# Twenty-Second Meeting of the Advisory Expert Group on National Accounts

Inter-secretariat Working Group on National Accounts

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For information

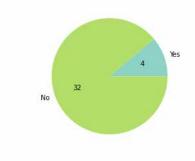
Response to Global Consultation on Annotated Outlines – 1<sup>st</sup> Round

# SNA Chapter 2 - National Accounts and measures of well-being and sustainability (CONSENTERS)

A total of 36 respondents contributed to this consultation, 29 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> <u>graphs reflect the answers of all 36 respondents.</u>

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



#### Germany (Federal Statistical Office (Destatis)): Yes

'- The draft GN WS.1 provides guiding principles for the broadening of the existing SNA framework to appropriately address wellbeing and sustainability. If these principles are still relevant, they (or some of them) should be mentioned in this chapter 2.

- The AO mentions that a "description" of wellbeing and sustainability will be provided. Although we acknowledge that definitions of wellbeing and sustainability could be challenging, they still should be included.

- Wellbeing and sustainability are highly regarded but in monetary terms extremely challenging concepts. We would like to see remarks on the limitations of the SNA to measure wellbeing and sustainability as outlined in principle on page 1 but not repeated at the following pages. Of course, this depends on the wellbeing and sustainability definitions provided in this chapter.

- Moreover, connections and differences between SNA and SDGs should be clarified in this chapter.

#### Mexico (National Institute of Statistics and Geography (INEGI)): Yes

Include more information or recommendations to improve the timeliness and frequency or wellness data. Include suggestions on sustainability indicators, since most measurement

frameworks consider indicators of current well-being as indicators of current life outcomes while measurement of well-being sustainability focuses on inputs and the resources that we need to manage in order to achieve and maintain the desired outcomes; different types of capital, mainly natural capital, economic capital, human capital and social capital, represent these resources, and the measurement focuses on flows and changes in stocks of the resources

#### United Kingdom (UK Statistics Authority): Yes

The UK wishes to highlight the omission of reference to the role of subjective well-being as well as wider personal aspects of well-being. The UK notes these are clearly outside of the SNA focus and production boundary, but these concepts should be acknowledged as being relevant and important, perhaps in section 2 of the chapter. Particularly when discussing wider measures of well-being and sustainability that are outside of the SNA set of measures (such as household saving, income to debt ratio, distributional national accounts etc) in section 2, it would seem a sensible angle to acknowledge, particularly if this concept overlaps with well-being budgets.

#### Clara van der Pol: Yes

The chapter covers well the main points and could benefit from a consideration of the following:

 The clarification of the links between the SNA chapters on well-being and sustainability and the "Beyond GDP" measurement initiatives that are taken place at the UN system level.
 The inclusion of the multiple capitals approach which aims to consider the relationship between (i) the flows of benefits (including monetary and non-monetary benefits) and (ii) the underlying stocks of capital (encompassing produced, natural, human and social capital).

3. The reference to the "Statistical Framework for Measuring the Sustainability of Tourism" as an example of a holistic and integrated framework covering the social, economic and environmental dimensions of sustainability for a specific sector. This could be placed under the section of "Overview of other statistical frameworks for the measurement of wellbeing and sustainability". The Statistical Framework for Measuring the Sustainability of Tourism is currently under development, but it is expected that finalization will take place throughout 2023 and will be presented at the 2024 UN Statistical Commission for endorsement. This fits nicely with the planning of the SNA revision. More information on the Statistical Framework for Measuring the Sustainability of Tourism

is available at:

https://www.unwto.org/tourism-statistics/measuring-sustainability-tourism

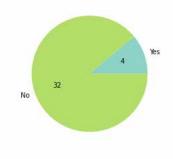
2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary?2B. If yes, please elaborate:



#### Germany (Federal Statistical Office (Destatis)): Yes

The need to define wellbeing and sustainability is stressed several times. We would prefer the text shortened concerning these slight redundancies. Another point is the communication of wellbeing and sustainability measures. We do not see the necessity to deal with it in the frame of the SNA manual itself.

3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



#### Georgia (National Statistics Officed of Georgia): Yes

Use of physical and other nonmonetary data (organized using accounting rules) in combination with the monetary data in the SNA accounts.

#### Germany (Federal Statistical Office (Destatis)): Yes

'- Regarding section "IV overview of complementary approaches to the measurement of wellbeing and sustainability", first and second bullet: So far, we understood that the topics covered by GN WS.2, WS.3, WS.4, WS.5 and sustainability (WS.6-WS.14) (mostly) benefitted from already existing guidance (called other statistical frameworks in the AO). Eventually they will be included either to the core SNA or will expand the SNA (via extended or thematic accounts or supplementary tables). Thus, they will become an integrated part of the SNA framework, demonstrated by links to other SNA chapters. That would mean that some parts of other statistical frameworks will become part of the SNA. Nonetheless, some

complementary information will still be needed from (these) other statistical frameworks. If the aforementioned was correct, this is not fully clear in the AO.

Regarding section "V Applications of SNA-related measures of wellbeing and sustainability": What are "SNA-related data"? Data from SNA extended or thematic accounts or supplementary tables, i.e. data outside the core system or something else? Please clarify.
What are "connections to private sector approaches", mentioned at page 5? These seem to be neither explained in the AO nor in (draft) GN WS.1.

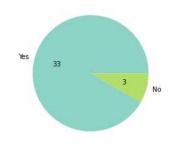
#### Perú (NATIONAL): Yes

It is not clear if well-being and sustainability measures will be treated within the system or as satellite accounts.

#### Singapore (Singapore Department of Statistics): Yes

More information is required for compilers and users to link/combine SNA with SEEA data. While there have been a few mentions related to environmental-economic accounting (i.e. SEEA) in the annotated outlines, there can be a focus on the combination of SNA with SEEA data as numerous countries have compiled SEEA related accounts.

4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate?4B. If no, please elaborate:



#### Germany (Federal Statistical Office (Destatis)): No

The core of SNA is in our view the GNI system that delivers in essence information on economic performance, i.e. especially on production, use, income and trade cycles. This outline seems to try to overcome this scope and to enter the – kind of fancy - holistic approach of welfare measurement which is sensible in itself but exceeds the possibilities of monetary terms. Hence, we would prefer a different mainstream, namely the attempt of this SNA revision to better support the measurement of wellbeing and sustainability (done elsewhere) than before and not to undertake this task internally.

#### United Kingdom (UK Statistics Authority): No

The UK agrees with the tight framing of wellbeing and sustainability as laid out in this chapter. However, the UK wishes to question whether three separate chapters – nearly a tenth of the proposed SNA – need to be devoted to these topics. The UK proposes that it may be better to review whether these three chapters can be condensed into one or two

chapters and allow this debate to occur elsewhere. The UK believes this is an important consideration for the sake of brevity.

## 5. Do you have any other comments on the Annotated Outline for this chapter? Egypt, Arab Republic (Central Agency for Public Mobilization and Statistics): No

**Germany (Federal Statistical Office (Destatis)):** '- Sustainability always involves competing goals and thus is subject to value judgments. However, since the SNA is not intended to make value judgments or express political priorities, but rather aims to establish accounting rules that are as objective as possible, it is questionable in our view whether there should be a new chapter in the SNA on the topic of sustainability at all. It remains to be seen whether individual (interim) results of the national accounts can be used as part of a sustainability assessment.

- Also, important: The (draft) GN WS.1 has not been yet in the global consultation (and is being currently redrafted). Therefore, it is difficult to comment on some parts of this AO, when the results of the global consultation for GN WS.1 are still pending. Besides, "wellbeing budgets" have not been covered by the (draft) GN WS.1 (or presentations to GN WS.1). Their benefits and potential usefulness for international purposes should be explained (or be dropped).

- Nonetheless, we appreciate the effort of the authors to explicate their concerns in detail. We suppose that these outlines would have been even more valuable in an earlier stage of the revision process.

#### Israel (Central Bureau of Statistics): Part 4 A,B

Formerly chapter 2 gave an "overview of the integrated framework" strictly NA . Will the new chapter 3 be different , otherwise we will have something broader in ch.2 and then something more narrow in ch.3

**Mexico (National Institute of Statistics and Geography (INEGI)):** Strongly emphasize the importance of other statistical frameworks for the generation of well-being indicators.

Netherlands (Statistics Netherlands (CBS)): Looks good

South Africa (Soth African Reserve Bank): No, it is a well drafted and clear annotate.

**South Korea (Bank of Korea):** From the perspective of a compiler of national accounts who did not directly involved in the SNA revision work, it would be helpful if more details about background discussions of drawing such conclusion to include 'well-being and sustainability' explicitly in the SNA are elaborated. Such addition would help compilers to read related chapters and apply those concepts.

# SNA Chapter 16 - Labour (CONSENTERS)

A total of 34 respondents contributed to this consultation, 29 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> graphs reflect the answers of all 34 respondents.

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? .5 1B. If yes, please elaborate:.5



#### Germany (Federal Statistical Office (Destatis)): Yes

Unlike to AO for chapter 2 on wellbeing and sustainability, the challenges of the designated data collection are not sufficiently emphasized. Nor is there a hint which data are truly essential and which are merely "nice to have". In our view, all data not directly connected to output and distribution belong to the latter category.

#### United Kingdom (UK Statistics Authority): Yes

The UK feels this chapter fails to recognise one of the most significant issues in this area – migration, and that it also downplays three other key issues quite considerably:

Migration between countries: The movement of labour between countries is not even mentioned in this chapter, but an integrated set of labour accounts, consistent through time, must address this very political and contentious topic. The UK stresses the importance of developing a radical new approach/definition to migration at an international level, and this forum should play an active part in accelerating this. The UK identifies the failure to recognise an internationally agreed statistical definition of migration and the contentious political implications as a clear gap in the SNA which requires urgent action.

International Labour Organisation and National Accounts: ILO definitions of the resident

workforce do not, by definition, align with the national accounts' requirement to capture the whole workforce contributing to the production of goods and services within the UK's domestic economy. ILO includes domestical labour overseas, whilst excluding non-resident labour working in the domestic economy. National Accounts requires the inclusion of non-resident labour and the exclusion of domestic labour working abroad. The UK therefore recognises that there can be no progress made in terms of aligning ILO and NA concepts until this is addressed and a guidance note published to inform the debate.

Human Capital: The UK feels that the issue of Human Capital has been significantly downplayed given its centrality to economic debate. As was recently described in a debate in the UK, 'attempting to describe the economy without mentioning human capital is like trying to describe the Himalayas without mentioning the mountains'.

Labour Productivity: While the UK understands that labour productivity will be included in a different chapter, it actively encourages consideration that the issue is brought into this chapter and multi-factor productivity could then be combined into the Capital Services chapter. The UK stresses that the benefit of including labour tables in the sequence of accounts is to better allow labour productivity to be captured, therefore labour productivity should be discussed here.

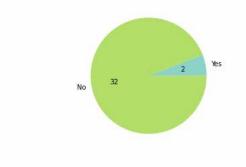
#### Clara van der Pol: Yes

In the section "Types of labour", it may be useful to also include the definition of "persons employed" (employees + self-employed) as it has been a widely used variable on employment.

In the diagram "Labour market tables framework", the "full-time equivalent jobs" seems to be missing in the "Volume" square.

For some sectors, seasonal workers are an important part of their Labour Force and it is also an important social aspect that could be considered in this chapter.





#### Germany (Federal Statistical Office (Destatis)): Yes

The text is very extensive and therefore clear and coherent, which is positive. But on the other hand, many details presented should and could be covered in chapter 16 itself and not in its introduction. This could avoid fatigue and redundancy.

#### United Kingdom (UK Statistics Authority): Yes

The UK echoes its response in SNA Chapter 22. SNA Chapter 22 addresses Digital Supply-Use Tables, SNA Chapter 23 addresses eSUTS and this chapter discusses the application of SUTs. The UK has identified this as unhelpful and unrealistic to expect NSIs to be capable of developing three independent and distinct SUT models. The UK suggests that the SNA should bring these three together and articulate how one extends the core framework to also display these additional details in an efficient and streamlined fashion.

3A. Are there any aspects of the Annotated Outline for this chapter that are unclear?.5 3B. If yes, please elaborate:.5



#### Georgia (National Statistics Officed of Georgia): Yes

Volunteer labour, Links to Supply and Use Tables - It will be great expand and clarify the discussion using numerical examples that illustrate the sequence of accounts entries under different situations.

#### Germany (Federal Statistical Office (Destatis)): Yes

'- The authors argue for this extensive data collection on all aspects related to labour with the need to establish a comprehensive and consistent data set that might be not provided from other statistics up to now. But we suggest this does not hold for countries with well-established labour market statistics like Germany and many other European countries. With the existing employment accounts – derived in Germany largely from the extensive statistics of the Federal Employment Agency and of the social insurance institutions – we already have a somewhat more reliable accounting system in place than many other countries relying on employment information mainly from establishment and household surveys. And due to the long-standing ILO definitions these labour market statistics are much less sketchy and incoherent as your text implies. And remaining differences are well understood and there for a reason.

- Another point: Detailed yet coherent labour accounts might be of great value for the interested public. But this value vitally depends on the data quality provided. Taking the

above remarks into account, establishing a second system of labour accounts would be somehow like reinventing the wheel. The resulting data would likely be of lower quality as the differing definitions and scientific objects of the source statistics are inextricable at present and would prevent data consistency, i.e. in our view a crucial attribute of national accounts. These conclusions might reflect the German perspective to some extent but in Europe the well-established labour statistics compiled by Eurostat on the ground of the national labour force surveys should support our view.

- At last: While the general importance of detailed and coherent labour and social statistics cannot be overemphasised, the annotated outline falls short in justifying why labour accounts should become a part of the core SNA. What would elaborate labour accounts within the NA framework add to existing information on labour markets and demographic data? Nonetheless, we would appreciate suggestions to establish satellite accounts concerning labour markets.

# Malaysia (DEPARTMENTS OF STATISTICS MALAYSIA): Yes

How this chapter categorize unpaid family worker?

#### Russian Federation (Federal State Statistics Service (Rosstat)): Yes

Как на основании обследования рабочей силы можно получить данные об оплаченном времени и оплаченном сверхурочно времени. В Анкете имеется вопрос только об обычной продолжительности рабочей недели и фактически отработанном времени. Отсутствует вопрос о количестве оплаченного времени и количестве оплаченного сверхурочного времени.

How paid time and overtime pay can be obtained from a labor force survey. The Questionnaire asks only about the usual length of the working week and hours actually worked. There is no question about the amount of paid time and the amount of paid overtime. (Google translation)

#### Singapore (Singapore Department of Statistics): Yes

In the section on linkages of labour market data to SUTs, it is unclear how self-employed data will be presented in the supplementary table on labour inputs.

#### United Kingdom (UK Statistics Authority): Yes

The UK wishes for Section II to be clearer on the treatment of some non-waged people who are counted as employed under ILO conventions. For example, people who work for a family business do not get paid wages but benefit from the business. Also in this section, the UK advocates for an explicit acknowledgement that the economically inactive can also provide volunteer labour, not just the unemployed.

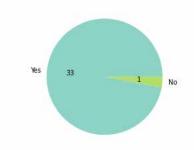
Moreover, the UK believes Section VI is unclear on the detail that will be covered. The issues currently listed are quite likely to be large, for example, Non-Observed Economy and

Regional Data. The UK questions whether these issues will be covered in detail or simply in a cursory paragraph.

#### Clara van der Pol: Yes

The mention of "regional data" seems unclear, does it refer to only sub-national administrative regions or to all kind of sub-national data? Substituting "regional" by "sub-national" will provide greater clarity and flexibility as it could be adapted to each country reality, as well as avoiding confusion with UN regional groups as groupings of countries.

4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate?4B. If no, please elaborate:



#### United Kingdom (UK Statistics Authority): No

The UK suggests that the omission of any reference to migration clearly requires addressing and therefore the balance of the chapter will fundamentally change. The UK expects to see a revised outline to be issued before drafting commences.

The UK wishes to highlight the light coverage of education and human capital in Section VII given how large and important these topics are. Reference is made to them in chapters 34 and 35, but it appears to the UK that they are barely referenced in chapter 35 where it would be relevant. The UK again refers to its comments on chapters 2, 34, and 35 that the current proposal appears fractured and too dispersed for easy use, and hence our proposal to review the potential to merge the content.

The UK believes it would be beneficial to see more of a discussion on the relationship between labour and human capital. Particularly, around some of the proposed measures on human capital stocks, but also the conceptual implication on the distinction between labour and human capital as an input into the production process and implications for productivity measures.

#### 5. Do you have any other comments on the Annotated Outline for this chapter?

**Germany (Federal Statistical Office (Destatis)):** We appreciate the effort of the authors to explicate their concerns in detail. We suppose that these outlines would have been even more valuable in an earlier stage of the revision process.

**Israel (Central Bureau of Statistics):** We have some doubts about the location of this chapter. Should it be under part C and not F?

Since these issues are outside NA. But of course indirectly included in NA under volume measures.

**Mexico (National Institute of Statistics and Geography (INEGI)):** Regarding with SUT in specific with the row "inclusion of depletion of natural resources", it would be advisable to indicate some reference on the measurement of this issue by economic activity or at least refer to the most recent of the economic environmental integrated accounts. On the other hand, in references includes the guidance note "IE.1 Statistical Framework for the Informal Economy"

**Switzerland (ILO):** We have already provided detailed inputs from ILO on the content of the chapter. Our key concern is the alignment of SNA with the ICLS standards - particularly of the 19th ICLS. This is clearly referenced within the annotated outline so we do not have immediate further comments but are ready to discuss that further as the drafting advances.

**United Kingdom (UK Statistics Authority):** The UK appreciates the proposal to link to the ILO definitions and clarify the linkages and relationships. However, this is likely to be a challenging area and would benefit from expert insight within the countries, such as the UK, who have looked to address this topic in the past.

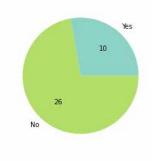
**United States (FRB):** Section 3B: The labour market tables framework diagram is very helpful, but also consider including an example of how such data could be published in time series table or matrix format.

# SNA Chapter 20 - Elaborating the accounts (CONSENTERS)

A total of 36 respondents contributed to this consultation, 31 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> graphs reflect the answers of all 36 respondents.

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



#### Germany (Federal Statistical Office (Destatis)): Yes

'- A part describing the handling of irregular frequencies is missing (i.e., annually to weekly).

- Differences between stock and flow variables.

#### Indonesia (Statistics Indonesia): Yes

General principles and methods for regionalizing export and import (both international transaction and inter-region transactions. e.g data collection, proportioning using proxies etc.

#### Israel (Central Bureau of Statistics): Yes

We would like to add more clear recommendations, where possible. For example, how the data is published (annual or quarterly rate), how many estimates/revisions should be for each quarter, method of seasonal adjustment (whether previous quarters are set or can change with each revision).

#### Netherlands (Statistics Netherlands (CBS)): Yes

In section III on spatial disaggregation/issues for particular industries, a discussion on methods for regionalizing GVA of local units without staff would be useful. Examples of such units are windfarms, solar farms and oil/gas rigs. The production of such units should be

recorded in the region where it takes place, however in practice this may prove to be difficult due to limited data sources. Guidance on the use of proxies or a discussion on general principles may therefore be useful. A similar reasoning holds for regionalization of the non-observed economy (e.g. manufacture and transportation of narcotics, prostitution).

A useful addition to section IV would be the discussion on the tradeoff between revising an account and consistency between accounts. When for instance the annual national accounts are revised, for consistency account across the whole system revisions may also be required on quarterly accounts, regional accounts, sectoral accounts and environmental accounts as there is overlap in variables between these accounts. Revising all accounts however may take too much time to do on short notice. This may therefore not always be possible, therefore a choice may be necessary between improving one account by revision and achieving consistency between accounts. A discussion on this tradeoff would be useful.

#### Singapore (Singapore Department of Statistics): Yes

Chapter 18 Section F Presentational Issues from SNA2008 seem to have been omitted.

#### United Kingdom (UK Statistics Authority): Yes

The UK considers this chapter to be inherently backward looking. Section 2 particularly fails to place sufficient emphasis on developments which are already routine in a number of countries, and which generally serve as the significant visible areas for improvement for many users:

Monthly indicators appear to be given cursory treatment. The UK feels that this guidance could be used to encourage agencies to investigate producing monthly whole economy indicators or even monthly GDP. The UK suggests that monthly GDP and its relationship with quarterly and annual estimates needs to be given far more significant focus. The country is interested in closer involvement in this issue as the drafting emerges.

Real time indicators are an area many countries significantly accelerated during Covid-19. The UK suggests that the draft as proposed would benefit from much more emphasis on the value of real-time data and could go further on their value as earlier predictors of official estimates. This varies from use in quality assurance, supplementary mainstream datasets, or being used to predict turning points, and possible uses as a composite indicator of economic activity.

#### United States (FRB): Yes

In which chapter will the discussion on discrepancies be from the old SNA chapter Elaborating and presenting the accounts?

2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary?2B. If yes, please elaborate:



## Germany (Federal Statistical Office (Destatis)): Yes

Connection between topic temporal and regional disaggregation and topic revision are not clear.

Revisions should be treated in a separate chapter.

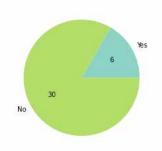
# United Kingdom (UK Statistics Authority): Yes

The UK wishes to address that this chapter attempts to cover a significant set of topics. Each of these topics are important and merit independent additional space and focus, as described above.

Simultaneously, the UK identifies certain material which appears unnecessary, being repetitious of existing guidance in other documents. For example, the UK finds it unclear the extent to which temporal disaggregation (section II) and revisions (section IV) will be reproductions of existing external material. The UK suggest that for brevity, these topics are either superfluous or at the very least can be minimised in this chapter by signposting to international manuals that already exist. For example, benchmarking, seasonal adjustment, revisions are covered more than adequately in IMF, Eurostat, OECD and UN guidance; the UK feels this would be an unnecessary duplication in the current suggested approach.

The UK also considers the topic of business cycle analysis as best left outside the formal SNA.

3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



#### Malaysia (DEPARTMENTS OF STATISTICS MALAYSIA): Yes

In terms of revision policy, how long is the revision period that is allowed, whether a year before, 2 years before or 3 years before (Quarterly compilation as well)?

# Morocco (High Commission of Planning): Yes

the novelties brought by the temporal disaggregation chapter is not clear, especially since most of the elements raised represent the current method of preparing quarterly accounts

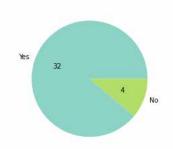
# United States (Bureau of Economic Analysis): Yes

The outline indicates that section II of the chapter will address issues related to "the compilation of intra-annual statistics, mainly focusing on quarterly data for the supply and use of goods and services." This could be read to imply that the chapter will focus primarily on the production approach to measuring GDP. The existing chapter 18 in the 2008 SNA includes various references to the expenditure approach to measuring GDP. Given different approaches to GDP measurement in different countries, a balanced approach that includes references and examples involving each of the possible conceptual approaches to GDP measurement should be maintained

# United States (FRB): Yes

The title does not convey the substance of this chapter. "Elaboration" could mean adding supplemental detail, for example. Consider revising the title such that it refers to temporal and spatial disaggregation: Selected issues on temporal and spatial disaggregation.

4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate?4B. If no, please elaborate:



#### United Kingdom (UK Statistics Authority): No

The UK feels the balance of this chapter focuses very much on continuing to do what has always been done. It is not forward thinking enough about the potential of big data and access to larger and more timely datasets.

#### 5. Do you have any other comments on the Annotated Outline for this chapter?

Australia (Australian Bureau of Statistics): No specific comments other than appreciation of the updating of the regional accounts guidance.

#### Indonesia (Statistics Indonesia): III Spatial disaggregation

**Comments:** 

Regional estimation of several accounts, such as production, supply and use of goods and service.

Documentation of some inter-region transaction may not available.

••Cross regional border commuter for connecting cities. Generally, the values of commuter transaction are not too essential, but for populous connecting cities like Greater Tokyo or Greater

Jakarta, the values of transaction matters.

**South Africa (Soth African Reserve Bank):** Could real-time/high frequency/nowcasting not also be weekly (and even daily) indicators? Currently real-time/high frequency/nowcasting indicators is discussed under Monthly indicators maybe change to Monthly/weekly and daily indicators.

Will this chapter expand more on the recommended seasonal adjustment practices so that there can be standardization where possible?

**United Kingdom (UK Statistics Authority):** In line with UK comments on various chapters, the UK strongly encourages the editorial team to reconsider the merits of streamlining. The UK suggests that chapters 20 and 21 be merged into one chapter covering

the key issues, setting aside areas which either duplicate existing guidance or which are better addressed via other means. The proposed texts for both chapters currently stray into issues which are either unnecessary or better left to country discretion.

**United States (FRB):** In section II, consider expanding slightly on seasonal adjustment, and emphasizing the topic by making it a main bullet under section 2. There are currently only two brief paragraphs under "seasonality" in the existing Chapter 18 SNA 2008. Reference links to additional guidance would be welcome as proposed.

# SNA Chapter 21-BPM Chapter 20 - Communicating and Disseminating Economic Statistics (CONSENTERS)

A total of 57 respondents contributed to this consultation, 45 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> <u>graphs reflect the answers of all 57 respondents.</u>

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



#### Indonesia (Statistics Indonesia): Yes

Utilization of social media in communication and dissemination in order to bring awareness to larger audience/users about official statistics published by NSO.

#### Israel (Central Bureau of Statistics): Yes

In section VII : Degrees of alignment to the standards should also include another dimension of the importance and size of the issue in the country. For example, if SPEs are not separately identified and they don't have high significance in the economy is one thing but if GFCF doesn't include military equipment in Israel its another thing.

#### Perú (NATIONAL INSTITUTE OF STATISTICS AND INFORMATICS): Yes

The examples mentioned in point IX are not shown

#### South Africa (Soth African Reserve Bank): Yes

1. Consider adding principles on how to effectively use graphs and tables to communicate official statistics, including the use of modern software that allows the creation of animated graphs and interactive tables.

2. Consider adding a brief discussion on the legal framework which facilitate access to source from suppliers of data will be very useful for the compilers of statistics and will also link with Section V Statistical Confidentiality.

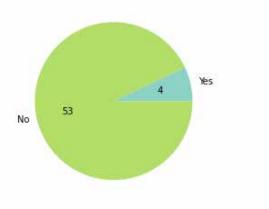
#### United States (Bureau of Economic Analysis): Yes

Section III, consider explicitly including something on best practices for publishing methodological documentation.

#### United States (U.S. Bureau of Economic Analysis): Yes

Section III, consider explicitly including something on best practices for publishing methodological documentation.

# 2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary?2B. If yes, please elaborate:



# Australia (Australian Bureau of Statistics): Yes

While it is beneficial and we are supportive of ensuring consistency in communication and dissemination of national accounts across different countries, it is suggested that the policies for communication outlined in the annotated outline are very broad and appear to be relevant for all official statistics not just national accounts. We suggest that policies around communication etc. are best left to NSOs or another set of guidance rather than the SNA.

The strategies and guidance outlined for sections 2, 3, 4 and 5 appear to be applicable more widely than just national accounts and are more suited elsewhere.

# Georgia (National Statistics Officed of Georgia): Yes

The comparison of Net Measures to Gross Measures are in excess and not of prime interest for the chapter dedicated to communication.

# United Kingdom (UK Statistics Authority): Yes

The UK is unclear from the annotated outline of the relevance and need for the sections on 'statistical confidentiality (Section V)', 'taxonomies and metadata (Section VI)' and 'a

framework for measuring alignment with the economic accounting statistical standards (Section VII)'. The UK suggests those sections be removed and treated outside of the SNA2025 manual to help focus this chapter back to the communication element. The UK encourages the editorial team to consider the degree of centralisation v subsidiarity implied by these sections. The UK considers one of the great strengths of the SNA as the permissive nature which identifies best practice but gives scope to countries to determine the best treatment for their individual needs. At first glance, this draft outline appears to not achieve a desirable balance.

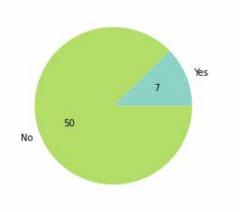
The UK considers that there may be some merit to including the SDMX aspect, but that surely is a very dynamic area that is best left to a separate set of information and guidance, as it already is.

In relation to the section on emphasising net measures over gross, whilst the UK recognises the importance of achieving this transition, it is important to highlight that this may neither be quick nor easy for many countries, particularly if they need to produce additional data on natural resources to accurately capture depletion. It is important that, as a community, we do not undermine the validity of the gross measures many countries can produce, even whilst we clarify the advantages of net measures. The UK would impress on the editorial team to carefully consider the balance here.

Furthermore, the UK harbours genuine concerns whether the proposals in Section VII duplicates guidance which is already captured by the IMF data quality assessment framework, and the degree to which developing economies may find an assessment containing a mix of results a positive feedback mechanism. The UK raises particular concerns at the risk that a negative assessment of alignment may impact on the market's / leaders' assessment of those countries. The UK would recommend that further testing is undertaken to ensure no unexpected consequences of this proposal.

The UK would actively encourage the editorial team to consider merging SNA Chapters 20 and 21, through the removal of superfluous or duplicative material and keeping this document a high level and strategic contribution.

3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



## Perú (NATIONAL INSTITUTE OF STATISTICS AND INFORMATICS): Yes

Better explain the preeminence of the net term over the gross

#### South Africa (Soth African Reserve Bank): Yes

It was not clear to what extent communication channels are going to be discussed (including benefits and drawbacks of each). It could be useful to discuss the traditional channels in addition to application programming interfaces (catering to technical users and large corporates), dashboards and even apps.

#### United Kingdom (UK Statistics Authority): Yes

Whilst it is good to see all the detail in the annotations, it highlights the breadth of topics covers. The UK feels, in this case, less is probably more in the sense that the topics should be reviewed and targeted more clearly and not repeated in wider existing external guidance. This chapter could make greater use of links in this chapter.

For example, the UK feels it is unclear how Section V relates to SNA chapter 20's main theme of communication. As above, the UK considers the easiest solution for this would be to streamline the ambition for both chapters 20 and 21 and merging these together.

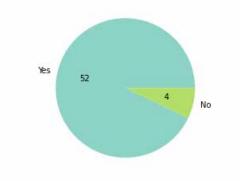
Section VI could be best re-focused on SDMX, although as the UK has highlighted already, this is a dynamic and evolving area so it could make this section obsolete quick quickly.

Section VII seems to replicate existing frameworks and tools; so the UK questions how this will differ from existing guidance already available.

#### United States (FRB): Yes

1. Consider discussing sensitive data from Section III along with confidential data in section V.

2. Section V. Statistical Confidentiality, second bullet could use clarification. In particular these statements: "As much as statistical confidentiality is very important, it should not be used per se as a reason not to release information. On the other hand, the goal should be to maximize the dissemination of information as a public good for the wide range of users while still ensuring confidentiality obligations are met. "



4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate?4B. If no, please elaborate:

#### United Kingdom (UK Statistics Authority): No

The UK suggests streamlining and refocussing this chapter, and potentially merging with SNA Chapter 20. It appears to the UK that some of the topics proposed seem also quite subjective and heavily dependent on the approach taken by individual countries. For example, 'Communications policy and dissemination strategy' will be driven by organisational needs and country demands. While this chapter could provide some examples of country practice, it is unclear if it can recommend what is best to use as it seems impossible to the UK that it can cover all situations.

#### 5. Do you have any other comments on the Annotated Outline for this chapter?

Angola (National Statistic Office): no reason for that, the comments its very clear

**Brazil (Central Bank of Brazil)**: Statistical confidentiality related to small economies, with few direct investment enterprises for instance, is a very important issue to be addressed. The self-assessment regarding the alignment with the statistical standards seems to be an interesting tool.

#### Canada (Statistics Canada): Just a comment on content:

within the Communication with Suppliers section, I wonder if it would be useful to include a portion on the importance of sensitizing data suppliers on the revision policy of the accounts.

**Indonesia (Statistics Indonesia):** It is necessary to have a standardized data template to published by NSOs so that the data release can be directly shared/used with all national

and/or international agencies. The references to SDMX will be very useful, when it applied to all NSOs, data exchange will be efficient

**Israel (Central Bureau of Statistics):** The issue of net measures could also be discussed more in other context, not only communication. Currently only discussed shortly in chapter 23.

**Liberia (CENTRAL BANK OF LIBERIA):** Our communication should also include explanation of social dynamic impacts of the statistics for the users and consuming public

**Malaysia (DEPARTMENTS OF STATISTICS MALAYSIA):** Statistics disseminated should be clear, timely and reliable to avoid misleading information in decision making. The data published should also cater the confidentiality of businesses and households where the data should be aggregated and weighted to population.

**Mexico (National Institute of Statistics and Geography (INEGI)):** We suggest considering the UNECE's "Guide to Sharing Economic Data in Official Statistics" for the purpose of alternative treatment of confidentiality. https://unece.org/sites/default/files/2021-02/Data sharing guide on web\_1.pdf

**Morocco (Morocco):** The aspects covered in this chapter are relevant and more than that, this chapter is indispensable insofar as it provides rich recommendations for managing the relations of compilers with the parties concerned in the production of balance of payments statistics.

#### Netherlands (Statistics Netherlands (CBS)): No, it looks good

**New Caledonia (IEOM):** Regarding communication with suppliers, we fully agree with the statement that "the use of language that suppliers can understand is essential in collecting data to enable the compilation of the appropriate definitions as laid out in the economic accounting statistical standards, either directly or appropriately adjusted to meet the relevant definitions".

This is why we deeply regret that a greater effort has not been made to simplify the most complex concepts in this new edition of the balance of payments manual (such as the FDIR for the collection of direct investment statistics, for example). In some cases, the new edition even proposes new concepts that are not very intuitive (such as negative exports), which can only complicate communication with suppliers (and users by the way). In addition, it should be noted that in small economies such as ours, the resources for collecting and compiling the balance of payments are (and will always be) limited. In particular, it is not possible to collect a large amount of data and then adjust it to follow methodological recommendations that are incomprehensible to the data providers. The result is more or less significant deviations from overly demanding methodological recommendations that are specific to each country and make international comparability of data illusory. We therefore advocate that not only the language, but also the methodological recommendations should be as comprehensible as possible by trying to simplify them as much as possible, the best being here clearly the enemy of the good.

We totally agree with the "Prominence of Net Measures Compared to Gross Measures". This makes the relegation of the directional principle to a memorandum item for FDI statistics all the more incomprehensible (see our comments on BPM chapter 6).

**Perú (NATIONAL INSTITUTE OF STATISTICS AND INFORMATICS):** We would be waiting for the development of some points that are pending in this chapter

South Africa (Soth African Reserve Bank): Well-structured annotate. No other comments.

**South Korea (Bank of Korea):** Despite the superiority of net measurements in terms of disposable income, many countries will have difficulty using them as major indicators due to the difficulties in measurement.

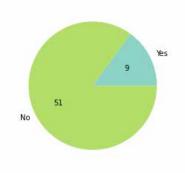
**United Kingdom (UK Statistics Authority):** The UK wishes to emphasise that this chapter should be streamlined and focused clearly on communication elements if it is to be including in the SNA 2025. The UK believes that monitoring frameworks (e.g. Section VII) should be outside of the SNA 2025 and that it would be better placed as a separate guidance for organisations looking to monitor cross-country compliance and comparisons. The UK strongly encourages the editorial team to review the need for this chapter and consider merger with Chapter 20.

# SNA Chapter 22-BPM Chapter 16 - Digitalization (CONSENTERS)

A total of 62 respondents contributed to this consultation, 46 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> graphs reflect the answers of all 62 respondents.

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



## Germany (Federal Statistical Office (Destatis)) (Federal Statistical Office (Destatis)): Yes

'- In general, it would be helpful, if the ISIC or CPC classes were given for all new definitions (e. g. cloud computing, ICT products, ...).

- For data as an asset, it is necessary to provide some kind of guidance on the treatment of data purchases in data-intensive industries. In the case of R&D, R&D purchases are recorded as intermediate consumption in the R&D industry and not as capital formation.

#### Israel (Central Bureau of Statistics) (Central Bureau of Statistics): Yes

1. Perhaps missing the important influence of digitalization of inputs. The production aspect is not only digital industries. Digitalization also affects the method of production .

2.. A section that gives examples of products and companies involved with digitalization and the appropriate product classification code and the appropriate industry classification code so that at least for the main cases there will be uniformity in the classification between the countries.

#### Italy (Banca d'Italia) (Banca d'Italia): Yes

Now, it is not yet defined definitively the nature of cryptocurrencies (financial instrument or good) and also if "exchanges", the platforms who trade these assets, are financial

auxiliary (S126) or non-financial DIPs. However, the exchanges business model is quite clear; so, we would like suggest the introduction of a paragraph (here or in Chapter 11) for clarifying the fees estimations for the exchanges. In particular if the bid/ask spread should be included in their transactions. The issue is particular relevant, because some exchanges are resident in physical paradises, and can move large volumes of cross-border transactions.

#### Liberia (CENTRAL BANK OF LIBERIA) (CENTRAL BANK OF LIBERIA): Yes

Domestic front of digitalization, captureing of digital services production in domestic economy not covered in the annotated Outline, especially inclusion for SNA purpose.

# Mexico (National Institute of Statistics and Geography (INEGI)) (National Institute of Statistics and Geography (INEGI)): Yes

As part of the analytical tools to increase the visibility of digitization, isn't it appropriate to develop a digital balance of payments? Just as creating a technological balance of payments would facilitate the measurement of some intellectual property products in the national accounts system, a subdivision of a digital balance of payments would facilitate compilation in national accounts.

## Singapore (Singapore Department of Statistics) (Singapore Department of Statistics): Yes

For the subsection on "Artificial Intelligence", we suggest to include some of the specific recommendations mentioned in the guidance note DZ.7 Improving the Visibility of Artificial Intelligence in the National Accounts, e.g. that the value of the cost of data services required by an AI are excluded from the value of AI and recorded as intermediate consumption. The annex on the measurement challenges found in the guidance note F.18 The Recording of Crypto Assets in Macroeconomic Statistics could also be included in this chapter to present the practical guidance on the recording of crypto assets.

2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary?2B. If yes, please elaborate:



3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



# Estonia (Statistics Estonia (NSI)) (Statistics Estonia (NSI)): Yes

The specific inclusion of NFTs seems a bit unclear as their broader leagal status in judiscial framework is still largely unexplored.

# Georgia (National Statistics Officed of Georgia) (National Statistics Officed of Georgia): Yes

Artificial Intelligence (AI) and Financial Digital Intermediation Platforms. It is desirable, that identify the appropriate description of the broader context that will be reflected in the SNA. It will be great expand and clarify the discussion using numerical examples and diagrams that illustrate the sequence of accounts entries under different situations.

# Germany (Federal Statistical Office (Destatis)) (Federal Statistical Office (Destatis)): Yes

'- In the DSUT notes nonfinancial DIPs are called "DIPs charging a fee". It is confusing to use different wording.

- In the DSUT guidance note there is no difference between nonfinancial and financial DIPs. It should be clarified whether financial DIPs are also included in the DSUT column "DIPs charging a fee" or in the column "Digital only firms providing finance and insurance services".

- The structure of chapter VI "Analytical Tools to Increase the Visibility of Digitalization" including two subchapters (1. Thematic Account on the Digital Economy ... 2. Digital Supply and Use Tables) might be confusing since the thematic account corresponds to DSUT. The recent structure implies a difference between the digital thematic account and DSUT. It should be clarified whether a difference between thematic account and DSUT exists.

# Liberia (CENTRAL BANK OF LIBERIA) (CENTRAL BANK OF LIBERIA): Yes

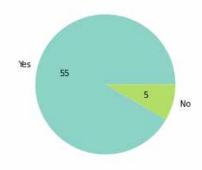
Digital platforms must also be about data dissemination synchronization by central banks, and ministries of finance on their own local websites for access.

## **Netherlands (Statistics Netherlands (CBS)) (Statistics Netherlands (CBS)):** Yes Section IV, subsection "New Financial Services and Means of Payment Enabled by Digitalization" is a bit unclear. Do the payment mechanisms constitute payment service providers? If yes, please mention this explicitly in the text. In general the description of this subsection could be more clear, for instance by providing a few examples of the 'new' financial services.

#### Netherlands (De Nederlandsche Bank) (De Nederlandsche Bank): Yes

Section IV, subsection "New Financial Services and Means of Payment Enabled by Digitalization" is a bit unclear. Do the payment mechanisms constitute payment service providers? If yes, please mention this explicitly in the text. In general, the description of this subsection could be more clear, for instance by providing a few examples of the 'new' financial services.





#### Morocco (High Commission of Planning) (High Commission of Planning): No

in my opinion, the digitization and financial system part is too detailed since a large part concerns digital financial intermediation platforms can be dealt with at the level of chapter III. Regarding fungible digital assets, they are little used internationally.

#### 5. Do you have any other comments on the Annotated Outline for this chapter?

**Australia (Australian Bureau of Statistics) (Australian Bureau of Statistics):** While the outline, structure and inclusions in this annotated chapter are good, there is still some concern about the concepts guiding free digital platforms and services which need to be fully resolved before drafting of this chapter. For example the exclusion of free digital services from data assets without explicitly excluding 'free' digital services from the definition of a barter transaction.

**Canada (Statistics Canada) (Statistics Canada):** Comment on content of this chapter: given the many nuances associated with digitalization, I think it would be very useful to include concrete examples.

**Colombia (Banco de la República) (Banco de la República):** It would be helpful to discuss further the differences between e-money and digital currencies.

**Italy (Banca d'Italia) (Banca d'Italia):** In practice, classifying a single crypto-asset into one of the proposed categories (with or without liability) could be really challenging. Furthermore, in case of crypto-asset with liability, the identification of the issuer (country and sector) and other attributes (e.g. the price of crypto-asset) might be very difficult as well

**Liberia (CENTRAL BANK OF LIBERIA) (CENTRAL BANK OF LIBERIA):** Yes. I think digitalization of this nature should take into consideration preparation for travel restrictions from next outbreaks of future pendemic. Therefore, local or national digital platforms must be focus point.

**Morocco (Morocco) (Morocco):** This new chapter on digitalization provides rich content covering the most recent aspects of international economic exchanges via digital platforms. This leads to challenges to be met by compilers in terms of statistical coverage and the choice of appropriate statistical tools: new technological devices used require suitable statistical tools.

**Morocco (High Commission of Planning) (High Commission of Planning):** I just propose to pay more attention to the definition of digital goods and services: if there is a possibility of distinguishing the divisions of the ISIC concerned to allow harmonization and minimize confusion. Also, do not omit cloud rental mode and their maintenance

**Netherlands (Statistics Netherlands (CBS)) (Statistics Netherlands (CBS)):** Many different 'new' and old digital activities are mentioned in the outline. We think it could be useful for compilers and users to describe what will and what will not part of the 'core' SNA.

**Netherlands (De Nederlandsche Bank) (De Nederlandsche Bank):** Many different 'new' and old digital activities are mentioned in the outline. We think it could be useful for compilers and users to describe what will and what will not part of the 'core' SNA.

**New Caledonia (IEOM) (IEOM):** No particular comment on this chapter, except that the fact of devoting a new chapter to this subject makes it even more shocking that the equivalent is not done for climate change, relegated to an appendix. This could be interpreted as a failure to take into account the priorities in terms of adapting the statistical framework to the main current global challenges.

However, there is a great deal of work highlighting the essential dimension of international trade (in goods, services and capital) in the climate change issue (see in particular the Christian Lininger's book Consumption-Based Approaches in International Climate Policy).

**Romania (National Bank of Romania) (National Bank of Romania):** At present it is not clear for us how to collect and compile the necessary data.

**Singapore (Singapore Department of Statistics) (Singapore Department of Statistics):** We suggest to include numerical examples, where possible, on any measurement guidance or on the setting up of analytical tools.

**South Africa (South African Reserve Bank) (South African Reserve Bank):** To ensure that chapter focus is retained, only detail relevant to BPM and SNA should be included in each manual.

**United Kingdom (UK Statistics Authority) (UK Statistics Authority):** The degree to which this chapter interacts with other chapters around prices and volume measurement, digital trade and globalisation, and SNA Chapter 25 on financial instruments (for some cryptos) is key. The UK would encourage detailed guidance to be co-located with the wider topic chapter, rather than, in some instances, being isolated here in this thematic chapter.

In particular, where this chapter addresses Digital Supply-Use Tables, section 5 of SNA Chapter 23 addresses eSUTS, and both are distinct from the proposed chapter on SUTs. The UK has identified this as unhelpful and unrealistic to expect NSIs to be capable of developing three independent and distinct SUT models. The UK suggests that the SNA should bring these three together and articulate how one extends the core framework to also display these additional details in an efficient and streamlined fashion.

**United States (Bureau of Economic Analysis) (Bureau of Economic Analysis):** Section II, consider including challenges associated with measuring the construction of server farms. Purchases of land and construction of facilities could potentially be a significant input for cloud providers.

Section V, consider explicitly noting that guidance will be provided for recording digital orders when recurring orders are set up.

**United States (U.S. Bureau of Economic Analysis) (U.S. Bureau of Economic Analysis):** Section II, consider including challenges associated with measuring the construction of server farms. Purchases of land and construction of facilities could potentially be a significant input for cloud providers.

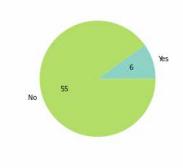
Section V, consider explicitly noting that guidance will be provided for recording digital orders when recurring orders are set up.

# SNA Chapter 23-BPM Chapter 15 - Globalization (CONSENTERS)

A total of 61 respondents contributed to this consultation, 45 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> graphs reflect the answers of all 61 respondents.

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



#### Indonesia (Statistics Indonesia): Yes

Transfer pricing has a significant role in globalization but the chapter briefly discusses it as one of the measurement challenges. Transfer pricing should be elaborated more in the compilation process of ISA because transfer pricing emerges when the transaction between an enterprise and related parties occurs (Intra-MNE flows)

#### Netherlands (Statistics Netherlands (CBS)): Yes

Guidelines on how to determine economic ownership of goods and services other than intellectual property products. The decision tree for the latter is included in the second paragraph about MNE's.

#### Netherlands (De Nederlandsche Bank): Yes

Guidelines on how to determine economic ownership of goods and services other than intellectual property products. The decision tree for the latter is included in the second paragraph about MNE's.

#### Singapore (Singapore Department of Statistics): Yes

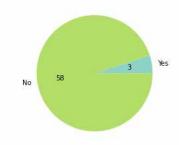
The issues discussed in G.9 Payments for Nonproduced Knowledge-Based Capital (Marketing Assets) were not included in this chapter. The drafting team may wish to

consider briefly covering the treatment of marketing assets, as well as the measurement issues.

# Spain (European Commission - Joint Research Centre): Yes

Inter-country Supply, Use and Input-Output Tables are missing in the chapter. The UN Handbook on Supply, Use and Input-Output Tables and the Eurostat's FIGARO Statistical Working Paper could be two main source of information about these tables, among others. These tables are crucial to use the analytical tools mentioned in the Chapter (e.g. TiVA). Maybe these tables are already included somewhere else in another chapter, but I just wanted to make sure that the SNA team receives my recommendation.

2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary? 2B. If yes, please elaborate:



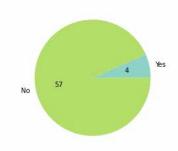
# Netherlands (Statistics Netherlands (CBS)): Yes

The discussion on AMNE and FATS (coverage, statistical units etc.) looks too extensive as it should not create new definitions or refer to specific statistics that may change specifications after the manual has been written.

# Netherlands (De Nederlandsche Bank): Yes

The discussion on AMNE and FATS (coverage, statistical units etc.) looks too extensive as it should not create new definitions or refer to specific statistics that may change specifications after the manual has been written.

3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



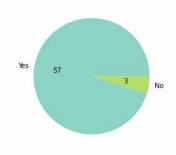
#### Indonesia (Statistics Indonesia): Yes

The illustration of SPEs should be in one subchapter.

#### United Kingdom (UK Statistics Authority): Yes

Section 5 identifies a number of gross metrics which, from the globalisation perspective, are superior to GDP. The UK recognises the movement from gross to net measures as a major thrust of the SNA revision, therefore, the failure to consider net measures here is noticeable.

4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate? 4B. If no, please elaborate:



#### Indonesia (Statistics Indonesia): No

The complete explantion of TiVA, GVC , and extended SUT should be in separate chapter.

#### New Caledonia (IEOM): No

It may be necessary to qualify the discussion of the uninterrupted progress of globalization. These have been somewhat thwarted in recent years by the Covid pandemic, the likely increase in transport costs with plans for a carbon tax in the context of climate change, and the Russian war in Ukraine. There has never been as much talk as today about the need to reindustrialize and move towards food and energy self-sufficiency, including in small island economies that have traditionally been very import-oriented. The introduction of this new chapter seems somewhat out of step with current issues (especially since no chapter is

devoted to the understanding of climate change and its consequences in the balance of payments statistics).

#### 5. Do you have any other comments on the Annotated Outline for this chapter?

**Austria (Osterreichische Nationalbank):** Possible cross-cutting issues between financial and non-financial transactions within MNEs, e.g. investment income and services, should be tackled.

**Brazil (Central Bank of Brazil):** The proposed analytical tools (item VI) can be very costly depending on the statistical capacity of each country, and the supplementary character should be highlighted

**Estonia (Statistics Estonia (NSI)):** The approach the IP of MNEs probably needs a bit more attention as these assets are very easily transferrable and can make GFCF time series very hard to interpret.

**Israel (Central Bureau of Statistics):** 1. References to various guides : it is important to refer to an appropriate guide and a specific recommendation for final decision because there have been changes in decisions over the years and the recommendations have not always been accepted.

2. Section II, MNEs : This comment is more related to the topic itself and less to the structure but we still found it important to write about it here.

According to the agreed definition of MNE in GN G.2, and with para 20 of the GN D.9 (Reconciling BPM-Based Direct Investment and AMNE Statistics):

MNE is defined as a legal entity that:

• has at least one non-resident affiliate or branch, and;

• exercises control over its affiliate(s) or branch(es) either directly—by owning over 50 percent of the voting power in the entity—or by indirect transmission of control. However, it seems that we could have still some problems with this definition regarding AMNE Statistics: For instance, if we have a very big domestic enterprise having a very small controlled affiliate abroad, then it seems that doesn't make much sense to include this MNE in AMNE Statistics as an OUT company, as the very significant values of AMNE variables (employment, turnover, value added, salaries, etc.) could distort the total variables of OUT companies in the compiling economy. This could be reflected, for instance, when you compare values of domestic variables of OUT companies with the total values of the same variables for the whole domestic economy, then you could get a much bigger than "real" share (OK, "real" must be defined exactly but still it seems that there is here a distortion) in the share of OUT companies in the whole economy. We don't know if this points to a more general issue that needs to be thought about, related to the significance of relative foreign and domestic activities of MNEs companies.

**Italy (Banca d'Italia):** As to the branches, i.e. one of the typical issues in MNEs activity measurement, we take the opportunity to say that we would appreciate a standardization of branch definition across manuals in order to classify such units in a more consistent and unambiguous way.

**Liberia (CENTRAL BANK OF LIBERIA):** Multinational Enterprises, and Special Purpose Enterprises are set up in ways that national statistics compilers can find it difficult handle in data reporting, because of insertions of exceptions to agreements that specify which national institutions to report to. Therefore, the Chapter must also consider agreements between MNEs and SPEs on one hand, and general government, on the other.

**Morocco (Morocco):** This new chapter on globalization provides a lot of useful information to understand the activities of multinational companies and their practices in terms of production and management of their cash. This requires compilers to set up new statistical tools adapted to the new data from these companies.

**Morocco (High Commission of Planning):** I wonder about the recommendations on the international transport of goods and globalization

**New Caledonia (IEOM):** We fully agree with the necessity to "emphasize the importance of reconciling FDI and AMNE statistics to address some of the measurement challenges posed by MNEs and to support analyses and policymaking". This makes it all the more incomprehensible that the directional principle has been relegated to a memorandum item for FDI statistics, whereas AMNE statistics are clearly (and rightly) based on an directional presentation (outward vs. inward).

**Singapore (Singapore Department of Statistics):** We suggest to include flow-charts, diagrams and illustrations (such as those in Annexes), where possible, to help readers visualise the complex concepts and arrangements of FGP, SPEs, etc.

**South Africa (South African Reserve Bank):** MNE's pose compilation challenges and assistance in improving understanding of MNE's will be beneficial.

**South Korea (Bank of Korea):** According to 2008 SNA(21.47), there is a distinction between BPM6 and SNA on the question of control. We hope that this discrepancy is resolved in the newly revised SNA and BPM7. Also, a part of measurement method is not included in this chapter. We understand that, as you mentioned, it is very difficult to measure the effects of globalization. However, we are concerned that each country might measure it in a different way because there is no specific description of the measurement. Lastly, it will be difficult to collect specific data on every individual multinational enterprise(MNEs).

**United Kingdom (UK Statistics Authority):** As mentioned in the UK response to SNA chapter 16, this chapter addresses Digital Supply-Use Tables, section 5 of SNA Chapter 23 addresses eSUTS, and both are distinct from the proposed chapter on SUTs. The UK has identified this as unhelpful and unrealistic to expect NSIs to be capable of developing three independent and distinct SUT models. The UK suggests that the SNA should bring these three together and articulate how one extends the core framework to also display these additional details in an efficient and streamlined fashion.

**United States (Bureau of Economic Analysis):** In Section V on Analytical Tools, the third paragraph is focused on extended supply-use tables. This paragraph indicates that eSUTs "are designed to provide granularity on the role of MNEs in production processes." It is worth noting that an extended supply-use table may explore disaggregation of underlying establishments along many dimensions other than multinational status—including size class, import and export intensity, membership in the formal versus informal economy, etc. It is appropriate to include a section in this chapter elaborating how an eSUT focused on MNE status can provide important insights into globalization. However, care should be taken to avoid defining eSUTs themselves as always and only focusing on MNEs.

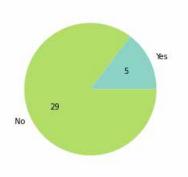
**United States (U.S. Bureau of Economic Analysis):** In Section V on Analytical Tools, the third paragraph is focused on extended supply-use tables. This paragraph indicates that eSUTs "are designed to provide granularity on the role of MNEs in production processes." It is worth noting that an extended supply-use table may explore disaggregation of underlying establishments along many dimensions other than multinational status—including size class, import and export intensity, membership in the formal versus informal economy, etc. It is appropriate to include a section in this chapter elaborating how an eSUT focused on MNE status can provide important insights into globalization. However, care should be taken to avoid defining eSUTs themselves as always and only focusing on MNEs.

# SNA Chapter 25 - Selected issues on financial instruments (CONSENTERS)

A total of 34 respondents contributed to this consultation, 28 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> graphs reflect the answers of all 34 respondents.

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



#### Mexico (National Institute of Statistics and Geography (INEGI)): Yes

It would be appropriate to add some elements that help classify crypto assets, guidance note F.18 The Recording of Crypto Assets in Macroeconomic Statistics can be taken as a starting point.

Another critical point is the issue of providing a framework that allows reconciliation between the market and nominal valuation of debt securities. Again, guidance note F.8 Valuation of Debt Securities at Both Market and Nominal Value can be taken as a starting point.

#### South Africa (Soth African Reserve Bank): Yes

In Section VI under the different financial instruments on the measurement of flows where direct data is missing add possible methods to estimate the flows. This could link to the methodology proposed in monetary and financial statistics (MFSM 2016)

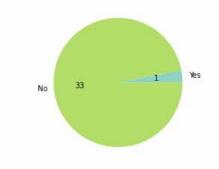
#### United Kingdom (UK Statistics Authority): Yes

The UK suggests that crypto assets which are classed as financial assets would be better included here than in SNA Chapter 22. All the financial instruments should be together for ease of use.

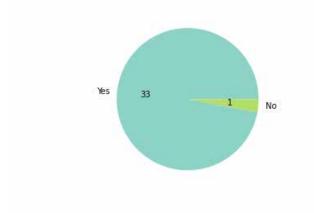
2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary?2B. If yes, please elaborate:



3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate?4B. If no, please elaborate:



#### 5. Do you have any other comments on the Annotated Outline for this chapter?.7

**Israel (Central Bureau of Statistics):** The financial chapters 24,25,26, can be combined. We don't think there is any justification for such a separation.

**United Kingdom (UK Statistics Authority):** The UK would welcome the inclusion of further detail on derivatives to meet policy needs.

The topics included in this chapter can be complex to measure. The UK encourages worked examples, including clear steps to help interpretability for inclusion.

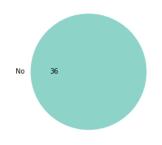
**United States (FRB):** As mentioned in our comments for the chapter on Islamic Finance, consider keeping all parts of old SNA08 Chapter 17 (Cross-cutting and other special issues) grouped together in consecutive chapters by moving Islamic Finance chapter up or down in the order.

### SNA Chapter 26-BPM Chapter 17 - Islamic Finance (CONSENTERS)

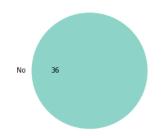
A total of 36 respondents contributed to this consultation, 29 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> graphs reflect the answers of all 36 respondents.

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary? 2B. If yes, please elaborate:



3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



#### Indonesia (Statistics Indonesia): Yes

Will the output measurement in chapter IV also be reviewed

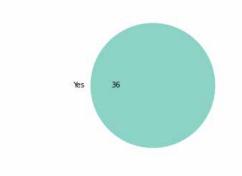
- calculation of the output for "margin" arising in the intermediary of Islamic financial assets
- volume measurement/estimation for financial output on IFIs

#### South Korea (Bank of Korea): Yes

How will this chapter affect the countries where Islamic financial activities is insignificant or do not exist in domestic transactions? Will the aspects of Islamic finance discussed in this chapter be only integrated into the

relevant country's SNA production/financial accounts? Or does this chapter mean that there will be the addition of Islamic finance to the SNA system in general?





#### 5. Do you have any other comments on the Annotated Outline for this chapter?.3

**Indonesia (Statistics Indonesia):** Is it possible to review the 2008 SNA amendments to review recommendations for calculating output and also estimating the volume of Islamic financial establishment at the regional level where financial report data for that level are not available?

**Israel (Central Bureau of Statistics):** We think it will be more suitable to include this Chapter in the Chapter dealing with the selected issues in the financial instruments. Another alternative could be changing the title by adding the word "Traditional" based on the fact of the existence of the different traditional or religious forms of finance (for example Mormons or Jewish).

Is the Islamic finance the only kind of special finance?

Please note, almost all financial institutions in Israel (such as insurance companies, investment funds, pension funds and provident funds) suggest the special investment option/rout adjusted to the requirements of the Jewish Law (Halacha) alongside the common investment option/rout such as solid and high risk level rout. The main characteristic of these special investment options/routs is the absence of the interest component, therefore the financial institution providing the Halacha investment options/routs, "shares" the ownership in the investment with the investor, so the interest payed is defined as distribution of profits. It is important to note, there is no impact on the financial report of the financial institution which records the interest and the investment transaction in a regular way. However, the special Halacha investment options/routs are reported separately in the financial reports alongside the other investment options/routs of the investment institution. Halacha investment investment options/routs are usually characterized by low investment return.

**Liberia (CENTRAL BANK OF LIBERIA):** I think Islamic Financial Chapter focus is more on Middle East oil producing countries.

**Morocco (Morocco):** This new chapter also explains the content of Islamic finance trying to adapt it to existing standards.

**Perú (NATIONAL):** We agree with the scheme proposal we suggest having a compilation guide of Islamic finance.

**South Africa (South African Reserve Bank):** This chapter will benefit countries' compilers with little experience of of this topic.

**United Kingdom (Bank of England):** Having worked as part of the IFTT, the measurement of FISIM was still to be agreed. has that now been finalised so in a position to include in the initial draft?

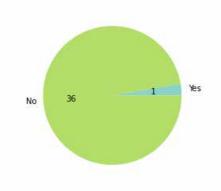
**United States (FRB):** Consider retaining the consecutive grouping of chapters on Insurance and pensions; Selected issues on financial instruments; and Contracts, leases, licenses and permits. Consider moving Islamic finance chapter down to chapter 27 or up to chapter 24.

# SNA Chapter 29 - Financial corporations (CONSENTERS)

A total of 38 respondents contributed to this consultation, 30 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> <u>graphs reflect the answers of all 39 respondents.</u>

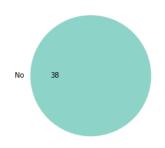
Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:

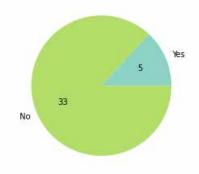


#### Netherlands (Statistics Netherlands (CBS)): Yes

It would be useful if this chapter discusses which (parts of) the financial subsectors can have net operating surplus, net savings and net worth. For instance, for the central bank and money-market funds output is calculated as sum of cost, so net operating surplus should equal zero. For most investment funds this also applies, but not for funds investing in real estate. For money-market funds, investment funds and defined contribution pension funds, all savings are attributed to its participants so net saving is zero. For net worth something similar would be expected were it not that the difference in valuation between loans and equity gives rise to a net worth. Discussion on this helps understand how data on these subsectors should be included in the national accounts. 2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary?2B. If yes, please elaborate:



3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



#### Georgia (National Statistics Officed of Georgia): Yes

Non-bank financial intermediation and digression on Fintech - It is desirable, that identify the appropriate description of the broader context that will be reflected in the SNA. It will be great expand and clarify the discussion using examples that illustrate the sequence of accounts entries under different situations.

#### Indonesia (Statistics Indonesia): Yes

Will the output measurement in chapter IV also review volume measurement/estimation?

#### Israel (Central Bureau of Statistics): Yes

Part IV is not clear enough. It includes several different topics. Is there any significance in looking at all sections S123-S129 together ? Is shadow banking relevant to all the above sub sectors ? How does the braking down of the insurance sector and the pension sector connect to chapter 24 ?

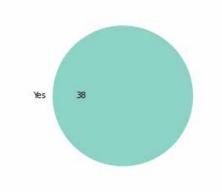
#### South Korea (Bank of Korea): Yes

Will the new supplementary breakdowns of NBFIs apply to FSB's annual NBFI monitoring exercise?

#### United Kingdom (UK Statistics Authority): Yes

The UK observes that splitting insurance into life and non-life, and pensions into DB and DC, can be problematic from a practical rather than a conceptual perspective as many insurance companies do both. The UK also wishes to highlight that there are hybrid pension schemes that need to be accounted for.

4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate?4B. If no, please elaborate:



5. Do you have any other comments on the Annotated Outline for this chapter?.8 Canada (Statistics Canada): I appreciate the specific section on non-bank FI.

**Indonesia (Statistics Indonesia):** Is it possible in this amendment to the 2008 SNA to review recommendations for calculating output and also estimating the volume of financial establishments at the regional level where financial statement data for that level are not available?

**Perú (NATIONAL):** Tell a guide to the capture collection templates of non-bank financial intermediation.

**South Africa (Soth African Reserve Bank):** Section III mentions that there will be an expansion on the details of financial corporation types and specifically a descriptive analysis of their functions. Would there be guidance/clarity on making a distinction between financial auxiliaries' activities discharged on behalf of clients and those of proprietary nature (i.e., own funds)?

**United Kingdom (UK Statistics Authority):** The UK is pleased to see links being made to the Data Gaps Initiative and as it relates to Non-Bank Financial Intermediation, but as per our comments on other chapters there is a key question in terms of the degree the proposed content appears to duplicate existing guidance.

The UK is most pleased to see discussion on the functions of Financial Corporations as it can be hard to classify them into subsectors without detailed guidance. Similarly, text on FinTech is welcomed but the UK wishes to stress the importance of detail here. This issue needs to be managed carefully as in some cases it will only be a mode of supply change (doing old things in new ways) but in other cases they could be doing new things entirely.

The UK identifies an additional link that could be made to Chapter 37: whom-to-whom tables and the pivotal role that good information on the financial sector, including correct classification of instrument and sub-sectors, plays in the presentation of whom-to-whom tables.

**United States (FRB):** 1. This chapter completely subsumes the old chapter on Links with MFS – users and compilers may wonder where this content has gone or have difficulty finding it. It may be worth considering a full chapter on links to various other statistical manuals MFS, GFS, BPM. Alternatively, additional discussion of the differences across manuals in the introductory chapter could work.

2. Both here and in chapter 28 on Nonfinancial corporations, in would be useful to discuss the distinction and differing treatment of equity REITs and mortgage REITs clearly - as well as the difference between a REIT as an equity financial instrument and a REIT as an institutional unit that holds a portfolio of assets.

## SNA Chapter 34 - Measuring well-being (CONSENTERS)

A total of 29 respondents contributed to this consultation, 25 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> graphs reflect the answers of all 29 respondents.

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



Mexico (National Institute of Statistics and Geography (INEGI)): Yes

Include the measurement of gender equity. Include measurement of violence in all its types. Include measurement of access to housing and financing.

#### United Kingdom (UK Statistics Authority): Yes

As noted in the UK's response to Chapter 2, there is next to no subjective well-being measures referenced. The UK believes this chapter could benefit from a more explicit discussion as to how these approaches differ but may also complement each other. The UK sees the starting point for this chapter as for references to an accounting-based framework. However, if the intention is for the starting point to measure what matters more explicitly, then this could one to linking and measuring subjective well-being and hence makes it relevant to this chapter.

It would be beneficial for this chapter to distinguish objective and subjective well-being in order to clearly show which aspects of well-being do fall into the SNA's remit.

The UK also wishes to raise that in the section on boundaries, should volunteering and

leisure be flagged as individual categories for discussion – both have very strong links to well-being in the literature.

#### United States (FRB): Yes

In the Schematic overview, section II, "Using the SNA to measure the distribution of income and consumption", "wealth" should be added: "Using the SNA to measure the distribution of income, consumption, and wealth".

#### Clara van der Pol: Yes

In the section "Supporting broader measurement of wellbeing", tourism should be added in the list of key topics. Wellbeing has been recognized as a social effect of tourism in the Statistical Framework for Measuring the Sustainability of Tourism (see its chapter on the social dimension:

https://webunwto.s3.eu-west-1.amazonaws.com/s3fs-public/2022-12/SF\_MST\_EG\_review\_Ch\_4\_draft.pdf).

#### 2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary? 2B. If yes, please elaborate:



#### Germany (Federal Statistical Office (Destatis)): Yes

'- Non-use values have been and remain a foreign matter in (national) accounting. We would like to see the topic as clearly distanced.

- Even more important: Terms like "decent work" might be voguish in modern societal talks but still are uncurable normative and do not belong to an intended positive system like national accounting. The same holds for "weighting choices in composite indicators" – pure value judgements.

#### United Kingdom (UK Statistics Authority): Yes

As per the UK's comments on Chapter 2, the UK strongly encourages that the editorial team consider a streamlined proposal in which Chapters 2, 34, and 35 might be better addressed in a single consolidated chapter which can address all of this material in a seamless articulation. Very simply, the UK believes that if chapter 2 can lay out the core aspects of this area succinctly, it is unnecessary for two more chapters, especially when this would, in

effect, devote one tenth of the manual to a topic that chapter 2 argues is related but not central to the SNA's mission.

The UK questions also whether there is significant benefit to discussing extended accounts in isolation from the role they allow in extending beyond the production and asset boundaries to consider wellbeing. Given the relatively thin proposed content of this chapter, the UK encourages the editorial team to consider merging this chapter with Chapter 34. Also, Chapter 34 and 35 appear thin and potentially duplicative with Chapter 2 and consequently impresses an extremely disjointed and poorly organised narrative experience for the user. If these themes were better grouped together, it would be easier to follow the logic and argument of the SNA. The UK recommends the proposed outlines for Chapters 2, 34, 35 and 38 be carefully reconsidered.

3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



#### Australia (Australian Bureau of Statistics): Yes

There are a couple of points listed below which are unclear:

- The term "decent work" and how this fits in the SNA and how we would measure this in the context of the SNA

- It is not immediately clear what is meant by the inclusion of non-market digital services in the context of measuring wellbeing.

- There is also confusion as to why consumer surplus in mentioned. The National Accounts are not concerned with consumer/producer/government surpluses.

#### Germany (Federal Statistical Office (Destatis)): Yes

'- A clear definition that defines and delineates wellbeing is missing at the beginning of the chapter.

The choice of topics defined in the Schematic Overview in section III is unclear (what does unpaid household services, health care and non-market digital services have in common and how are they linked to wellbeing?)

- Moreover, it is not fully clear which data on wellbeing will be part of SNA (core) accounts / extended accounts / thematic accounts or supplementary tables. Thus, the section 3 may

not always be easy to understand.

- The AO could give impression of some ranking, i.e. that SNA (core) accounts, (i.e. what will be within the SNA boundary) will provide the most important data on wellbeing (section 2), while other, supporting (like secondary, from the broader framework) data are covered by section 3. This distinction is consistent from the SNA perspective (how the system is built – what are core measures and what other/ broader measures), irrespective of the fact that any/all data on wellbeing may be equally important or their importance may depend on the user perspective / needs.

- Further, we cannot recall that composite indicators (including weighting choices) would have been explicitly discussed in some WS GNs. As we are not in favor of composite indicators (we prefer dashboards), could this issue be clarified?

#### South Korea (Bank of Korea): Yes

In sections of the Section.3 'Supporting broader measurement of wellbeing' (page 2), it says 'This includes discussion of : The structure of relevant tables and accounts including templates for linking to various

parts of the SNA accounts such that the development of integrated datasets can be supported.' What is specific meaning of "integrated datasets"? What do they include?

#### United Kingdom (UK Statistics Authority): Yes

The UK wishes to raise concern that Section 4 highlights 'challenges surrounding the valuation of non-market outputs in a manner consistent with SNA valuation principles'. This includes consideration of the treatment of consumer surplus and links to the proposed discussion of valuation in Chapter 3.

The UK is strongly supportive of the approach contained in SNA08, including the application of quality adjustments for volume indicators. It appears the only guidance note which addresses this point is section 3.5 of 'Price and Volume Measurement of Goods and Services Affected by Digitalisation' which noted that the current approach should be supported and brought into more general application, which was subsequently approved by the AEG.

The UK is therefore unclear of the impetus or benefit of this section, or the basis upon which any revision would be formulated. The UK recommends that a guidance note on this topic be tabled for global consultation if an approach deviating from that contained in the agreed guidance note as discussed above is being considered.

#### United States (FRB): Yes

Section 3 – Key topics, second bullet: what is meant by "decent work"? Clarification is needed here.

#### Kieran Walsh: Yes

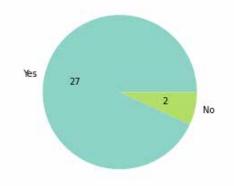
We are somewhat unclear on the following paragraph on page 3:

"There are a range of topics to be considered in describing the potential boundaries for measurement in an SNA context with respect to a broader concept of wellbeing. These often inter-related topics include: o Own-account household production o Forms of work – covering paid and unpaid work o Informal and non-observed economy "

We are likely to have observations on these points but for the moment they have not been elaborated and the intention (for example of referring to informality in this chapter) is unclear for the timebeing - also the term 'own-account household production'. As indicated in previous comments and relating to the chapter on labour we think it's a good idea to refer to the ICLS standards where possible and, if there are necessary differences in concepts explain them transparently. We have also given inputs to preceding drafts of content on unpaid household service work which we hope will be reflected in the draft chapter.

In addition we are unclear on the reference on page 5 to "Measurement of aspects and characteristics of decent work". While in general we see the value is discussing the linkage between well-being and decent work as it has not yet been elaborated and wasn't covered in outputs from Task teams to our knowledge it's unclear what may be covered here.

4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate?4B. If no, please elaborate:



#### Germany (Federal Statistical Office (Destatis)): No

Some issues mentioned in this AO were not elaborated in the WS GNs and would deserve some more explanations.

#### 5. Do you have any other comments on the Annotated Outline for this chapter?

**Australia (Australian Bureau of Statistics):** We note the importance of highlighting the distinction between output and outcomes, it is important the context of measuring non-market activity.

Canada (Statistics Canada): Comment on content: Issues in the measurement of wellbeing section

Given that many of these variables will be difficult to estimate due to a lack of reliable data, such as more detailed consumption surveys and low response rates for time use surveys, it would be useful for this section to include guidance on alternative data sources that can be used for measurement (or somewhere else in this chapter).

**Canada (Statistics Canada):** Issues in the measurement of wellbeing section Given that many of these variables will be difficult to estimate due to a lack of reliable data, such as more detailed consumption surveys and low response rates for time use surveys, it would be useful for this section to include guidance on alternative data sources that can be used for measurement (or somewhere else in this chapter).

**Germany (Federal Statistical Office (Destatis)):** The links to additional GNs should be mentioned like DZ.3/DZ.4, CM.4 or IA.1 (while the global consultations for the two latter are still pending and the results could give new insight).

**Mexico (National Institute of Statistics and Geography (INEGI)):** Approach the issue of the impact of tax havens on the welfare of countries

**South Korea (Bank of Korea):** (1) 'Accounting for non-market digital services' which is included as a key topic in section 3 may have not been covered in the Well-being section of the 'List of Guidance Notes for the 2008 SNA Update' on UN ISWGNA webpage. Before this topic included in chapter 34, the relevant details had better be shared on the Well-being section of the webpage explicitly.

(2) This chapter includes a wide variety of topics that is insightful. When it comes to the actual implementation and application, however, the feasibility of each topic could be questionable. We may be able to prioritize topics and only adopt those with high feasibility, leaving others as suggestions (eg. As annex)

**United Kingdom (UK Statistics Authority):** As outlined in the response to Question 2B above, if the intention is not to go into this depth, then the case for three chapters on this topic appears thin and the UK again highlights that this material would be better presented as a single consolidated chapter.

As the UN Network of Economic Statisticians develops and firms up its agenda, the UK would recommend cross-referencing to their work as this progresses.

**Kieran Walsh:** Reflecting the comments under 3B we look forward to seeing a draft of the chapter as some of the references in the outline make the scope sound very broad and it's not clear how some of the points mentioned will be addressed.

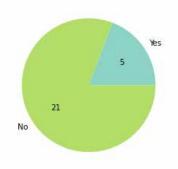
**Clara van der Pol:** In the Guidance Note WS.5 table 12 on healthcare, expenditure classifications need to include non-resident visitors in Exports.

# SNA Chapter 35 - Measuring sustainability (CONSENTERS)

A total of 26 respondents contributed to this consultation, 22 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> graphs reflect the answers of all 26 respondents.

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



#### Germany (Federal Statistical Office (Destatis)): Yes

A better heading for the chapter. For details please see our answer concerning question 5.

#### Netherlands (Statistics Netherlands (CBS)): Yes

• 2. Defining asset boundaries for the measurement of sustainability : Why only discuss

- here 'Ecosystem assets and services' and not environmental assets as defined in SEEA CF?
- Extension of the production boundary in SEEA EA should be discussed somewhere (probably chapter 34?).
- 4: Measurement of ECOSYSTEM capacity and ECOSYSTEM resilience

#### Perú (NATIONAL): Yes

More precision is needed on the sustainability of well-being, apparently the entire development of the chapter is based on environmental sustainability.

#### United Kingdom (UK Statistics Authority): Yes

The UK wishes to raise the following issues with the chapter:

1. The UK acknowledges that the SNA team have explicitly said they do not wish to define well-being. However, the UK maintains that an early definition and/or consistent use of

terms is necessary in the discussion of sustainability and well-being.

2. The importance of non-convexities in nature and human capital investment needs to be addressed.

3. The use of estimated present values based on assumed sustainability somewhat undermines the chapter and dismisses the complications of projection.

4. Complexities of marginal and total capital value - The total value is based on the current marginal trade prices. The UK wishes to highlight the issue that if those prices rise, the total value may also rise, but that could be a reflection of scarcity.

5. Market prices vs accounting prices – The UK emphasises the need to internalise externalities as the main driver. To exclude them inhibits usefulness as values can appear low and the accounts should be able to show wider impacts.

6. Flow vs relative scarcity.

7. A discussion of the blurred lines of the production boundary: a flow is in if managed and not otherwise (from a natural capital perspective). This is not a true reflection of the importance of those resources. For example, a fishery in a developed nation controlled by quota markets would be within the boundary, a foreign vessel taking fish from a nation unable to properly police its waters would not – though in truth it is taking resource from another nation at zero price which will show up in its own accounts.

8. The challenges of estimating degradation for many Natural Capital Assets.

9. The overlap, duplication and potential knock-on considerations for valuation and measurement in sub-section 4 between the different capital assets. For example, by valuing the effect of certain environmental assets with the loss of human health, which would also impact on certain human capital assets equally. This related to the market prices v accounting prices point above.

#### Clara van der Pol: Yes

In the key topics to be discussed under the "Measuring environmental sustainability", it would be useful to include biodiversity and the ocean economy. Both represent key topics of policy concern, and both count with an underlying measurement framework.
To cover well of the dimensions of sustainability, the chapter should include the measurement of social and economic sustainability, in the same way that it covers the environmental sustainability.

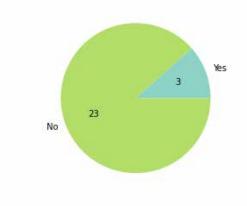
As indicated in the comments for Chapter 2, the "Statistical Framework for Measuring the Sustainability of Tourism" could be referenced in this chapter (either in part I or iv) as an example of a holistic and integrated framework covering the social, economic and environmental dimensions of sustainability for a specific sector. This could be placed under

the section of "Overview of other statistical frameworks for the measurement of wellbeing and sustainability". The Statistical Framework for Measuring the Sustainability of Tourism is currently under development, but it is expected that finalization will take place throughout 2023 and will be presented at the 2024 UN Statistical Commission for endorsement. This fits nicely with the planning of the SNA revision.

More information on the Statistical Framework for Measuring the Sustainability of Tourism is available at:

https://www.unwto.org/tourism-statistics/measuring-sustainability-tourism

2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary? 2B. If yes, please elaborate:



#### Germany (Federal Statistical Office (Destatis)): Yes

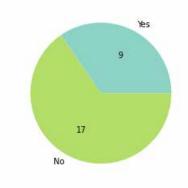
The annotated content "aggregation (...) of sustainability indicators, including net measures of income and wealth adjusted for depletion and degradation" (page 3) bears the risk of highly normative measures. The discussion should be left out or contain clear caveats.

#### United Kingdom (UK Statistics Authority): Yes

The UK again highlights, given the slimline proposal for this chapter, whether Chapters 2, 34, and 35 may be better addressed in a single consolidated chapter which addresses all of this material in a seamless articulation. If these themes were better grouped together, it would be easier to follow the logic and argument of the SNA. Very simply, the UK believes that if chapter 2 can lay out the core aspects of this area succinctly, it is unnecessary for two more chapters, especially when this would, in effect, devote one tenth of the manual to a topic that chapter 2 argues is related but not central to the SNA's mission.

The UK wishes to draw attention to some confusion in the title – what is being referred to is, actually 'measuring sustainability OF well-being' which is distinct from simply the focus of the annotated chapter on measuring sustainability. The UK therefore recommends revision of the chapter title, should it remain separate.

3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



#### Australia (Australian Bureau of Statistics): Yes

The title of the chapter can be a little confusing and changes from place to place. Appreciate that the title of "Measuring the sustainability of wellbeing" is likely intended to confirm the focus on environmental and wellbeing based sustainability rather than financial sustainability for example, but suggest that the more simple and often used title of "Measuring Wellbeing" would be simpler and less confusing.

#### Germany (Federal Statistical Office (Destatis)): Yes

'- The notion (or clear definition) of sustainability should be explained here (or in chapter 2) to avoid misunderstandings or false expectations. Up to now a clear definition is missing. If only environmental aspects are covered in the chapter, it should be named as in environmental (economic) accounts.

- Although the so-called social capital may be represented by some indicators, its measurement in a form of assets has not yet been developed and the topic should be rather addressed like "indicators of social capital".

- The section 3 on measuring environmental sustainability is not very clear; it includes accounting of flows and some economic activities. On the other hand, one could get the impression (from section 2) that sustainability should be addressed mainly from the assetperspective.

- The whole section 3 is reserved for environmental sustainability, it should be explained why (other forms of sustainability also exist like economic or social sustainability).

#### Israel (Central Bureau of Statistics): Yes

The proposal for this chapter is not clear enough.

Introduction, bullet 2 : using accounting-based approaches to support the discussion of sustainability; (ii) the measurement of the environmental-economic relationship using various accounts from the SEEA; and (iii) issues in the measurement of sustainability using accounting-based approaches.

Maybe at a later stage the draft will be more clear.

#### South Korea (Bank of Korea): Yes

First, definitions of environmental flows in Section II should be specified from diverse points of view. For example, a certain type of waste in country A might be an energy resource for biogas in country B. The SNA

needs to deal with these possible differences and suggest how to record the flows on each account to make between-country comparison available. Second, Section III should give clear guidelines for monetary valuation of the flows and resources using net present value methods in detail.

#### United Kingdom (UK Statistics Authority): Yes

The UK again advocates for the consistency of terms used.

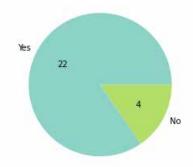
#### United States (FRB): Yes

The annotated outline title and text uses the phrase "the sustainability of wellbeing." To avoid confusing this chapter's topic (measuring sustainability) with the previous chapter's (measuring wellbeing), consider consistently using "sustainability" instead.

#### Clara van der Pol: Yes

There is no explanation on why the social and economic sustainability are not – yet? – part of this chapter. Treatment of net measures (NDP, NNI etc) should be explained.

4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate? 4B. If no, please elaborate:



#### Germany (Federal Statistical Office (Destatis)): No

Environmental sustainability will be elaborated in a separate section while other aspects of sustainability (social, economic) seem to be treated rather marginally: This may be for a reason but it should be explained why.

#### Perú (NATIONAL): No

The chapter is prioritizing environmental sustainability, although the sustainability of wellbeing can also be linked to the maintenance of a safe environment, income stability and continuous provision of basic public services, among others.

#### Clara van der Pol: No

The chapter only focuses on one dimension of sustainability, i.e. the environmental one.

#### 5. Do you have any other comments on the Annotated Outline for this chapter?.10

**Australia (Australian Bureau of Statistics):** It is appreciated that the focus of this chapter is on providing guidance on linking the SNA and the SEEA to aid in the measurement of sustainability rather than rehashing the guidance that is already provided in the SEEA into the SNA.

**Canada (Statistics Canada):** Similar comment to Chp 34 on source data and alternative data, guidance would be appreciated on alternative data when source data is not reliable.

**Canada (Statistics Canada):** Similar comment to Chp 34 on source data and alternative data, guidance would be appreciated on alternative data when source data is not reliable.

**Germany (Federal Statistical Office (Destatis)):** '- The title "Sustainability of wellbeing" is not suitable and highly confusing. Chapter 35 should focus on measuring (environmental) sustainability. It should be stated that SEEA (CF and EA) are independent statistical standards with equivalent relevance as the SNA.

- More generally, sustainability always involves competing goals and thus is subject to value judgments. However, since the SNA is not intended to make value judgments or express political priorities, but rather aims to establish accounting rules that are as objective as possible, it is questionable in our view whether there should be a new chapter in the SNA on the topic of sustainability at all. It remains to be seen whether individual (interim) results of the national accounts can be used as part of a sustainability assessment.

- In addition, we are not sure that terms like "strong and week sustainability", "critical natural capital", "planetary boundaries and integrated system approaches", "measurements of capacity and resilience", etc. have been so far (sufficiently) addressed within this SNA update and thus would deserve more explanations. They may give a hint to the danger that the authors tried to add too many popular and partly normative concepts to the SNA just to "get the hot stuff in". This may lead to e.g. either inappropriate value judgements or simple name dropping.

- Again, if "potential approaches to the presentation of data" (page 3) means making recommendations for communication: This should not be the aim of a SNA manual in our opinion.

**United Kingdom (UK Statistics Authority):** The UK would like to address that much of the contents of this chapter, such as how various measures should/could be interpreted in a well-being framework, cover topics which have not been covered as such through the standard SNA consultation process. Consequently, countries will only have minimal opportunities to comment, feedback and shape advice on what is an incredibly important topic area. The UK suggests that it should be made clear that the contents of this chapter are not comprehensive or definitive and are viewed as part of ongoing work internationally. In addition, the scope and detail of this section should be kept as close as possible to the guidance which has been discussed and affirmed as part of the consultative process for

other topics (for example, on the depletion of natural resources).

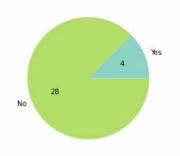
In addition, as noted in our response to Question 2B, if the intention is not to go into this depth, then the case for three chapters on this topic appears thin and the UK maintains that the material would be better presented in a single consolidated chapter.

# SNA Chapter 37 - From whom-to-whom tables and related financial analysis (CONSENTERS)

A total of 32 respondents contributed to this consultation, 26 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> <u>graphs reflect the answers of all 32 respondents.</u>

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



#### Mexico (National Institute of Statistics and Geography (INEGI)): Yes

Including a section with recommendations for cases with no counterpart information and information gaps in the who-to-whom tables as is the case of financing received by households or corporations by sectors other than financial corporations (e.g. suppliers). In these cases, is it valid to use statistical techniques such as the RAS method or some method of difference reduction?

#### Singapore (Singapore Department of Statistics): Yes

While examples will be provided for the compilation of sequences of accounts FWTW basis, it will also be useful to discuss countries' experiences and challenges underying the compilation of FWTW accounts.

#### South Africa (Soth African Reserve Bank): Yes

Maybe include and discuss the visualization possibilities of FWTW tables under "related financial analysis". For example, the use of network graphs which visually highlight interrelationships

#### United Kingdom (UK Statistics Authority): Yes

The UK suggests that discussion on the best practice in the presentation of whom to whom in tables and charts would be a useful addition.

The outline measures the use of derivation in compiling these tables. As part of that, the UK suggests it would be helpful to consider when some of the derived detail might be overly sensitive / uncertain and if this may create risks around the quality of data that may make it unsuitable for the intended purpose.

2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary? 2B. If yes, please elaborate:



#### United Kingdom (UK Statistics Authority): Yes

The UK believes the content in this chapter is helpful, however, it could be beneficial to consider whether this information could be incorporated into other chapters rather than meriting its own chapter.

3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



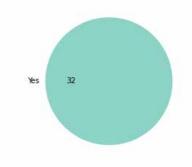
#### Austria (Osterreichische Nationalbank): Yes

the possible distinction between transactions in newly emitted bonds and already traded bonds

#### United States (FRB): Yes

"Nonfinancial accounts" is not a term in the existing SNA2008, nor is this term in the CM.2 Terminology and Branding of the Economic Accounting Statistical Standards. Consider utilizing existing terminology, or proposed new terminology, or providing additional content and clarification for "nonfinancial accounts".

4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate?4B. If no, please elaborate:



#### 5. Do you have any other comments on the Annotated Outline for this chapter?.11

**Israel (Central Bureau of Statistics):** Is a separate chapter necessary or can it be combined with the other relevant chapters.

**Mexico (National Institute of Statistics and Geography (INEGI)):** We have no additional comments.

**Perú (NATIONAL):** Regarding section V. Provisions, write-offs and loan provisions, in line with note WS.9 on the Record of Provisions, it will be very useful to have the examples to consider in this chapter, to have a better understanding of the adjustments of provisions that affect the financial accounts of the institutional sectors and which should be considered as memorandum items or accounts.

**South Africa (Soth African Reserve Bank):** The reconciliation of the financial and nonfinancial data because of different input source data is a problem. The confrontation of inter-sectoral disharmony of data poses significant problems. Adding some examples and suggestions on how to handle this would be very beneficial

**South Korea (Bank of Korea):** We think a detailed guide on how to develop the non-financial FWTW tables should be included in this chapter.

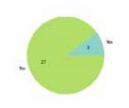
**United Kingdom (UK Statistics Authority):** The UK feels the examples proposed in the chapter will be helpful.

## SNA Chapter 38 - Thematic accounts (CONSENTERS)

A total of 30 respondents contributed to this consultation, 26 of which consented to the publishing of their verbatim responses which are provided below. <u>However, the below</u> graphs reflect the answers of all 30 respondents.

Completely anonymous contributions are excluded.

1A. Is there anything missing from the Annotated Outline for this chapter? 1B. If yes, please elaborate:



#### Israel (Central Bureau of Statistics): Yes

The new chapter provides clear and comprehensive explanations about the role of the thematic and extended accounts and presents the distinctions between these two types of the accounts and their connection to the "core" accounts. We were impressed with the Canadian note and the way it distinguishes between the Standard system of National Accounts, Thematic accounts and Extended accounts, using clear schematic presentation. It should be added to the chapter.

#### United Kingdom (UK Statistics Authority): Yes

The UK seeks clearer links between the purpose of extended accounts and the aims of Chapters 34 and 35 relating to well-being and sustainability.

The UK also suggests that the SNA would benefit from outlining some of the challenges involved in producing each thematic account. This would help statistical offices to identify areas where resource may be necessary, for example, new data source development/collection.

Moreover, there appears to be little reference to distributional household sector accounts (splits of household income, spending, saving and wealth) which are referenced in other chapters. Therefore, the UK suggests these topics should also be linked here.

#### Clara van der Pol: Yes

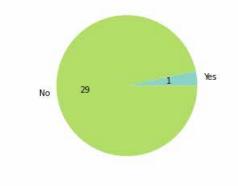
**I** The chapter does not explain the change of the name "satellite account" by "thematic

accounts". If the change goes beyond a mere name change, the differences should also be presented and explained.

In The Tourism Satellite Account (TSA) is the most widely implemented satellite account worldwide and as such deserves to be mentioned as an example (see the In-depth review of satellite accounting:

https://unstats.un.org/unsd/nationalaccount/aeg/2019/M13\_5\_2\_Review\_Satellite\_Accounting.pdf). In addition, 15 of the first 20 results on Google Scholar for the term 'Satellite Accounts' refer to TSAs (the others relate to Health, R&D, environment and meetings/conferences). Only one relates to a (1996) transport satellite account, yet the Chapter uses this as the only example. Recent data on implementation of the TSA is also available as part of the tourism related SDG indicator 12.b available at https://www.unwto.org/tourism-statistics/economic-contribution-SDG. And the key TSA aggregate, the Tourism Direct GDP, is an official SDG indicator for target 8.9.

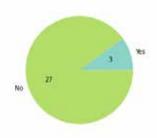
2A. Is there anything included in the Annotated Outline for this chapter that is unnecessary? 2B. If yes, please elaborate:



#### United Kingdom (UK Statistics Authority): Yes

The UK questions whether there is significant benefit to discussing extended accounts in isolation from the role they allow in extending beyond the production and asset boundaries to consider wellbeing. Given the relatively thin proposed content of this chapter, the UK encourages the editorial team to consider merging this chapter with Chapter 34. Also, Chapter 34 and 35 appear thin and duplicative of Chapter 2 and impresses an extremely disjointed and poorly organised narrative experience for the user. The UK recommends the proposed outlines for Chapters 2, 34, 35 and 38 be carefully reconsidered.

3A. Are there any aspects of the Annotated Outline for this chapter that are unclear? 3B. If yes, please elaborate:



#### Netherlands (Statistics Netherlands (CBS)): Yes

The terminology used is unclear, is an extended account the same as a satellite account?

Why is the thematic account on the digital economy explicitly mentioned and not others?

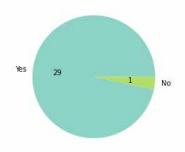
#### United Kingdom (UK Statistics Authority): Yes

The UK finds it unclear where the links between the thematic accounts are discussed. Lots of the themes are linked to the household account (education, health, etc). The UK argues it is important to detail these links to avoid double counting and to be aware of the comparability of different concepts and definitions used in each of the thematic accounts.

#### Clara van der Pol: Yes

The relation between satellite accounts with thematic and extended accounts.

4A. Is the balance of the proposed chapter as indicated in the Annotated Outline appropriate?4B. If no, please elaborate:



**United Kingdom (UK Statistics Authority):** No Please see the response to Question 2B.

#### 5. Do you have any other comments on the Annotated Outline for this chapter?.12

Australia (Australian Bureau of Statistics): The delineation between thematic accounts and extended accounts is well-framed.

**United Kingdom (UK Statistics Authority):** The UK would like to highlight that one of the sources incorrectly omits the UK from its list of producers of Satellite Accounts. The UK currently produces household, tourism and environmental accounts. Source: the in-depth review of satellite accounting produced by Statistics Canada (https://unece.org/statistics/ces/satellite-accounting).

**United States (Bureau of Economic Analysis):** Second to last bullet in section III references "a sequence of tables" to help illustrate steps. We assume these tables include Supply-Use tables and if not, should be explicitly referenced somewhere. We've found the development of SUT for thematic accounts to prove challenging.

**United States (FRB):** "Thematic and Extended Accounts" is the preferred title as it appears in the annotated outline document rather than in the list of chapters.