



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](mailto:seea@un.org)

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|--------------------------------|---|
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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](mailto: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](mailto:seea@un.org)

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

Comments/Recommendations:

- Avoid using 'dots' in the coding scheme (e.g., 1.1.1). Our experience at StatCan over the years has pushed us to move away from codes with dots; one of the major issue is metadata interoperability and sharing using various IT systems such as SDMX. Even if we used these dots before, for any new classifications, we avoid them, including in some revision for example we removed them from our National Occupational Classification (NOC) which is a major classification for Canada.
- Avoid using the same title for the different codes. In a lot of cases, mutually exclusiveness principle is reflected by the codes and titles for statistical classifications. Looking for precision in the titles is always a best practice to follow. It would be better to add precision in repeated titles under various classes (e.g., 1.1.1, 1.1.3, 2.1.1, 2.1.5, 3.1.1, 3.1.5, 3.2.6, 4.1.5, etc.). If for example 1.1.1 is for air pollution, it is better to name the class 'Prevention of air pollution'.
- For title 'Monitoring, measurement and similar, it is not clear what is 'similar'? Similar activities? It would be better to be précised with 'similar' in combination of the comment above.
- The residuals are called 'Other activities' (including Division 7 title): is this always the case that it is about 'activities' (Activities or functions)? The classification seems to cover more than just activities (see the various definitions and the introduction). Also, since ISIC uses 'activities' as its main concept, if CEF covers something different than ISIC, it would be better to refer to more than just activities in the title of these residuals or categories.
- It would be better to make the title of Division 6 more précised or specific to CEF as R&D is already its own classification in many contexts that CEF will be put close to. Maybe call the Division 'Environmental Research and Development'? or 'Research and Development for environmental purposes'?
- Make the title of 1.1.2 more précised: 'Air treatment' for example, if it is only about air (see what is done with 2.1.3 and 2.1.4).

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

Comments/Recommendations:

- Avoid using exclusions with no target code/category as they are not very useful for users. Normally, when excluding something, we say where it goes or where it is classified.
- Avoid grouping many activities/products to be excluded at once if they have different targets codes (also if they have no target code at all). Exclusions help when they are simple and single targeting one code at a time. Use higher group level codes if the exclusions group many classes for example, or Division codes if the exclusions encompass many classes and groups, respecting/following the classification hierarchy to create these exclusions.
- If something is excluded because it is out of scope, it should be mentioned so that the rest of the exclusions should have target codes. It is possible that exclusions on existing classifications do not have target codes in their explanatory notes; this

does not make them part of best practices, as they should also try to apply this way of documenting exclusions (borderline cases, as they are known to be).

- Under 1.1.1 (and certainly elsewhere), it is mentioned an example: 'cleaner (adapted) products'. Is there a clear definition of what is a 'cleaner' product or technology? And also, 'efficient product'? Even other classifications or frameworks could benefit from CEF if there is a clear way of distinguishing/defining activities, technologies, process, products (goods and services) in what makes them 'clean' or 'cleaner' or 'more efficient' than one another.

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

In the introduction:

- Third paragraph, I would put 'designed' before produced and manufactured.
- Section 2 – Classification purpose and structure. The second principle was not that clear. Is it necessary to enforce it (for what I understood)?
- Maybe elaborate more about how the CEF aligns with general principles of a classification (UN guidelines) will be helpful.