



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS  
STATISTICS DIVISION  
UNITED NATIONS

**SEEA Revision**

**SEEA Experimental  
Ecosystem Accounting**

**Comment form**

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## **Comment form for the Consultation Draft**

**Deadline for responses: 15 January, 2013**  
**Send responses to: [seea@un.org](mailto:seea@un.org)**

Your name:	Jock Martin, Head of Programme Jean-Louis Weber, Scientific Committee
Your country/organization:	European Environment Agency
Contact (e.g. email address):	<a href="mailto:jock.martin@eea.europa.eu">jock.martin@eea.europa.eu</a> <a href="mailto:jlweber@gmail.com">jlweber@gmail.com</a>

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

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

In Part I general comments on the structure and content of the draft document are sought. In Part II any other comments, particularly those of a technical nature should be included.

### **Relevant documents**

Before submitting responses you are encouraged to read

*Cover Note to the Consultation Draft*

*SEEA Experimental Ecosystem Accounting – Consultation Draft*

### **Part I: General comments**

In the box below please supply any comments on the structure of the document, the balance of material and the coverage of the draft including any thoughts on missing content.

Comments on the style, tone, and readability of the text are also welcome.

**Please reference paragraphs numbers or section numbers as appropriate.**

The SEEA Part 2 draft fulfils rather well the mandate given by the UNCEEA to the Secretariat, the World Bank and the European Environment Agency and now allows for further steps to be taken across the world on further experimentation. This achievement is the result of a genuine collective effort of the three above mentioned organisations, supported by a group of experts which met in Copenhagen, London and Melbourne and also contributed through drafting inputs on several issues, as well as steering by the Editorial Board put in place by the UNCEEA.

The European Environment Agency supports the presentation in paragraph 13 of the SEEA Experimental Ecosystem Accounting not as a statistical standard to be implemented by statistical offices jointly with partner agencies, but rather as a synthesis of the current state of knowledge on ecosystem accounting. The EEA agrees with the essential premise that the “SEEA Experimental Ecosystem Accounting is intended to provide a conceptual framework for a multi-disciplinary research programme for those countries and regions that wish to experiment with the compilation of ecosystem accounts”.

At this stage, the SEEA Part 2 on experimental ecosystem accounts is a work in progress that should aim at being upgraded in the coming years on the basis of further scientific discussions and the findings of pilot applications in voluntary countries. It is therefore more important to acknowledge the overall quality of the document and its capacity to inspire reflections and applications than to discuss this or that detail.

So considering the whole draft document, the EEA is satisfied overall. In particular, the EEA feels particularly encouraged by the full compatibility of its European accounting programme with the SEEA principles. The accounts produced and developed by the EEA are the Land Cover accounts for Europe, covering the 1990-2006 period and updated this year up to year 2012, and the experimental simplified ecosystem capital accounts 2000-2010 where accounts for biomass/carbon, fresh water, landscape and biodiversity change are being developed and will be made available in 2013. It is our expectation that these applications for Europe will benefit from the SEEA as well as contribute to the further development of the SEEA Part 2 in coming years.

The SEEA Part2 is also broadly in line with the Mapping and Assessment of Ecosystems and their Services (MAES) programme in Europe which is an analytical framework for ecosystem assessments under Action 5 of the EU Biodiversity Strategy to 2020. This assessment programme which is steered by the Joint Research Centre of the European Community has acknowledged the SEEA drafting by referring for example to the CICES draft classification of ecosystem services and contributed to its discussion. Other dimensions of the SEEA will support MAES, and MAES is likely benefit to the future research agenda regarding in particular ecosystem service valuation.

The strict articulation of the SEEA Part 2 to the SNA via the SEEA Central Framework is important guidance to the progress expected in the domain of socio-economic and environmental statistics, in particular the need of spatially referenced data, regional statistics and micro-data. In this area, the SEEA Part2 will stimulate the cooperation between the EEA and Eurostat, and again, the European experience gained will contribute to the SEEA future progress. At this point, the EEA notes that the UNCEEA has taken great care of the coordination between the SEEA and FDES revision processes and asks for its continuation.

In this respect, there would be substantial value in providing a simple picture in the first section of Chapter 1 on the links between the SNA, SEEA CF, SEEA Part 2 and

different statistical domains with explanatory text that can be readily understood by UNSC members. There are of course currently unknowns in our understanding of these links and it would therefore in addition be useful to distinguish between these areas and areas we have more knowledge/confidence around.

Last but not least, the issue of relations between ecosystem capital, ecosystem services and human well-being deserves not only scientific and methodological attention, but also political attention. There are gaps that need bridging between political expectations and scientific/methodological feasibility of measuring ecosystem services. The EEA and Nottingham University with the support of experts has focused its efforts on ecosystem services over many years on a common international classification CICES and the latest information and updates for this process can be found at [www.cices.eu](http://www.cices.eu).

## **Part II: 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 number or section number.**

As already stated, the SEEA Part 2 is a work in progress, a first step calling for further steps. On the one hand, experiments will help to better focus the accounting framework with regard to policy priorities as well as issues around the feasibility of implementation. On the other hand, a research agenda should be put in place by UNCEEA in order to clarify further on theoretical questions as well as scientific issues related to data monitoring and modelling.

For the EEA, this research agenda should prioritise the following points which are either not addressed or need further development:

- SEEA policy objectives regarding the production of indicators and aggregates of weak sustainability (mostly Part 1) vs. strong sustainability (mostly Part 2).
- Common measurement unit to be used in physical ecosystem accounts (beyond the various specific basic units of mass, energy, volume, ...) and aggregation principles.
- SEEA Part 2 aggregates: ecosystem capacity and degradation, ecological debts in physical and monetary units, adjusted final demand...
- Principles of quadruple entry accounting within the SEEA Part 2 and between Part 2 and Part 1
- Measurement of ecosystem remediation costs (restoration, avoidance...), in line with the emerging mitigation and compensation policies.
- Adequacy of SNA pricing conventions regarding ecosystem services and assets, in particular in the case of production for self-account (family gardens, housing...).
- Measurement of the sustainability of commodities production, in particular agriculture, forestry and fisheries.
- Development of accounts for specific ecosystems: urban ecosystems, seas and oceans, atmosphere/climate.

- Use of the outcome of international research and monitoring programmes and databases, in particular GEO/GEOSS, IUCN, WWF. Cooperation with such programmes.
- Harmonisation with monitoring programmes of international conventions.
- The human and social dimensions of ecosystem accounting (the demand side of ecosystem services, access to public goods, distributional effects, quality of life etc...)