



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS  
STATISTICS DIVISION  
UNITED NATIONS

**SEEA Applications and  
Extensions**

**Comment form**

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## Comment form for the Consultation Draft

**Deadline for responses: 31 January , 2013**  
**Send responses to: [seea@un.org](mailto:seea@un.org)**

Your name:	Michael Vardon
Your country/organization:	Australian Bureau of Statistics
Contact (e.g. email address):	<a href="mailto:michael.vardon@abs.gov.au">michael.vardon@abs.gov.au</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 Applications and Extensions – 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 Application and Extensions provides an excellent overview of the potential of SEEA to provide information for government policy development and decision-making. It is very well written and structured and all involved are to be congratulated.

We have four general suggestions for the improvement of the document.

1. Referencing: Currently the level of referencing in the document is uneven. Detailed references are cited in the text for I-O analysis but, as noted in the draft on page 93, are limited for other areas. Users of the document will need more detailed guidance and specific country examples to help show the importance of SEEA to policy makers. As such the addition of references for

other areas is a high priority. It is also suggested that a reference be made, perhaps in para 1.13, to the availability of more detail information including a reference to the UNSD on-line searchable library of publications.

2. We suggest that an annex be added showing the key tables from the SEEA Central Framework from which some of the indicators and analysis presented in the text are drawn. For example, the PSUT for water and energy, CO2 emissions, EPE, land cover, etc. While we understand that the SEEA should be view as a whole, the proposed publication in three separate parts, will mean that readers of the SEEA Extensions and Applications would need to go to a separate document to “discover” the base table from which the indicators and analyses are drawn.
3. Geo-spatial analysis could be given a little more prominence in chapter 1, perhaps as a new sub-heading. It would only need 2-3 paragraphs.
4. The addition of a glossary. Terminology is key barrier to overcome in the promotion and use of accounts and a glossary will help to explain new terms (e.g. environmental efficiency) or terms that have a specific meaning in environmental accounting, somewhat different from commonly understood definitions (e.g. volume).

## **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.**

Para 1.3 add reference to more the detailed information contained in the UNSD library of environmental account publications.

Para 1.4 add in a point, as a second sentence, on sub-national geo-spatial analysis.

Para 1.10 ‘Completion of SOME OF the analysis.... ~~may~~ WILL require’ (insert “some of” and replace may with “will”).

Para 1.11. Perhaps add a reference to some of the shorter documents prepared by the UNSD on SEEA and its use (e.g. the SEEA Briefing Note)

Para 1.16 mention could be made at the end of the land accounts and the applications of lands accounts as a starting point for ecosystem accounts

Para 1.19 (also para 2.28). The use of the term “environmental efficiency”, while in common use, is odd. Economic efficiency is how efficiently the economy is working, while environmental efficiency is how efficiency environmental resources are used in the economy. Environmental resource use efficiency is more accurate (although more wordy).

Para 1.22. It would be useful to include as an annex the key tables from the SEEA Central Framework from which some of the indicators and analysis presented in the

text are drawn. For example, the PSUT for water and energy, CO2 emissions, EPE, land cover, etc.

Para 2.2. A bit of disconnect between here and paragraphs 1.10 and 1.11 where it is said that not all information is in the accounts. Suggest to reword here recognising the points raised in 1.10 and 1.11 (as well as 2.8)

Fig 2.1. This is a good improvement on previous iterations of the “information” pyramid.

Para 2.11 The data quality framework and the notions of fit-for-purpose are related to this. A reference to data quality assessment may be needed here or perhaps in the introductory chapter.

Para 2.20. While globally this may be true, economic growth for countries is not always dependant on increasing natural resources use or pollution levels. While economic growth in Australia in recent times has been on the back of extraction on mineral resources, some economies growth relies more on service industries which use few natural resources and produce little or pollution.

Para 2.35. Air pollution also has a spatial breakdown which is important (i.e. urban air quality is an important environmental issue). An additional sentence like that at the end of 2.37 on spatial breakdown would help.

Para 2.47. Not clear what “leakage estimates” are.

Para 2.62 Good to see location as factor is considered. Perhaps explicitly mention rural and urban location of households/industries.

Para 2.80 Toxicity is also a factor. A tonne of radio-active waste is not the same as a tonne of waste to landfill. The issue is partly addressed in 2.83

2.89 Some references would greatly help this (e.g. to the Dutch and Danish work in this area).

2.102. Again references would help.

2.105 There is some work that has gone on in this area in countries (e.g. US Bureau of Labor Statistics) as well as international organisations. It would be useful to include references to these.

2.109. Also could add in a point about the measuring the shift in expenditures between government (public) and industry (private). Point is made in the sub-point in 2.110 but could be mentioned here as well.

2.157. First sentence should be made clearer or changed entirely as it is not obviously related to the second sentence of the paragraph.

2.172 The term volume as used here may not be understood by some readers. Need to say that in this case “volume” does not relate to m<sup>3</sup> or litres.

2.197. Perhaps in “money” in brackets after “currency units”.

Chapter 3. Referencing is far more extensive here than in previous chapters. This is greatly appreciated and the other chapter would benefit from similar referencing. The use of footnotes, such as footnote 11 on p. 63, that reference material from statistical offices and others would be a welcome addition to the earlier chapters.

Footnote 15 (p. 71) could also mention the units discussion in the SEEA Experimental Ecosystems Accounting.