Comment form for the Consultation Draft

Deadline for responses: 31 January , 2013
Send responses to: seea@un.org

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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 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.

This is a much improved version of SEEA Application and Extensions and we commend the editor and the board for their work.
We have three thematic concerns, all related to the presentation of examples of applications and extensions:
First, deconstructions of the data presentations should refer to the specific SEEA-CF tables so that it is easy for the compiler to replicate. We hope the next version will provide these resources in the final draft. None of the tables and figures could be replicated by an interested reader based on the information given.

Second, there must be some statement indicating whether the information presented is simply an example with made-up data or if the information derives from data that are actually collected by some country or countries. If the latter then the data should be made available so that interested readers can try their hand at reproducing the information.
Third, many of the graphs and tables are poorly labeled. Figure 2.17 is a good example: There is no x axis, and there is no reference in the text wherein one can find a definition of "environmental pressure".

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.

Chapter2
Many indicators are mentioned without many details. For example, "Key EPEA indicators", "Analysis by economic sector and industry", "Analysis by environmental activity domain", "Analysis by type of environmental output". Are there going to be references in the final document for the reader to follow-up and learn more about how to construct these indicators? If not, we suggest these be relegated to a section (or sub-section at the end of each section, as appropriate) entitled "Additional Possibilities". If these indicators have not been constructed and tested by anyone, we shouldn't be giving the impression that these indicators are definitely do-able.
2.20 It is asserted that economic growth is generally accompanied by growing demand for natural resources. This statement is more likely to be true for economies in early stages of development. One of the key drivers of economic growth in the long run is enhancements in productivity – making more with less. We suggest "economic *development* is generally accompanied…"
2.30 Cross country comparisons are often cited as a key reason to have indicators. It should be noted here that this will impact the appropriate deflator choice. (Something PPP-based appears appropriate.)
2.47 A short definition of "domestic technology assumptions" is required. Many readers will not know what this is referring to.
2.49 The "driving force" example should be "real GDP", not "GDP", for the reasons discussed in 2.30.
2.53 "whether production processes are becoming relatively more resource efficient as a result of structural economic changes towards service industries." This is not what we meant. Structural change (or "structural transformation" – the broad shift into services production and away from agriculture and manufacturing in an economy as it grows wealthier) may in itself result in a reduction in emission intensity (CO2/GDP) simply because services are not as emission intensive and manufacturing. This happens regardless of whether production processes are becoming more efficient. This kind of detail cannot be captured in indicators based on broad aggregates.

2.54 What are the two times series to be depicted on the same graph? It is unclear both in the paragraph and in the figure.
2.55 The decoupling ratio cannot be used to compare decoupling across economies. The Netherlands may currently have a low emission intensity, and the US may have a high emission intensity. If the US becomes more emission efficient over time, and the Netherlands does not, comparing this ratios would lead one to believe that the US is becoming more emission efficient than the Netherlands, when in fact it is just catching up with it.
2.83 Some explanation of how LCA can be applied to services is in order. From the examples given earlier, it appears that LCA only applies to durable goods.
2.85 It is unclear how the residual flows in the supply chain given satisfy some of the properties of indicators given in 2.6. In particular, indicators are supposed to reduce the complexity and level of detail in the original data. The chart given herein is rather complex and detailed.
2.110 This is the first time that Classification of Environmental Activities is used and the reference used in 2.187 should be placed here.
2.116 What is an environmental domain?
2.124 If multiplier analyses are covered in 3.3, why do they appear here too? In what way is the data presented here different?
2.138 This paragraph intimates that environmental tax ratios are indicators of whether environmental protection is a priority. What if a country uses regulation to combat pollution? What if it has little pollution due to reliance on renewable fuels? It seems that the tax-based indicators come with severe caveats regarding what they are actual indictors of (other than taxes), and these caveats should be stated.
2.141 Imputed implicit tax rates appears very complicated. This analysis and chart really needs a reference.
2.143 A precise definition of the "polluter pays principle" is required. Note that just because the check is written by the polluter, it does not mean that the incidence of the tax burden falls on the polluter. For instance, the polluter may simply raise prices to cover the cost of the tax.
Paragraphs 2.155 and 2.156. Instead of simply saying that the measures in monetary value is consistent with Central Framework be more specific—after all, the Central Framework describes different approaches to monetary valuation.
2.165 The paragraph should state clearly whether or not land cover classifications are part of the SEEA-CF. It is our understanding that they are not: Compliance with SEEA-CF does not entail land cover classifications, and that land cover is instead an extension. The uninformed reader may otherwise wrongly infer that land cover is in the SEEA-CF.
Figure 2.17 This chart requires more detail in order to be understandable.
Chapter 3
3.11 Only the first panel of table 3.1 is in monetary units. This should be stated clearly.
Paragraph 3.45. More has to be added about the Life Cycle Analysis—a reference describing it would be good.
Section 3.4: This is an analysis that requires additional information to that given in the SEEA-CF tables. (Specially, land cover classification.) It appears then that

it is an extension of the SEEA, and should be included in chapter 4.