



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?

Before commenting on the structure, an initial important comment is that the proposed renaming of the classification is inappropriate and will be meaningless to users of these data. The concept of Environmental Functions has a distinct meaning in environmental and ecosystem science and since many of the users of these data will be coming from that perspective, the new name can only serve to confuse. Even among statisticians, the concept of functions is poorly understood. I would strongly urge a return to applying the SEEA Central Framework's label of Classification of Environmental Activities as the union of CEPA and CREMA. Not only does it have a value of continuing the long-standing use of the term activities in these classifications but it reflects the endorsement of this label in the SEEA Central Framework in 2012.

In terms of the structure of the Classification, at the higher levels it seems to not reflect well the presentation of data that concerns the emerging environmental policy issues such as nature-based solutions, ecosystem restoration, climate adaptation, environmental markets and sustainable finance. It is these themes that are most prevalent in the current policy discussion. The proposed high level structure seems to reflect policy concerns that were significant some 20-30 years ago. While these are likely still important issues, the lack of balance to incorporate new issues at the higher levels has the potential (a) to mean that users are unable to source data of relevance to them; and (b) to make it more difficult for compilers to collate relevant data using the classification. Both of these potential outcomes should be avoided. To this end it is suggested an extensive discussion with the user community be undertaken to ensure the classification can support the compilation of statistics that are fit for purpose.

Specific notes on the structure are that:

- There is no mention of ecosystems and hence there seems little recognition that the environment is now commonly understood as a set of interacting components. As a result there is likely to be substantive confusion and overlap in the application of the classes 4.2.1, 4.2.2 and 4.3 (as one example)
- It is not clear why only forest resources are singled out for special mention as an ecosystem type – why not also include wetlands, marine ecosystems, coastal ecosystems, green and blue infrastructure. Overall, class 4 seems particularly poorly capable of organising data at the level of detail that will be required.

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

A few points on the explanatory notes:

- It would be highly beneficial if the explanatory notes could incorporate relevant concepts and definitions from the SEEA, IRWS, IRES and other environmental statistical standards. For example,
 - It is not clear that the term natural water resources (2.2) is something that is well defined in the standards. It is indeed perhaps a matter of considerable debate as to what constitutes a natural water resource and the following text seems to relate only to inland waters more generally. The general idea of the boundary that is evident in the proposed notes is potentially OK but without a conceptual basis in the accompanying standards this discussion becomes problematic from a measurement point of view.
 - The definition of waste under 3.1 should use the SEEA CF definition not the EU directive and the associated includes and excludes should also be checked and aligned with the SEEA CF as the international standard.
 - The discussion under 3.1.1 and 3.1.2 should not refer to the EU Water Framework Directive, nor 3.1.3 to the EU Directive on hazardous waste
 - The links to the Global Ecosystem Typology could be developed in section 4
- It would be useful to broaden the measurement related to forests to include the full range of measurement related to forests including carbon, species, etc. As presented the label forest resources is actually a misnomer and it should be timber resources. Again, the current framing seems to miss completely an ecosystem management based focus and rests on a framing of the environment in terms of specific components.

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

In work with colleagues at the ILO and UNEP in 2022, it emerged that the use of the primary purpose principle to allocate data to particular classes was not fully supported with a number of people complaining that this principle did not enable the appropriate measurements to be available for analysis. Their underlying issue is that in many instances the primary purpose of activities is not environmental and yet many activities have environmental impacts. While it may seem clear from a statistical point of view that some criteria is needed, it would be sensible to engage with the user community to understand more clearly their information requirements and to consider how any concerns can be addressed.