



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

Name:	Trine Randen
Organization & country:	Statistics Norway
Contact (e.g., email address):	tri@ssb.no

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?

Statistics Norway supports the proposed structure of the Classification of Environmental Function.

Where relevant, the classification should be aligned with the NACE revision.

Level III is helpful in identifying environmental activities and products, but should not be used for reporting due to the level of details required.

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

Yes, we have a general comment when it comes to products/processes that are “cleaner (adapted)” and “more efficient”, for example at 1.1 “preventing air emissions through cleaner production processes and products”, 1.1.1 “cleaner (adapted) products” and 1.3.2 “energy efficient appliances and machinery”. How to identify these processes and products should be clarified in the explanatory notes. This could potentially cause different reporting between countries. The definition of what is a cleaner/efficient product may also change over time. What happens when the cleaner and more energy efficient become standard, for example hybrid (in Norway, hybrid cars are viewed as more equal to a fossil car than an electric car) or electric cars. Should they still be considered environmental?

In several cases, what is an environmental function in one category is damaging (or potentially damaging) to another. For example fertilisation of forests (incl. in 4.3.1) may harm biodiversity. Should this be discussed or clarified? The same goes for grazing and red meat (example cattle and sheep, which also emits methane).

In Division 3: Does the CEF follow the WFD (Directive 2008/98/EC)? This is not clear. Under 3.1.1 (b) human health is included as a prevention, but this might go against the classification criteria saying that activities for other purposes than environment is out of the scope.

Some other smaller issues:

- Erosion is included in both 4.1.3 and 4.3.1.
- Organic farming (4.1.1) should be considered moved to 4.1.3.
- Grazing (4.1.1) has many purposes and could also be placed under 4.2.2.

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

No.