



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION
UNITED NATIONS

SEEA Revision

**SEEA Experimental
Ecosystem Accounting**

Comment form

Comment form for the Consultation Draft

Deadline for responses: 1 January , 2013
Send responses to: seea@un.org

Your name:	Michael Nagy
Your country/organization:	Qatar Statistics Authority
Contact (e.g. email address):	mnagy@qsa.gov.qa

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.

The document provides a good starting point for organising information on ecosystems and on the measurement of services they provide. Not all chapters have reached the same level of maturity yet.

The interrelationship between SNA, SEEA Part I and SEEA Part II, experimental ecosystem accounting, data requirements and policy needs is well presented. However, even if it is stated several times in the document that there are challenges in measurement and data availability, there is no reference to the recent work of UNSD on

the revision of the Framework for the Development of Environment Statistics (FDES). UNSD clarified in the international seminar "Towards Linking Ecosystems and Ecosystem Services to Economic and Human Activity" (New York, 27-29 November 2012) that the SEEA (including Ecosystem Accounting) and the revised FDES are frameworks that build on and support one another. Therefore, reference to the revised FDES should not only be given in the introduction chapter, e.g. in paragraph 1.26, but also in the "technical chapters" such as chapter 4 which is basically built upon information about appropriate characteristics of ecosystems (link to FDES component 1 required).

Chapter 2 (Principles of ecosystem accounting) is very useful and clear. For practical application several questions remain, however it is expected that they will be addressed by the research agenda and pilot country applications.

Chapter 3 (Accounting for ecosystem services in physical terms) is also well structured and clear. Weak points seem to be the units of measurement (volumes of ecosystem services, paragraph 3.25), in particular the identification of number of users (conceptually and practically). Numerical examples for all 3 types of ecosystem services would be useful for further discussion.

Chapter 4 (Accounting for ecosystem assets in physical terms) is conceptually clear. However, it would be appreciated if the link between the standard asset accounting and ecosystem accounting could be shown in form of a diagram and a numerical example.

Chapters 5 and 6 (Valuation for ecosystem accounting and accounting for ecosystems in monetary terms): Valuation of ecosystem services and ecosystems provides valuable additional information to physical accounting. The methodological options, limitations and potential inaccuracies are well described. What is missing is a discussion of the cultural and ethical aspects of giving the environment a price. Accounting in monetary terms can provide useful additional information to physical accounts and it can support awareness raising, but it should never stand alone.

However, the combined presentations for ecosystem accounting and the measurement of ecosystem degradation in monetary terms are considered useful tools for management of ecosystems and awareness raising.

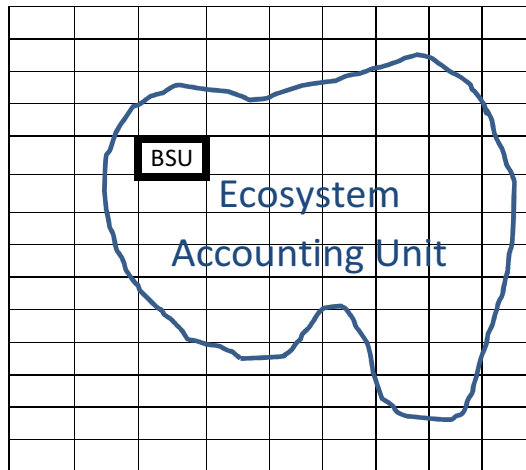
Part II: Other comments

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.

- Measurement challenges (para 1.26ff): Here could be a reference to the FDES
- Figure 2.3 (broad model of flows in ecosystem accounting): For consistency and completeness it would be good if the arrow between "Abiotic resources" and "Abiotic services" had a label (description)
- 2.3.4 Ecosystem accounting units: Please further elaborate this chapter and make figure 2.4 clearer. We understand an Ecosystem Accounting

Unit as a polygon as it can be identified from maps or remote sensing, whereas BSUs are cells of a grid and attributed with relevant information.



- 2.3.7 Issues in the delineation of units: Please provide guidance how environment statistics should be geo-referenced. Maybe link to FDES useful here.
- Paragraph 3.25: There should be more discussion about the measurement of regulating services and cultural services. How is the number of users of a cultural service, such as biodiversity of the Antarctica determined? Or has biodiversity of the Antarctica no value, or just a value for researchers (for how many)? What is the unit of measurement? There are lots of conceptual and practical questions related to that paragraph.
- Chapter 4: Accounting for ecosystem assets in physical terms: Please refer to FDES component 1 (Environmental Conditions and Quality).
- 5.2.2 The motivation for valuation in ecosystem accounting: Please address here also the problematic issues related to valuation of ecosystems: cultural and ethical aspects of giving ecosystems and their “services” a price and the concerns mentioned by W. Radermacher in his opening address to the International Seminar “Towards Linking Ecosystems and Ecosystem Services to Economic and Human Activity” (New York, 27-29 November 2012)