



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

Your name:	Ursula Lauber
Your country/organization:	Germany/ Federal Statistical Office
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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.

Content and structure of the chapters 1-6 in general give a very comprehensible overview on the concepts of the SEEA.

However, there are some redundancies in the draft, especially between chapters 1 and 2 and the following chapters (e.g. p.7 and p.30 provide the same graphic, different versions of the PSUT in chapter 2 and 3, some overlaps with chapt. 6).

In addition, for compiling purposes the central framework will have to be complemented by more detailed information by way of handbooks, compilation guides or the like.

Chapter 4: We very much welcome the fact that “resource use” (RU) has been eliminated from the Classification of Environmental Activities.

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.

Chapter 2

Table 2.3.2: The PSUT shown in this table includes some differences compared to the PSUT versions in chapter 3 (table 3.2.1) and 6 (mixed PSUT-MSUT) especially concerning the ROW x Residual cells. This should be harmonised in order to avoid misunderstandings.

§ 2.47: There is no mention on how to classify residuals in the PSUT. This should be amended.

Chapter 3:

Table 3.2.1: On the supply side of the table both cells “A” **and** “T” include natural resource residuals. To our mind the central framework should opt for one of the possibilities. As they are closely connected to natural resource flows and in accordance with EW-MFA we would prefer to account for natural resource residuals as flows from the environment, not as a flows stemming from industries.

§ 3.48: A few explanations on how soil erosion is to be treated in the physical flow accounts would be helpful.

§ 3.71: It should be highlighted that wastes stored e.g. at the place of their generation are also residuals, but that they are registered in the PSUT at the moment they are transferred for further waste management.

§ 3.109: In the use table residuals “... flowing directly to the environment” go into Cell Q (not into Cell R) – see Table 3.2.1

Chapter 4:

§ 4.13, last sentence: To our opinion the production of goods and services used to manage or conserve natural resources is part of EGSS, but not of resource management itself. (See also CEA Classification in Table 4.2.2.) Therefore the last part of the sentence should be deleted.

§ 4.65: Proposal to delete “bio-fuels” from the list of examples for adapted goods because they are not generally “environmentally friendly” but often have severe negative impacts on the environment.

§§ 4.31, 4.100 + 4.102: Presently, Germany does not include “adapted” goods in its measurement of environmental goods and services. Although the definitions in these paragraphs seem clear they can be very difficult to apply in practice. In addition, we are not in line with the broad definition of § 4.100 stating that for example cars with lower air emissions are “cleaner” goods which should be included with the full value into EGSS (according to §4.102). This would bring us to the (misleading) conclusion that nearly the whole industrial production today is EGSS production.

§§ 4.95, 4.113 and Table 4.3.5: We would like to mention that including GFCF into EGSS surveys is not in line with the European guidelines on EGSS. One of the reasons is that often GFCF can not be allocated adequately to the production of individual environmental goods or services. The estimation approach proposed in § 4.113 does not seem satisfactory at first view.

§ 4.145: We would prefer the term "environmentally related taxes" of the previous draft over the term "environmental taxes". In contrast to the scope of environmental subsidies which is defined by their intention, the scope proposed for the environmentally related taxes is defined by the tax base independent from the motivation of the tax. Thus the term “environmentally related” seem more adequate than “environmental”.

Chapter 6:

§ 6.19: Again mention of classifications of residuals is missing (see our comment on §2.47)

Table 6.2.2: The table should be crosschecked with corresponding tables, eg with tables 6.2.1, 2.3.2, 2.3.4, 3.2.1 - especially concerning the ROW x Residual cells (see comment above)

§ 6.85: Replace “overseas” by “rest of the world”.

Annex on classifications: See attached remarks on waste categories.

Draft SEEA		
Annex_on_classifications; Point 3 , starting on p. 5:	Comments:	Waste Framework Directive ¹
<p>Page 5: The term waste management refers to activities and measures aimed at the prevention of the generation of waste and the reduction of its harmful effect on the environment, inter alia, the collection and treatment of waste, including monitoring and regulation activities. It also includes recycling and composting, the collection and treatment of low-level radioactive waste, street cleaning and the collection of public litter.</p>	<p>Waste management is usually not occupied with “prevention” of waste. This should be the task of environment policy. And waste management is also usually not occupied with the reduction of harmful effects but with the prevention of any harmful effect. The proposed definition seems in addition not clear enough: “street cleaning” as well as “collection of public litter” belongs to “collection of waste”. It is evident that these 2 fractions are included in the general collection activity. They need not to be highlighted.</p>	<p>Article 3 para 9 ‘waste management’ means the collection, transport, recovery and disposal of waste, including the supervision of such operations and the after-care of disposal sites, and including actions taken as a dealer or broker;</p>
<p><i>Page 5: Waste comprises materials that are not prime products (that is, products made for the market) for which the generator has no further use for own purposes of production, transformation or consumption, and that he wishes to dispose of. Wastes may be generated during the extraction of raw materials, during the processing of raw materials to intermediate and final products, during the consumption of final products, and during any other human activity. Residuals recycled or reused at the place of generation are excluded. Also excluded are waste materials that are directly discharged into ambient water or air.</i></p>	<p>This waste definition seems to be incorrect because also used products which someone wants to get rid of (sell) fall under the definition. It is evident that products are not waste but it is very difficult to differentiate between waste and by-products. There exist for Europe a Communication by the EU Commission which clarifies this difference². This clarification should be utilised. It is not necessary to exclude “Residuals recycled at the place of generation” from being waste. They are sometimes difficult to register, but they play a role at least for waste accounting.</p>	<p>Article 3 para 1: ‘waste’ means any substance or object which the holder discards or intends or is required to discard;</p>
<p><i>Page 6: Treatment of waste encompasses refers to any process designed to change the physical, chemical, or biological character or composition of any waste in order to neutralize it, render it non-hazardous, safer for transport, or amenable to recovery or storage, or to reduce its volume. A particular waste may undergo more than one treatment process.</i></p>	<p>The notion “a particular waste may undergo more than one treatment process” is not correct, because after any treatment the waste type is changed. It can be only said that the output of waste treatment operations (secondary wastes) can undergo further treatment and need not necessarily to be disposed.</p>	<p>Article 3 para 14: ‘treatment’ means recovery or disposal operations, including preparation prior to recovery or disposal;</p>

¹ DIRECTIVE 2008/98/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 November 2008 on waste and repealing certain Directives

² COM(2007) 59 final COMMUNICATION FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN PARLIAMENT on the Interpretative Communication on waste and by-products