

1. Terminology, throughout overall chapter: Apparently, the chapter uses the terms "firm", "establishment", "enterprise", "unit", "business", and "economic unit" in a more or less synonymous way. One may consider checking the use of these terms in relation to their meaning in the SNA2008. For instance, the SNA uses the term "firm" for illustrative examples whereas the terms "establishment" and "enterprise" have a specific SNA definition and meaning.
2. The term "monetary transaction" is a clearly defined SNA concept (SNA 2008 3.55). Please strictly avoid this term throughout the SEEA except if it is explicitly used in the SNA meaning. Further, we suggest carefully reviewing the use of "monetary" in the whole document.
3. Paragraphs 53-56: Paragraph 53 states that the output and production boundaries of SNA should be applied in Physical flow accounts. We would like to stress this statement and agree with this. The subsequent paragraphs 54 to 56 are also related to this issue but are somewhat confusing and maybe also redundant. One may consider streamlining these paragraphs a bit and making them clearer.
4. Paragraphs 79ff: Here, the term "pollutants" may be replaced by the term "substances". There are substances such as e.g. CO<sub>2</sub>, CH<sub>4</sub> etc. which are actually not considered "polluting".
5. Paragraph 89: above, one may consider inserting a sub-heading "Losses"
6. Table 2.5.2: One may add explaining text to the items "dissipative losses" and "residual heat".
7. Losses. Different types of losses are nicely described in paragraphs 121-130. Then 131 seems very succinct and may not be fully consistent with later paragraphs (e.g. 135, 141, 145, 158....). In general we favour having the treatment in monetary SUT the same as in SNA. That basically means output excludes losses. However for physical accounts there are sometimes good reasons to depart from this and show output as it occurred before deduction of losses. (e.g. electricity generated in the power station gross and then losses in distribution as intermediate consumption of the distributor).
8. Section 3.5.2; paragraphs 168 and 169: These statements are mainly related to water flows within the environment and hence one may not need these here. The concept of "inland water system" is somewhat confusing here and it is not clear how it fits into the general PSUT framework outlined in section 3.2. For instance the atmosphere is an important component of the natural environment in water PSUT. We suggest deleting or clarifying paragraphs 168 and 169.
9. Paragraph 169: The text should also refer to the potential influence of economic activities on water quality. Therefore add, at the end, 'These impacts include also possible alterations of the quality of the water.'

10. Paragraph 170: The statements are not consistent with what is shown in Table 3.5.1. The latter has actually six sections and not four in the left column.
11. Paragraph 173: While the text correctly explains that enormous quantities of water are used for cooling and hydropower, the necessary consequences are not drawn. Insert '**...enormous quantities of water; therefore the related flows must always be recorded separately.**'
12. The convention on how to treat artificial reservoirs should be made more clear and explicit (the dam is in the economy, but the water in the reservoir is in the environment).
13. Table 3.5.1: We suggest using the term "evaporation" instead of "water consumption". In SNA the term consumption is used differently.  
Water incorporated in products should be recorded as product flows as suggested by section 3.2 and paragraph 165. Important CPC product groups to be considered include agricultural products, food and beverages, drinking water, and hot steam.  
Note that usually agricultural products and food and beverages are consumed in the reporting period and thereby being evapotranspirated to the atmosphere.
14. Paragraph 180: Missing water volumes due to inconsistencies in data sources should not automatically be allocated to losses. We suggest showing statistical differences in an explicit column.
15. Paragraph 189: It seems this concept is not completely clear – could you please elaborate further (diagram?).
16. Paragraph 192: The text should cover also such cases where water is supplied for free (e.g. some places in Ireland).
17. Paragraphs 175-196: The text could be better aligned with the general framework outlined in section 3.2.  
In particular it could benefit of being more aligned to the three generic flow categories, namely natural inputs, products, and residuals. E.g. abstraction relates to natural inputs; water products are not clearly discussed (e.g. relation to CPC); water returns seem to be related to residuals (why is a "new" term introduced?).
18. Table 3.6.2: In the SUPPLY table, imports of waste products should not be shaded in grey.
19. Paragraph 228: We do not agree. A full description of EW-MFA can be found in the Eurostat 2001 publication. The OECD publication refers to the much broader defined family of various MFA.  
EW-MFA is a specific method established by the European Statistical System.