



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*

**Extended deadline for responses: 3 February 2023**

Send responses to: [seea@un.org](mailto:seea@un.org)

Name:	Response coordinated by Joanne Evans
Organization & country:	United Kingdom Office for National Statistics
Contact (e.g., email address):	<a href="mailto:International@ons.gov.uk">International@ons.gov.uk</a>

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?**

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

Energy storage (under renewables) will be so significant and important that I think it should have its own sub-category. Also because it will be a mix of services and infrastructure with people lending their car batteries to the grid so could be quite complicated.

I wonder if there is a reason why is there no section for R&D for biodiversity conservation? Quite significant amounts of academic work are devoted to it.

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

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

The exclusion of historic monuments might be tricky from biodiversity and landscape protection. It's hard to say where, for instance, The White Horse of Uffington stops and the landscape and nature begin – as it is for the bronze age hill fort near it and countless others. As such the funding and other means of spotting this kind of activity is likely to overlap between built and natural heritage. This is particularly true more broadly in this area since the vast majority of landscape management is carried out by businesses which are primarily farms – we can only see the funding going to them – and perhaps the action plans.

Deer stalking would count as conservation under the culling definition. While the control of those species is aimed at maintaining the stock for further hunting. I'm not sure that this is sufficient to require a change. However, the guidance could specify "culling" to manage the wider landscape for biodiversity rather than to specifically manage the species for further exploitation. Such a change might be contentious but so would leaving it as it is.

A significant proportion of the private work done on biodiversity protection in a developed country will be ecological surveys to reduce the impacts of development. It probably deserves a specific mention in the explanatory materials.

**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.)