



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:	External Relations and Cooperation Unit
Organization & country:	Statistics Portugal
Contact (e.g., email address):	REC@ine.pt

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?

PT agrees with the proposed structure in general.

We have some specific remarks/ suggestions:

1. On the environmental domains (level 1 – 1 digit)
 - a. 3 PT suggests “Waste management and materials recovery”
 - b. 5 PT suggests “Noise, vibration and radiation”
2. On the environmental groups (level 2 – 2 digits)
 - a. 4.3 PT suggests adding the word “Sustainable management of forest resources“. In our opinion, only sustainable forest management should be considered environmental
 - b. 6.5 PT suggests “R&D for noise, vibration and radiation”
3. On the environmental classes (level 3 – 3 digits)
 - a. Level “Monitoring, measurement and similar” - Explaining this level of breakdown in this simple way (unrelated to level 2) leads to several breakdowns with exactly the same name. PT suggests adding the level 2 designation (Example: 1.2.4 Monitoring, measurement and similar, related to energy from renewable sources)
 - b. The same suggestion for level “Other activities”
 - c. 2.1.1 – PT suggests “Prevention of pollution from wastewater”
 - d. 2.2.1 – PT suggests “Reduction of the intake of water”
 - e. 3.1.1 – PT suggests “Prevention of pollution from waste”
 - f. 3.1.2 – PT suggests “Collection and transport of waste”
 - g. 3.2.1 – PT suggests replacing “Wood and paper” by “Forest-based products (wood, paper, cork, other)”
 - h. 5.2.1 – PT suggests replacing “Protection of ambient media” by “Environmental protection related to radiation”

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

The reference headings not always match with the proposed structure headings. They should be unified according to the proposed structure.

We have some specific remarks/ suggestions:

1. Item 2.2 – Replace “CEPA 4.1” by “CEF 4.1”
2. Item 3.1 – PT suggests adding trash bags in “It includes” - bullet “goods specifically aiming at waste management (e.g., trash bags, bins, containers, trucks for waste collection);”
3. Item 3.1 – Last item, replace “CEPA 5.2” by “CEF 5.2”
4. Item 3.2.1 – PT suggests adding cork in “It includes” – bullet “reuse forest products and by-products, for example: reuse of timber or cork products;”
5. Item 3.2.2 - PT suggests adding in “It includes” – bullet activities aimed at reducing scrap and the recovery of mineral based materials from waste streams. This

- includes the processing of metallic and non-metallic mineral materials waste and scrap and end-of-life products into secondary raw materials. For example:
- o extending the useful life period of the utensils and equipment used
 - o mechanical crushing or reduction of metal waste from used cars, washing machines, bikes, railway wagons etc.;
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6. Item 3.2.7 – PT suggests adding in “It includes” – bullet “ ETIGA activities not elsewhere classified linked to recovery of other materials;”
 7. Item 4.1.4 – Underline “It includes” - “It includes, if undertaken for an explicit purpose of prevention and remediation of soil and groundwater salinity:”
 8. Item 4.2.4 – Replace “CEPA 6” by “CEF 4.2”
 9. Item 4.3.1 – PT considers that the inclusion of fast-growing species for industrial exploitation (for example eucalyptus) should not be included
 10. Item 8., sub-item “1.2.5 Air, climate and energy; Energy from renewable sources; Other activities” – What is the meaning of I19 in the end of the sentence? “ETIGA activities should be reported here when they can be separated from other activities belonging to CEF 1.2 and from similar activities related to other CEF-domains+I19”
 11. Item 8., sub-item 23.1.4 Waste management; Treatment (incl. preparatory) and disposal of nonhazardous waste” - replace CReMA 1.3 by CEF 1.3

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

The Explanatory notes on the Classification of environmental functions is a Eurostat document. However, since this classification will be an international one, PT questions if the reference to a European Classification (NACE) should be maintained. In case it is maintained, it would be relevant to have a reference to the NACE version.