words, and for better flow it may be better to combine some of these smaller sections, such as
- Chapter 5 has some very strong articulation of combining the ecological and economic paradigms, such as comparing the terms 'planetary boundaries' (ecology) and 'critical natural capital' (economics). This approach could be further utilised in earlier chapters in which the accounting approach is described, as this assists with cross-sectoral engagement.

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

- The distinction between SNA and non-SNA benefits is excellent here, and it might even be considered that this distinction be introduced earlier on in the document in chapter *1.4.3 Connection to the System of National Accounts*.
- On page 122, section 6.4.4 *The identification of cultural services*, there could be some recommendations on the methodologies for measuring the benefits. The use of contingent valuation, travel-cost method, and dichotomous choice for example, entail different contentious assumptions and so some discussions of the methods and/or general caveats of trying to measure very intangible values and the parameters chosen would be beneficial. This could tie in well with *7.2.7 Recording cultural services* where the issues of recording cultural ecosystem services are discussed.

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

- In chapter 8, the definitions of exchange values for ecosystem accounting, monetary valuation of ecosystem services and monetary valuation of ecosystem assets were clear and thorough. A careful explanation is provided on the potential for the monetary valuation to support policy.
- The highlighting of the coverage of ecosystem services and the use of the exchanged value concept through SEEA EA estimates are honest and clear, as well as the expectations concerning measurement and implementation (concerning future price changes and discount rates).
- Chapter 9 discusses accounting for ecosystem services in monetary terms, for which the narrative on preferred methods for SEEA EA monetary valuation purposes is constructed very well. Clear explanation of techniques for valuing transactions in ecosystem services :(directly observed values, prices from similar markets, prices from market transaction, revealed expenditure costs and hypothetical expenditures.)
- Good visual representation of the supply table for ecosystem services supply and use account in monetary terms, which might be enhanced with one accounting example to show the process of data entry.
- Chapter 10 includes good description of the links to condition and the relationship between future flows of ecosystem services and the definition of an ecosystem asset.
- In chapter 11, the extended balance sheet that better explain the links between monetary valuation of the SNA and those emerging from the SEEA EA are clear, and the energy from renewable sources and land in urban areas are helpful additions.

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

- Annex 12.1 is referred to on several occasions and provides great background information and current status of willingness to pay as a metric and related measures. Regarding point no. 2 on question 4 in this review, it would be good to direct readers to the relevant sections in Annex 12.1, particularly A12.15.
- Chapter 13 particularly 13.3 Accounting for Biodiversity is very comprehensive and covers all important topics related to the challenges and opportunities of accounting for biodiversity within SEEA. Biodiversity related to bequest and existence values (section 13.19) might also be explicitly mentioned in chapter 7 where cultural ecosystem services are discussed.
- The components and illustration of relationships shown in Figure 13.1 are effective, though the visual appeal and flow of the chart might be improved by some simple changes in colour or structure, or perhaps even be developed into a simple infographic where it is embedded in image of the landscape.