

Paras 129, 144. The treatment of losses is generally clear. But it would be worth expanding on transformation losses – this is a major problem for energy statisticians who feel that these losses are not easy to analyse and understand in the energy accounts. It would be worth adding something along the lines that ‘for analytical purposes, losses due to transformation may be treated separately’. The discussion in para. 144 just talks about excluding these losses.

Para 134. This para defines an energy flow account as being compiled in terms of energy content. Yet this is not developed further – T3.4.1 is in physical units and allows double-counting. We should have the energy flow account as part of the standard – it is an essential part of the energy accounts.

Paras 134, 140, T3.6.1, 222 (T3.6.2). The status of these classifications and units is unclear. Are these mandatory standards? Are we formally recommending/adopting the petajoule? Why don't we have a reconciliation between the SIEC and the CPC yet? Is the classification of emissions in T3.6.1 a standard? Is the classification of waste – EWC Stat – now to be a UN standard?

Paras 144, 156, T3.4.1. Not clear why the table does not distinguish non-energy uses, these are important energy material flows (some 10% of energy material use in the UK). Although we need to be aware that these uses are not final uses of the energy – they can come back into the account in a later accounting period as energy sources, through the combustion of waste oils and plastics incineration.

Para 149. Not clear why supply of electricity from households to the grid is treated as an activity allocated to the relevant industry. This may be drafting, as it is an input to the industry. Not clear either where energy produced by households for own-use should be recorded.

Paras 159, 224. Need care on the dichotomy of industry intermediate consumption and final household consumption, as general government and NPISH are also final consumers.

Paras 175, 180, 182, 195. Need care here. Water is abstracted from rivers to stand-alone reservoirs, where it is stored for later use. Water that is taken from these reservoirs should not therefore be recorded as abstraction, as this would double-count the amount of abstraction. This may mean that net natural reductions in these stocks have to be recorded as losses, though if there are net gains (i.e. precipitation exceeds evapotranspiration) then this can also be recorded as abstraction.

Para 190. Drafting is unclear. Water which is embodied in products or consumed as drinking water is not a return to the environment (or at least, not until it is released from sewers to a water body).

Para 196. Drafting unclear. Lost water due to evaporation is a return to the environment, it is not a return to ‘the water system’.

Paras 206-208 and table 3.6.1 – The air emissions account and the definitions used in table 3.6.1 require further explanation, also some clarity on how the three parts to the table add value. Section jumps too quickly to discussing boundary issues.

Paras 207, 220. Need some more discussion on time accounting issues. Purchase of a product in economic terms is not always at the same point as the use (e.g. of the energy, or the generation of emissions) in physical terms. Emissions from waste are particularly difficult, as the waste reaches landfill at a different point to when the material was ‘used’ in an economic accounting sense, and then there is a further time delay between the waste reaching landfill and the release of emissions.

Para 211, 216. More care needed on carbon capture, or what the UNFCCC call removals. The capture of GHG by managed forests should be included in air emission accounts, and would be recorded in T3.6.1. Some further discussion on LULUC emissions is also needed.