



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION
UNITED NATIONS

**SEEA Revision
Chapters 1-6**

Comment Form

Global Consultation Comment Form

Revised SEEA Chapter 1 - 6

Deadline for responses: 7 December 2011

Send responses to: seea@un.org

Your name:	Professor Surender Kumar
Your country/organization:	India, Department of Business Economics, University of Delhi
Contact (e.g. email address):	Surender672@gmail.com

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, content and coverage of the chapter are sought. In Part II any technical and other comments should be included.

Relevant documents

Before submitting responses you are encouraged to read the accompanying papers available on the website.

Revision of the SEEA: Draft Version for Second Round of Global Consultation, October 2011 – Chapters 1 – 6

Reading guide for the SEEA Revision Second Round of Global Consultation

Supporting material for selected classifications and lists in the revised SEEA

Part I: General comments

This is the first global consultation based on the complete set of chapters for the SEEA Central Framework. In this section please provide general comments on the drafts chapters. You may like to consider providing comments on the style and tone, the content and coverage, and the general accessibility of the material.

My comments are limited only on the asset accounting and accounting for environment related subsidies.

Part II: Technical and other comments

In the box below please supply any additional comments including those of a more technical nature. As this is the first consultation where the complete 6 chapters have been released, comments on the consistency of the technical content across the chapters would be appreciated.

Please reference your responses with the relevant paragraph number or section number.

The term Environmental Goods and Services Sector (EGSS) should be used to label the group of environmental producers.

I am of the view that in the revised SEEA an EGSS should be defined with a scope equal to the production of environmental goods, technologies and services for the environmental activities of environmental protection and resource management.

In determining the main purpose of an activity the primary focus should be on the technical nature of the activity and, in border line cases, the producer's intentions. Focus should not be placed on the user's intentions.

In accounting for the transactions and units within the EGSS all of the relevant concepts and definitions should be consistent with the relevant detail of the 2008 SNA.

Activities within scope of the EGSS should be classified by the Classification of Environmental Protection Activities (CEPA) and the Classification of Resource Management Activities (CReMA) and environmentally deteriorating activities.

EGSS, though already part of the SNA, but the separate classification will help in identifying the data on these activities. But the question is this EGSS sector though contributing to the GDP is not contributing to the welfare of society directly. It is simply trying to mitigate the reduction in welfare that is happening due to deteriorating environment.

In the revised SEEA environmentally related subsidies should have a scope that includes the following types of transfers as defined in the 2008 SNA: Subsidies, Social benefits to households, Other current transfers, Investment grants, and Other capital transfers. Also the tax rebates for environmentally protective purposes should be included separately in this section.

Environment related subsidies should be included where the main purpose or subsidiary purpose of the payment is for environmental protection or resource management and it should not be restricted to environmentally protection in the sense of correcting the damages that have occurred but also for the activities that avoid the damages for being happening.

The relationship between environmentally related subsidies and potentially environmentally damaging subsidies (PEDS) should be explained in the revised SEEA but that a definition of PEDS should not be included; and Relationship between both should be explained and defined separately to avoid any confusion.

Environment related subsidies should be restricted to payments from the general government sector to all domestic sectors and the rest of the world.

Environment related subsidies should be classified according to standard economic classifications and, where possible, using classifications of environmental activities; and it should also include the taxes foregone (i.e., tax rebates).