



Make CountEmissions EU fit and work for Freight Transport!

Brussels, 4th March 2024 – The undersigned associations representing transport operators and users of freight transport services welcome the European Commission proposal aimed at establishing a common European framework for calculating GHG emissions of transport operations in the freight and passenger transport sector, the so-called CountEmissions EU initiative.

We believe that much can be achieved to support the transport and logistics sector to reduce its emissions but only with the correct market-based and supportive instruments. As such, this Commission initiative would enable transport operators to accurately calculate, monitor and compare their emissions giving transport users an estimate of the carbon footprint for their different transport and delivery options, facilitating behavioural change.

However, the compromise amendments negotiated ahead of the upcoming joint vote in the European Parliament's TRAN and ENVI Committees on 4 March, raise serious concerns over the practicality and effectiveness of the Regulation, which would increase administrative burden and discourage companies from calculating the GHG emissions of their transport services.

The undersigned associations are deeply concerned over the possible introduction of a life-cycle methodology to calculate and report GHG emission from transport, taking emissions from vehicle manufacturing, maintenance and end-of-life into account. We would like to remind MEPs that a difference should be made between emissions from transport services (in the scope of CountEmissions EU) and the full carbon footprint of a company, which may include GHG emissions beyond the transport services. The well-to-wheel approach adopted by the ISO 14083 standard reflects the current business practices of companies calculating and reporting emissions stemming from transport. At this time, there is no robust methodology to include emissions other than stemming from the provision of transport services. Developing a robust methodological approach would take a certain time, which would delay even further the uptake of GHG calculation in transport. Therefore, we recommend MEPs to maintain the CountEmissions EU methodology as proposed by the Commission, and as in line with ISO 14083 methodology.

Most political groups also agree to mandate the use of primary data by companies in the GHG calculation, with the exception of SMEs. We understand and strongly support the fact that primary data should be prioritised for calculating GHG emissions from transport services whenever available, but it should not be made mandatory, considering the difficulty for some stakeholders to generate or gather real-time data. The use of secondary data and default values should be possible to increase the uptake of GHG reporting in the sector; at a minimum for all subcontracted operations (not just for subcontracted operations to SMEs). On the other hand, we would be in favour of any EU or national incentives aimed at stimulating the use of primary data.

Overall, CountEmissions EU should be seen as a practical tool to help companies in calculating and reporting GHG emission of their transport services. We therefore call on Members of the TRAN and ENVI committees to make this a reality and refrain from imposing unnecessary burden on transport companies willing to calculate and report their GHG emissions, which ultimately provides greater levels of transparency to end users and customers.

CLECAT

European Association for
Forwarding, Transport,
Logistics and Customs Services

ESC

European Shippers' Council

EEA

European Express Association