

# European

# MARINE BOARD

Advancing Seas & Ocean Science

## Feedback from the European Marine Board Secretariat to the European Commission's consultation on the New [Environmental Economic Accounts Modules](#)

(19 August 2022)

The [European Marine Board](#)<sup>1</sup> (EMB) Secretariat commends the European Commission's inclusion of Ecosystems and Environmental Subsidies to its Environmental Economic Accounts. However, we believe that these modules do not go far enough to address the policy questions highlighted in the 'Roadmap'. The lack of specific Marine Accounting will reduce the ability to address the EU's climate change ambitions, the 'Farm to Fork' strategy, the protection and preservation of biodiversity, the mainstreaming of sustainability in all EU policies and addressing the SDGs.

Specifically, the list of characteristics that Member States need to account for on ecosystem condition only refers to coastal beaches, dunes, and wetlands, but provides no guidance for marine ecosystems. However, given that the Exclusive Economic Zones of the EU countries is 4.5 times that of its total land mass area (including the overseas territories, and 77% of land mass for continental Europe), this seems insufficient. The ability of the European Seas and Ocean to help adapt and mitigate for Climate Change to carbon sequestration, and for the ability of feed Europeans through the 'Farm to Fork' strategy is not being considered. And without addressing SDG 14: Life below Water, the EU will not mainstream sustainability into all its Policies.

On regulating and maintenance services for global climate regulation, only reporting on sequestration of carbon by terrestrial systems excludes the very important carbon sequestration taking place in [blue carbon](#) systems<sup>2</sup>. Carbon sequestration by coastal vegetation occurs 40 times faster than in tropical forests and healthy marine ecosystems with sufficient Ocean predators are important to keep it that way [1]. Thus, keeping account of the carbon sequestered in the coastal Ocean, and the marine ecosystems that live in these ecosystems is critical to keep track of the regulating services they provide. The data collected under the Marine Strategy Framework Directive can and should be used to create more comprehensive Natural Capital Accounts of the Marine ecosystems. However, currently the provisioning

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<sup>1</sup> <https://www.marineboard.eu/>

<sup>2</sup> <https://www.thebluecarboninitiative.org/>

accounts seem to only take account of terrestrial crops, and do not seem to include any food provision from the Ocean.

The objective of Ecosystem Accounts in Annex IX highlights the need for using earth observations, environmental reporting, and other data sources to create the accounts. However, in the Ocean the observations to record the extent of the ecosystems, the conditions of these ecosystems, or the flow of services from these ecosystems do not always exist and are not well coordinated. The current DG MARE initiative on “Ocean observation – sharing responsibility” will enable the coordination of the observations needed to record the extent, condition, and flow of services from Ocean ecosystems.

While the proposal mentions cultural services, it does not account for the links between ecosystems and human health benefits.

Finally, as highlighted in the EMB Future Science Brief on Valuing Marine Ecosystem Services [2], there are issues with the implementation of the UN’s SEEA concerning spatial scale, boundaries and aggregation of data, specifically with regards to marine ecosystems. In the Ocean there is often a mismatch between the place where the services are supplied and where the benefits accrue, or demands are made. The Future Science Brief recommends that issues such as scale, aggregation and ecosystem degradation should be addressed to facilitate their inclusion in Natural Capital Accounting.

#### **References:**

1. Atwood, T.B., et al., *Predators help protect carbon stocks in blue carbon ecosystems*. Nature Clim. Change, 2015. **5**: p. 1038-1045.
2. Austen, M.C., et al., *Valuing Marine Ecosystems - Taking into account the value of ecosystem benefits in the Blue Economy*, in *Future Science Brief 5*, J. Coopman, et al., Editors. 2019, European Marine Board: Ostend, Belgium. p. 32.