



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION
UNITED NATIONS

**SEEA Revision
Chapters 1-6**

Comment Form

Global Consultation Comment Form

Revised SEEA Chapter 1 - 6

Deadline for responses: 7 December 2011

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 general style, content and coverage of the chapter are sought. In Part II any technical and other comments should be included.

Relevant documents

Before submitting responses you are encouraged to read the accompanying papers available on the website.

Revision of the SEEA: Draft Version for Second Round of Global Consultation, October 2011 – Chapters 1 – 6

Reading guide for the SEEA Revision Second Round of Global Consultation

Supporting material for selected classifications and lists in the revised SEEA

Part I: General comments

This is the first global consultation based on the complete set of chapters for the SEEA Central Framework. In this section please provide general comments on the drafts chapters. You may like to consider providing comments on the style and tone, the content and coverage, and the general accessibility of the material.

The System of Environmental-Economic Accounting (SEEA) is helpful for various purposes. Though in the description of its policy relevance it should be added and stated clearly that SEEA is not able to depict environmental quality.

Figures on stocks and also on environmental services whether in physical or monetary terms cannot replace statistics on environmental quality (as air quality, water quality, soil quality, a.s.o.).

It is difficult to navigate through the document: There should be either only one table of contents (including all chapters and sub-chapters) or in addition to the chapters' tables of contents an overall table of contents specifying the chapter headings.

The document proposes to represent the circular flow of materials/waste/recycling materials in a single supply/use (input/output) table (as shown in table 3.2.1 on page 67). The way chosen, to model the waste management sector leads to a representation of the flows which are very difficult to understand. In this representation industries supply both "untreated and treated waste" to themselves. It would be much more transparent to model/depict the waste management system as an own sector. Also instead of a "sector heading" "accumulation" the term "anthropogenic stock" should be used.

It is very important that the explanations of the tables in the text are fully consistent with the tables! E.g. the 5 sections mentioned in paragraph 3.187 to describe the water PSUT are called something different (different wording) in table 3.5.1.

General comments on physical flow accounts for water:

Two major things can be observed:

1. The PSUT has changed significantly from the version presented in the first global consultation. The current version is much more difficult to understand and some conceptual aspects are unclear.
2. There are some important conceptual departures from SEEA-Water (2007).

Part II: Technical and other comments

In the box below please supply any additional comments including those of a more technical nature. As this is the first consultation where the complete 6 chapters have been released, comments on the consistency of the technical content across the chapters would be appreciated.

Please reference your responses with the relevant paragraph number or section number.

Page 3, § 1.13:

It is stated that “the benefits of the SEEA to policy and decision making processes can be seen in specific areas such as ... the changing condition and health of ecosystems and their capacity to continue to deliver benefits to humanity”. We do not see how SEEA does support this insight. Perhaps the experimental environmental accounts will show this. But as we do not yet know them, this statement should be changed.

Page 4, § 1.14:

“State of the environment” is an expression which is used for environmental quality. What is meant here are “environmental stocks”! The expression should be changed to avoid misunderstanding.

Page 6, § 1.16:

Also in this paragraph “state of the environment” should be changed into “of environmental stocks”.

Page 8, § 1.26: To some extent materials are also energy carriers and contain water. Kindly add a sentence how the overlaps between subsystems energy, water and material are dealt with.

Page 36, § 2.46: I am not sure if the conversion of tonnes of oil equivalent to Gigajoule is a bigger problem as the conversion of Dollars to Euro. At least if a conversion standard exists it does not change over the years. The real problems are the lack of measurement of physical input/output-flows, the lack of knowledge what happens with the differences between input and output (has it been converted to a different output, is it part of the stock, is it part of emissions or waste, or did it dissipate), the fact that materials may be energy carriers and frequently contain water, the possibility that energy and water contents of materials may change over time, and the possibility that materials even may increase within the economic system by accepting gaseous components from the air (e.g. by binding CO₂).

Page 62, § 3.10: In strictly technical terms “flows” would be mass/time (e.g. tonne/year). If not already done in the report an explanation should be added, that usually mass-, energy- and water flows refer to a calendar year, so that by convention the time-term of the flow that is the term “per year” is skipped.

Page 62, § 3.10: Does the sentence: “At the same time a significant part of energy input is carried by physical substances, referred to as fuels, and these items are within scope of both energy accounts and material flow accounts – noting that they are measured in different units in the different accounts.” mean that fuels are accounted twice? How about the overlap between material and water flows? Are the 3 sub-systems energy, material, water really 3 separate sub-systems which combined gives the total system or is each of them a total system which describes the resource flows in the economy from 3 different angles?

Page 67: Table 3.2.1: We understand that the table is the sum of two balance lines:

Balance line a: material input into the economy = material output from the economy

Balance line b: waste input into the waste management sector = waste/recycling material output from the waste management sector.

It, however, is very difficult to understand how industry can supply to the economy both “residuals generated by industry” and “residuals following treatment.

It is strongly recommended to add the waste management sector as an own column, which supplies “recycling material” and “uses” waste instead of letting the industry “supply treated residuals to the economy”. (Also table 2.3.2 on page 35 should be changed accordingly).

Also the “sector heading” “accumulation” should be replaced by the heading “anthropogenic stock” as “accumulation” is the difference between supply and use.

Page 99, § 3.187: The 5 sections mentioned are named differently in the PSUT (table 3.5.1). It is difficult to understand the table when this is not fully consistent (word by word!). It could help if the roman numerals used in the text (i, ii, iii; iv, v) were used in the PSUT as well.

Page 99, § 3.189: An explanation is missing why households are considered to be part of the “Water collection, treatment and supply” (in table 3.5.1). As the water supply industry (ISIC 36) plays an important role as water supplier and households an important role as water users they should have their own columns.

Page 100, § 3.194:

- First sentence: “own-consumption” should be replaced by “own-use” (reason: in water statistics “consumption” and “use” have different meanings).
- General: It is difficult to understand why water abstracted by households should be allocated to water collection and supply (ISIC 36). If the column “total” of “water collection, treatment and supply” (ISIC 36) includes self-abstraction of households this will not only lead to misinterpretations but also to inconsistencies in the SEEA-W hybrid tables. Here either a better explanation is needed (including a reference where in the SEEA the relevant paragraph is describing “the general treatment of household activity”) or the columns need to be separated.

Page 101, table 3.5.1:

- Very difficult to understand when having the SEEA-W (2007) concept in mind and when comparing it to the version presented for the previous global consultation.
- Inconsistent with the explanation given in paragraph 3.187
- Physical supply table:
 - Section “Abstraction” should either be renamed to “Abstractions” (to be consistent with paragraph 3.200) or better (for better understanding of the user of the table): “Supply of abstracted water to other economic units”
 - It is difficult to understand why “water for own use” is part of the supply table. Why is a use of water part of the supply table?
 - It is not clear why ISIC 36 cannot distribute water (cells are grey).
 - Section “Flows of wastewater and reused water” should be renamed either to “Flows of wastewater and reused water” or “Supply of wastewater and reused water produced to other economic units”
- Physical use table:
 - Heading: “Flows from the Rest of the World” should be renamed to “Flows to the Rest of the World”
 - “Sources of water” should be renamed to “Abstraction of water from the environment” (to be consistent with paragraph 3.187) or “Water abstraction by industry” (as it was in the previous version sent for global consultation)
 - Section “Use of abstractions” should be renamed to “Use of abstracted water received from other economic activities”. A separation of “distributed water” and “water for own use” makes no sense here.
 - Name of section “Flows of wastewater and reused water” can remain or has to be changed to “Use of wastewater and reused water produced by other economic units”.
 - It is not clear why the cell “wastewater received from other units” is blank (instead of grey) for ISIC 36

Page 102, § 3.200: What is here called “2nd part of the supply table” is called in paragraph 3.187 a “section”. Please be consistent with the semantics (“section” versus “part”) as it is really difficult to match the text with the table!

Page 104, § 3.213:

- This is a conceptual departure from SEEA-W (2007)! Urban runoff should be conceptually treated like mine-dewatering or agricultural drainage! Monetary flows and investments concerning collection and treatment of urban runoff are related to ISIC 37, therefore, consequently the collection of urban runoff is an abstraction by ISIC 37 and the discharge is a supply by ISIC 37 (also to be consistent with the emission tables – see last sentence of paragraph 3.261!).
- “wastewater treatment” (3rd sentence and 5th sentence) needs to be replaced by “sewer”.

Page 112, § 3.258: The term “gross releases” needs an explanation.

Page 112, § 3.261: This paragraph makes clear that emissions related to urban runoff are allocated to ISIC 37. This is o.k.! But the convention in PSUT needs to be the same!

Page 113, § 3.265: The original SEEA-W (2007) concept of net and gross emission provides a very important concept and gives the emission accounts an additional benefit compared to “classical” water statistics. This concept should remain!

Page 114, table 3.6.2: The columns should be the same as in the PSUT. “Other industries” is too highly aggregated – at least manufacturing industries should have their own column.

Page 173 ff: §, 5.31 forests, chapters 5.6 and 5.8: Forest accounts seems to be o.k. and consistent with the international and national classifications and methods we use.

Page 232, § 5.326: It should be added to the end of the first sentence “used for agriculture and forestry” in order to avoid misunderstandings, because the area of soil type in general does not change except in many decades, but available area of soil suitable for agriculture and forestry will certainly change due to changes in land cover, soil quality and soil environment. In the 2nd sentence and the Table 5.7.1 it is recommended to replace soil function by soil quality (soil functions are e.g. living space for organisms, biomass production but also natural and cultural archive) and change the contents between the parenthesis to “e.g. due to compaction and acidification”.

Page 233, § 5.330: For asset accounts for the volume of soil resources classifications related to land use and land cover are more meaningful as they are important factors for soil erosion.

All other comments delivered in the previous global consultation are still valid.