



DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION
UNITED NATIONS



System of
Environmental
Economic
Accounting

Classification of Environmental Functions

Global Consultation

Comments Form

Deadline for responses: 31 December 2022

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?

Some activities related to climate change mitigation are missing or not well placed in a specific class:

- It would be good to have Carbon capture and storage (CCS) & carbon capture and use as a separate class (or group), to distinguish it from other air pollution treatment. With regard to climate change mitigation it is important to keep it separate.
 - Activities primarily focussed on enhancing carbon sequestration should be identified. Carbon farming as an activity should be separately identified.
 - Activities primarily focussed on reducing emissions from peatlands (or other soils) should be identified.
- ➔ We advocate a separate group under 1 for these activities (other climate mitigation activities):
- 1.4.1 Carbon Capture and Storage
 - 1.4.2 Carbon Capture and Use (or together with 1.4.1)
 - 1.4.3 Carbon farming
 - 1.4.4 Activities focussed on reducing emissions from soils (e.g. peatlands)
 - 1.4.5 Other

In 3.2 Materials recovery and savings it would be good to distinguish some more important material categories. Below our proposal :

- 3.2.1 Wood and paper
- 3.2.2 Metal
- 3.2.3 Mineral (glass, stone, ceramics, etc.)
- 3.2.4 Plastic
- 3.2.5 Rubber
- 3.2.6 Textiles
- 3.2.7 Animal and vegetable (/plant) waste
- 3.2.8 Other materials
- 3.2.9 Monitoring, measurement and similar
- 3.2.10 Other activities (related to the recovery of materials)

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

- 1.2.3: Add text to clarify that these also include biomass installations and hydro electrical dams.
- Distinction between 4.2.1 protecting habitats and 4.2.2 protecting landscapes should be clarified.
- 4.2 excludes 'the recreational structures and spaces such as urban parks and gardens, golf courses and other sports facilities'. We advocate that the maintenance of urban green and protection of urban biodiversity is within scope of environmental protection and thus should be included in the classification. Urban green is also distinguished in SEEA EA. To keep it distinct from 4.2.2 a separate class may need to be distinguished.
- 4.2.2 Protection *and maintenance* of natural and semi-natural landscapes
- 4.3: add definition of forest resources. Exclude from 4.3: management activities of biodiversity in forests and protection activities for forests (4.2), carbon sequestration activities (1).

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

Statistics Netherlands very much welcomes the CEF classification which is a good improvement with regard to the CEPA and CREMA classifications. We would like to thank Eurostat and its taskforce for all the work done.