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?

No comments, we support the proposed structure.

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

We believe it would be useful to add a list of abbreviations used in the explanatory notes. Moreover it would be useful with some editing of the document for referencing to other section. For example In 3.1 under the list of what is excluded references are made to other sections. In some cases "see" CEF XX is used and in other cases "included" in CEF XX is used. In e.g. 3.2.2 under exclusion the reference to CEF XX is only in brackets. For clarity it would be helpful if the word "included" is used in all examples, if that is the correct reference, to have clarity on where it is actually included or if it is just mentioned elsewhere.

In 1.3.2 "Energy efficient buildings; other efficient energy-demand technologies" we believe it is not clear what the "other efficient energy-demand technologies" is made up of. The explanatory note mentions it includes "energy efficient appliances and machinery" but since there is no more information than this it will be difficult for data compilers to single out this category. Some more examples on which types of machinery this could include would be helpful.

In 3.2. we believe the word "substitution" needs to be better defined. It seems to be only used further under 3.2.2 Minerals and 3.2.3 Plastic. If there are no cases for substitution in Wood and paper and Textiles, perhaps it should only be mentioned where it is needed and at level III.

In 3.2.3 we are hesitant about including paper bags as an example of substitution. The technical nature of paper bags is not in our opinion to replace plastic bags. Substitutes for materials made of fossil fuel are indeed important but from the data compilation perspective rather impossible to estimate when they are substituting plastic bags, and to know where to draw the line. Are textile bags replacing plastic bags as well, and what about backpacks? We would suggest to only include substitution through bio-based plastic here.

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

No other comments.

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