DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION
UNITED NATIONS

System of
Environmental
Economic
Accounting

Classification of Environmental Functions

Global Consultation

Comments Form

Extended deadline for responses: 3 February 2023
Send responses to: seea@un.org

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The comment form has been designed to facilitate the analysis of comments. There are three guiding questions in the form, please respond to the questions in the indicated boxes below. To submit responses please save this document and send it as an attachment to the following e-mail address: seea@un.org.

All documents can be also found on the website at: https://seea.un.org/content/global-consultation-classification-environmental-functions

In case you have any questions or have issues with accessing the documents, please contact us at seea@un.org

Question 1: Do you have any comments on the proposed structure of the Classification of Environmental Functions?

General Comments:

It is recommended that the Classification of Environmental Functions to the UNSD adopted Global Statistical Indicators on Climate Change. 1/

For borderline cases and environmental activities not elsewhere classified, it is recommended that the definition on climate change-related terms may be sourced out from Intergovernmental Panel on Climate Change's assessment report definition of terms 1/

Specific Comments

Class 1.1.3 Monitoring, measurement and similar
  We suggest Class 1.1.3 to be rephrased into "Monitoring, measurement, *assessment*, and similar" 2/

The same changes, as cited above, to be applied to CLASSES 1.2.4, 1.3.3, 2.1.5, 2.2.4, 3.1.5, 3.2.6, 4.1.5, 4.2.3, 4.3.3, 5.1.2, end 5.2.3. 2/

Group 4.2. Protection of Biodiversity and Landscape
  To consider human encroachment. 3/

Class 4.2.2. Protection of Natural and semi-natural landscapes
  Data on natural and semi natural landscapes is not available in the Philippine Setting. How about measures taken to minimize the impact of natural hazards and disasters to habitats and areas? 3/

Group 4.3 - Management of Forest Resources
Class 4.3.1 – Reforestation, afforestation and forest-related land management
  We suggest Class 4.3.1 to be rephrased into "Reforestation, afforestation, assisted natural regeneration and forest management practices". 3/
Class 4.3.2. – Protection against forest fires
  We suggest that Class 4.3.2 to be rephrased into "Protection against forest fires, pests and diseases". 3/
Class 4.3.3. – Monitoring, measurement and similar
  Expound the sentence on the 4.3.3. We suggest replacing it with "Monitoring, Measurement and other similar Forest Resource Assessments Techniques". 3/

Other comments:

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Provide classification/ level for land cover and land use which are primary concerns in environmental accounting and spatial analysis under the SEEA Framework, to include "land takes". 3/

Question 2. Do you have any comments on the explanatory notes and on the heading reference?

General Comments:

The explanatory notes are aligned with the concepts of the SEEA Central Framework. It covers environmental activities of industries as well as households. 4/

Specific comments:

Division 1. Air, climate and energy

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Definition: Activities, measures, and products aimed at reducing **and avoiding** air emissions and/or concentration of air pollutants, production of energy from renewables and at energy savings 1/

Inclusion: "It includes activities and measures related to reduction, **avoidance**, and control of air emissions…" 1/

Exclusion: Consider rephrasing this line as it contradicts CEF 1.2 on the production of RE. Use/Production of energy from RE can be considered as climate change adaptation. 1/

Group 1.1 Reduction and control of air emissions (excluding energy related measures)
For clarity, we suggest that "greenhouse gas" be added to Group 1.1. To wit: Reduction and control of air and ***greenhouse gas*** emissions (excluding energy related measure) 2/

(Note: While it is defined in the Explanatory Notes that this level includes measures and activities aimed at the control of emissions of greenhouse gases, air pollutants and gases that adversely affect the stratospheric ozone layer, revising the level to read as suggested would straightaway identify what this level covers.) 2/

Definition: Activities, measures, and products aimed at reducing **and avoiding** emissions into the ambient air or reducing concentrations of air pollutants. 1/

For coherence, we suggest that, the bullet of included measures and activities also be revised to add "GHG". To wit: 2/
- preventing air and *GHG* emissions through cleaner production processes and products 2/
- treatment of air and *GHG* emissions through end of pipe processes and equipment 2/
- monitoring air and *GHG* emissions 2/
- all other activities aimed at reducing air and *GHG* emissions including education, training, information 2/

Class 1.1.1 Prevention of Pollution
Definition: cleaner production processes and other technologies (cleaner and **low carbon** technologies) 1/

Inclusion: **use** electric and hybrid cars, buses and other cleaner and more **fuel**-efficient vehicles, including components (as specified in the Eurostat Guidance Note) 1/

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installation/establishment of charging stations and other essential infrastructure for recharging electric road vehicles 1/

Class 1.1.2 Treatment
- Consider including establishment of destruction of facility for ODS and HFCs. 1/
- Shifting to low-Global Warming Potential (GWP) refrigerants in the RAC industry. 1/

Class 1.1.3 Monitoring, measurement and similar
Consider including conduct of GHG inventory. 1/ 2/

Group 1.3 Energy savings and management

We suggest revising the 3rd bullet under list of included activities and products (on page 9 of CEF explanatory note) to read:
It includes:
- Activities and products concerning audit, monitoring and management (M&M) related to energy savings; 2/

Class 1.3.2 Energy efficient buildings; other efficient energy-demand technologies
We suggest revising the first paragraph to be particular that renovation of existing buildings should meet the required energy performance set by the existing laws. To wit:

Activities, measures and products aiming at minimising the consumption of energy through the **efficient** renovation of existing buildings and construction of energy efficient buildings as well as the use of other efficient energy-demand technologies.

(Note: The term efficient renovation was culled from the second paragraph under 1.3.2 on page 10 of CEF explanatory notes.) 2/

Division 2. Wastewater and water resources management
This should be aligned/reflect the provisions under the National Sewerage and Septage Management Program (NSSMP). 1/

Class 2.1.2 Sewerage Network
Definition: Activities, measures and products aimed at the operation, maintenance, repair, **and expansion** of sewerage networks. 1/

Class 2.2.1 Reduction of Intake Water

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Consider including use of RE for flood control and water management systems 1/

Class 3.1.1 Prevention of Waste Generation

Consider including use of RE for flood control and water management systems 1/

Class 3.1.3 Treatment (incl. preparatory) and disposal of hazardous waste

Consider including the Installation and improvement of disposal facilities (e.g. for methane flaring) 1/

Group 3.2 - Materials Recovery and Savings

Consider including installation of waste heat recovery 1/

Class 3.2.1 Wood and Paper

We suggest including the "generation of wastes from conversion and processing of wood" under the Exclusion items (prior to "collection, transportation and sorting of waste") as this correlates with by-products of utilization, and therefore may not be eligible as environmental function. 3/

Group 4.1 Protection of soil, surface and groundwater

Consider including implementation of soil management 1/

Group 4.1.1 Prevention of pollutant infiltration

Consider including implementation of proper soil management for agricultural lands 1/

Group 4.1.2 Cleaning up of soil and water bodies

Consider including use of tree species for bioremediation for soil and water bodies 1/

Group 4.3 - Management of Forest Resources

We suggest including the "preservation of forests stands for carbon stock assessment in relation to climate change mitigation" as this clearly contributes to the sustainable management of forests, whether in planted or naturally grown stands. 3/

Class 4.3.1 – Reforestation, afforestation and forest-related land management

Reforestation, afforestation and assisted natural regeneration are all different methods of forest management aimed at increasing the forest cover in a particular area. 3/

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- Reforestation is the establishment of forest plantation on temporarily unstocked lands that are considered as forest (FAO, 2001). 3/

- Afforestation is the artificial establishment of forest on land previously not covered with forest vegetation (FAO, 2001). 3/

- Assisted Natural Regeneration (ANR) is the process of rehabilitating denuded forest lands by taking advantage of trees already growing in the area. This usually involves the following activities: locating and releasing indigenous trees, maintenance, and augmentation planting and protection (DA0 1991-31). 3/

Class 4.3.2. – Protection against forest fires
- Threats in the forest ecosystem are not only limited to forest fires but also include pests and diseases. 3/
- Consider including conduct of foot patrolling inside forest areas 1/

Inclusion: "**establishment** and installing of firebreaks" instead of "manufacturing and installing of firebreaks" 1/

Class 4.3.3 – Monitoring, measurement and similar
- Consider "Timber evaluation for cultivated and natural timber resources" for "Timber evaluation" 4/
- Consider including GHG inventories 1/

Group 6.2 R&D for wastewater and water resources (CEF2)
Definition: R&D related to treating wastewater (up to environmental standards or quality norms) and at **safeguarding** stocks of water 1/

Other comments:

1. Under 1.1 page 5: Revise "monitoring air emissions and types of pollutants" 3/
2. Under 8 page 4: Wastewater and water resource management was not included 3/

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Question 3. Do you have any other comments on the Classification of Environmental Functions?

> ### 4.2.2. Protection of natural and semi-natural landscapes
> Are caves considered under this category? 3/
>
> **Other Comments:**
> 1. Revise Classification 1 into: Air quality and energy management. Climate may not be included as it is not included under the specifics. 3/
> 2. Under 2.2: Management of watershed must be included as they are the primary natural source of clean water. 3/
> 3. Under 7: May be revised into: Cross-cutting concerns and other activities 3/
> 4. Revise if suggestions under structure are considered. 3/
> 5. Classification of Environmental Protection Activities (CEPA) is a generic, multi-purpose, functional classification used for classifying activities, products, expenditure, and other transactions related to environmental protection. CEPA is complemented by the Classification of Resource Management Activities (CReMA) that breaks down environmental activities aimed at preserving and enhancing the stock of natural resources. If these two will be combined, there must be a harmonious classification or environmental domains (currently the CEPA Classes 1-7) and the critieria set by CReMA, not to mention the classification of environmental activities (CEA). 3/
> 6. It can be recalled that CReMA is used at the European level for the mandatory reporting of the environmental goods and services sector account (EGSS), as set out in Regulation (EU) while CEPA alone has the status of international classification. What will happen to the integrated functional classification of environmental activities (CEA) which envisioned to overrule CEPA and CReMA once adopted? 3/

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