



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS  
STATISTICS DIVISION  
UNITED NATIONS



System of  
Environmental  
Economic  
Accounting

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## Classification of Environmental Functions

### Global Consultation

#### *Comments Form*

**Deadline for responses: 31 December 2022**

Send responses to: [seea@un.org](mailto: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](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 to Q.1 were shared with Eurostat in December 2022)*

We would like to have a better understanding of why it is proposed to include Forestry under Environmental Functions (**4. Soil, surface and groundwater, biodiversity and forest / 4.3 Management of forest resources**).

Forestry has been under Economic Affairs rather than Environmental Protection in COFOG and in that context it includes expenditures related to "...conservation, extension, and rationalized exploitation of forest reserves; supervision and regulation of forest operations and ... operation or support of reforestation work".

Is it the intent of Eurostat to also propose revising COFOG to align with the proposed CEF? Should COFOG Forestry (Class 70422) be separated from the COFOG Group 7042 Agriculture, Forestry, Fishing and Hunting it would have implications for time series that FAO collects in our Government Expenditure on Agriculture and Environmental Protection questionnaire (GEAQ).

Going forward, it would also have implications for IMF GFS COFOG and ECLAC collected series that we use to benchmark the accuracy of what countries include in the GEAQ. Moreover, we are concerned that many developing / emerging market economies with limited statistical capacity would probably have trouble revising historical series. Therefore, I would like to understand the relationship between the proposed CEF and COFOG.

Enclosed is a mapping between the proposed CEF and Environmental Protection expenditure under GFS COFOG, only Forestry appears to be problematic.

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

**1.2. Energy from renewable sources**

**1.2.1. Production of energy from renewable sources**

**Pg. 7**

Definition of the term fuel wood – for clarity it would be good to define whether this refers to wood used for direct conversion to final energy forms, or it encompasses all wood that is used for both production of woody biofuels.

E.g. according to FAO terminology (FAO, 2004: *UBET – Unified bioenergy terminology*): *Woodfuel consist of all types of biofuels originating directly or indirectly from wood biomass that includes fuelwood, charcoal and black liquor*

Available from: [https://www.fao.org/3/j4504e/j4504e07.htm#P569\\_37350](https://www.fao.org/3/j4504e/j4504e07.htm#P569_37350)

In FAOSTAT, Wood fuels is defined as following:

*As regards the commodities to be considered in wood energy accounting, woodfuels can be divided into four types of products: fuelwood, charcoal, black liquor and other.*

1864	Wood fuel	1.1	<b>WOOD FUEL (INCLUDING WOOD FOR CHARCOAL)</b>
1629	Wood fuel, all species (export/import)	1.1.C	<b>Coniferous</b>
1627	Wood fuel, coniferous (production)	1.1.INC	<b>Non-Coniferous</b>
1628	Wood fuel, non-coniferous (production)		Roundwood that will be used as fuel for purposes such as cooking, heating or power production. <b>It includes</b> wood harvested from main stems, branches and other parts of trees (where these are harvested for fuel) and wood that will be used for the production of charcoal (e.g. in pit kilns and portable ovens), wood pellets and other agglomerates. The volume of roundwood used in charcoal production is estimated by using a factor of 6.0 to convert from the weight (mt) of charcoal produced to the solid volume (m <sup>3</sup> ) of roundwood used in production. It also includes wood chips to be used for fuel that are made directly (i.e. in the forest) from roundwood. <b>It excludes</b> wood charcoal, pellets and other agglomerates. <b>It is reported in</b> cubic metres solid volume underbark (i.e. excluding bark).

Ref: <https://www.fao.org/forestry/34572-0902b3c041384fd87f2451da2bb9237.pdf>

### Pg. 8

- Definition of the term Biofuels
  - o Does the term include all biofuels, including solid, liquid and gaseous?
- Production of biomass to be further processed into biofuels
  - o Does this refer to agriculture and forestry activities (e.g. dedicated woodfuel plantations, dedicated energy crops)?
- Are the terms “fire wood” and “fuel wood” used as synonyms?

#### 1.2.2. Equipment and technologies for renewable energy

- Is equipment used for pre-treatment of biomass for energy production (e.g. equipment for bailing, chopping, drying of woody biomass and/or agriculture residues) also included in this group?

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

Click here and start typing (The length of your response is not limited by this text box.)