Comment form for the Consultation Draft

Deadline for responses: 15 January, 2013
Send responses to: seea@un.org

Your name:	Laure Ledoux
Your country/organization:	European Commission, Directorate General Environment
Contact (e.g. email address):	Laure.Ledoux@ec.europa.eu

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 Experimental Ecosystem Accounting – 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.

Click here and start typing (The length of your response is not limited by this text box.)

These comments are from the Directorate General Environment of the European Commission, and are therefore provided from a policy perspective. This complements the comments already sent by Eurostat, which were provided from an official statistics perspective.

The overall document is well written and of high quality, and provides a wealth

of useful information on ecosystem accounting, whilst also highlighting the challenges. The document would however gain in clarifying/further developing the issues below.

Para 1.3 usefully points out that ecosystem accounting complements the SEEA Central Framework by taking into account unpriced ecosystem services, and allowing to evaluate trade-offs between different types of ecosystem services. However, the emphasis of the description of the objectives of ecosystem accounting in section 1.4 seems to focus on better environmental management. The wider implications in terms of better measuring national wealth and contributions to human wellbeing could be more prominent and highlighted perhaps already in section 1.1.

Some additional elements of policy context would also be useful. In particular, the existence of a global target under the Convention on Biological Diversity should be mentioned, i.e. Aichi Target 2: 'By 2020, at the latest, biodiversity values have been integrated into national and local development and poverty reduction strategies and planning processes and are being incorporated into national accounting, as appropriate, and reporting systems'. This global target has been translated into many national biodiversity plans (e.g. EU Biodiversity Strategy to 2020). Obvious places to refer to this would be para 1.23 and 4.100/4.101.

Given that ecosystems are often defined as a component of biodiversity in particular under the CBD definition, the introduction of 'biodiversity accounts' at a late stage of the report, after carbon accounts, is confusing. The link between biodiversity, ecosystems and ecosystem services, and how ecosystem accounting relates to these elements should be explained upfront in the report. It could also be argued that the whole concept of ecosystem accounting is about integrating biodiversity and ecosystem values in accounting systems, and that biodiversity accounts, which focus on the diversity of species, are a specific component of the overall approach.

The recognition in para 2.26 and 2.29 that adequate accounting of ecosystem assets is also important is essential. This could also be related to scientific uncertainty, and imperfect knowledge of the link between biodiversity, ecosystem condition, and ecosystem services, which implies that a pure focus on ecosystem services would not be sufficient. Similarly, in 3.9, it is important to recognise that although the definition of ecosystem services excludes the set of flows commonly referred to as supporting services, mapping the chains of ecosystem flows may be important in certain situations. These 'situations' could usefully be further elaborated upon.

Another important issue which would gain in being further explained/elaborated upon is the indication in para 2.37 that 'often, there is a greater interest in measuring changes in ecosystem assets' (see also 4.17).

Para 2.105, and para 3.14 to 3.17: it should be more explicit that the main reason for excluding abiotic services is that they are already taken into account

in the central SEEA framework, and that this is an accounting method more than an assessment as to whether they should be considered as ecosystem services. Para 3.17 could be more definitive about the need to use the two frameworks in conjunction for adequate policy making.

Para 3.73: the list of prioritisation criteria should indeed be indicative as criteria will vary depending on national policy priorities.

In para 3.74, it seems to be suggested that the focus on ecosystem services should be on provisioning services, because they are easier to measure. However, they are also the ones that are most often marketed, and therefore captured in SEEA Vol 1. It should be underlined that most of the added value of SEEA Vol 2 would be in measuring other types of services, e.g. regulating services, even if more challenging to measure, in order to enable the analysis of trade-offs across the whole range of ecosystem services.

In para 5.8, the presentation of two primary motivations for valuation seems to be fairly restrictive. There should at least be a brief reference to other uses (project evaluation and appraisal, awareness raising,…).

Para 5.12: whilst the benefits of monetary valuation are well described, it should also be underlined that monetary valuation provides a common unit of measurement and therefore implies perfect substitutability, whilst there are many cases where this assumption is not valid. Monetary valuation should therefore always be used alongside physical ecosystem accounts, and does not aim to replace them.

The whole section on adjusted income aggregates (para 6.4.4) is very brief. If not feasible to extend it, there should at least be further references for the interested reader.

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.

Click here and start typing (The length of your response is not limited by this text box.)

Para 1.5: in theory, a single agency with the different types of expertise needed could carry out the work. It would be more correct to highlight the need for multiple disciplines, and that therefore it is highly likely that multiple agencies need to be involved (as better described in 1.28).

Para 1.17. why are only alternative uses of energy highlighted as an issue, and not alternative uses of other resources?

Para 1.23. The statement that 'the measurement of ecosystems requires data on biodiversity and carbon' seems to be very restrictive – there are other dimensions to measure.

Para 1.42. This paragraph could also highlight that the existence of thresholds that are unknown are an additional challenge in the management of ecosystems.

In several places, ecosystem services are defined as unpriced (e.g. 1.46). As several provisional services are in fact priced, it would be more correct to refer to 'often unpriced services'.

Para 4.99. other examples of indirect drivers of biodiversity loss may be useful, e.g. pollution.

Para 4.101 and 4.102. The explicit reference to ecosystem restoration would be useful in these paragraphs.

In Para 4.109, it should also be highlighted that intermediate disturbance (including through human intervention) can lead to increases of biodiversity, and Para 4.108 should therefore be nuanced somewhat. In this and the following paragraphs (in particular para 4.113), it should be underlined that in some regions of the world like Europe, a lot of the remaining biodiversity is linked to human intervention (e.g. extensive agricultural ecosystems), and therefore indicators such as mean species abundance, which compare ecosystems to a reference condition, are not so relevant.