



United Nations Environment
Programme



Statistics Division
Department of Economic and Social Affairs
United Nations

Global Economy Wide Material Flow Accounting Manual

Global Consultation Comment Form

Deadline for responses: **1 March 2019**

Please send responses to: seea@un.org

Your name:	Gerry Brady
Your country/organization:	Central Statistics Office, Ireland
Contact (e.g. email address):	Gerry.Brady@cso.ie

To submit responses please save this document and send it as an attachment to the following e-mail address: seea@un.org.

The comment form has been designed to facilitate the analysis of comments. In Part I general comments on the general style, structure, content and coverage of the chapter are sought. In Part II any technical and other comments should be included.

Relevant documents

Relevant documents are available on the SEEA website at:

<https://seea.un.org/content/global-consultation-global-economy-wide-material-flow-accounting-manual>. The documents provided include:

- A cover note on the global consultation
- Draft manual and accompanying questionnaire
- Copy of comment form

1 GENERAL COMMENTS

In this section please provide general comments on the draft. You may like to consider providing comments on the style and tone, the structure and organisation, the content and coverage, and the general accessibility of the material.

We found the manual very well-structured, comprehensive, and well-written. It will be helpful to countries compiling Material Flow Accounts and is complementary to Eurostat's work in this area.

For countries that submit data to Eurostat, will the UN populate their questionnaires directly rather than requiring us to complete the UN questionnaire?

2 TECHNICAL AND OTHER COMMENTS

In the box below please supply any additional comments including those of a more technical nature. Please reference your responses with the relevant paragraph numbers or section numbers.

We find it difficult to classify limestone and crushed rock as we lack reliable information on how it is used within the economy (industrial purposes, aggregate, or ornamental stone). Would it be better to classify it according to its state as it crosses the boundary into the economy?

The section on traded biomass (3.3.1) recommends that compilers should give priority to making reliable estimates of high tonnage items. It is also important to have reliable figures for categories relating to rare metals and hazardous outflows from the economy.

In section 3.3.2, there is a discussion on the merit of separating some complex manufactured items into separate items e.g. cars into steel, aluminium, and rubber. Eurostat classifies trade data by stage of manufacturing (raw; semi-

manufactured; and finished) which provides insight into whether an economy is changing its import mix towards fully manufactured items. It is much easier to classify trade data by stage of manufacturing than to disassemble products by components.

In relation to beverages, we don't think that processed water in soft drinks and beer should be excluded.

While Air Emission Accounts should be reported on a residence principle, it can be difficult to find good data sources for making the adjustment from a territorial principle particularly for transport.

High growth in the Services sector can result in improvements in material productivity indicators without more efficient use of raw materials.