



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:	Viveka Palm
Your country/organization:	Statistics Sweden
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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.

1. The report is readable in style and tone. The content covers the system well although it focuses too much on parts of the system that are not established in practice, as chapter 5 on asset accounts covers half the report. Also the physical supply and use tables are treated as if they were a core part of the system. In practice it is often the monetary supply and use tables that are the core on which physical statistics on resource use and emissions are attached to.
2. If a standard is intended to spark implementation, then it is important that it gives a realistic picture of what has become common practice. The accounts have a reputation of being complicated but in practice they are not so different from other statistics, just better adapted to integrated analysis between different parts of society.
3. In particular, the texts on land and soil accounting need to be moved to the coming reports on more experimental forms of the accounts. The report needs to be complemented with references of what studies have been done, so that countries seeking to adopt the system can gain the experience of the work that has been done so far.
4. The first chapter sets out the scope of the SEEA and it needs to become more specified, as it now promises sustainability assessments that are not within the boundaries of the statistical system. The SEEA integrates economic and environmental statistics, but since it has not developed how to include also social aspects, it is not a system that can fully answer the questions on the sustainability agenda. This step could be taken, but it is not covered in the current system.
5. Also in the first chapters, there is a focus on the state of the environment that is not seen in the SEEA. The accounts are good at showing the interactions between the driving forces, the environmental pressures and the responses. To assess the state of the environment and the environmental damages, the statistical system needs to cooperate with researchers and experts, and that is typically done outside of SEEA.
6. The statistical system shows the development but it does not make the assessment of if a policy is sustainable, it is not normative in that sense. Also here, the text in chapter 1 needs to be reformulated.
7. The texts on how the environment is viewed in the SEEA needs to be linked to some of the classifications of environmental or resource statistics. That can be started from the CEPA classification. Some of the ideas on what could be covered are better to move to coming reports, as the state of the environment is not normally covered in today's statistics.
8. The issue of valuation. What is the effect of recommending a particular method for the discount rate in the standard? We prefer to have this discussion in the experimental accounts that will follow the standard.

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 1.

Avoid the terms sustainability, impact and state of the environment.

Change the wording on how to classify the environment (environmental components) in the paragraphs 1.19 and 1.20 to better reflect how the statistics are formed today.

Avoid wording that suggests that the system makes normative analysis.

Chapter 2.

Paragraph 2.9.2 first sentence, delete the second part ‘...for the purpose of etc’.

In 2.99, avoid the example of soil resources and take an example from practice.

Chapter 3.

Avoid writing about individual products, individual components, individual substances like mercury and about soil generally, as this is not part of practice, and is misleading to write about in a standard.

Chapter 4.

In 4.45, deleted ‘value’ and write ‘cost’.

In 4.147, complement with those parts of the definition that states how the tax connects to the price of the physical unit.

In 4.173, we question the sentence starting ‘The limits are usually such that the harvest of timber satisfies conditions required for a sustainable yield’.

Chapter 5. We think that at least 5.6.5; 5.7; 5.9 and 5.10 should be moved to the next report as there is a lack of experiences about these areas that make them unsuitable in a standard. Also that the annexes should not be part of the standard.

Chapter 6. Delete the two last sentences in 6.15, as this is not how these figures are used.