



Make CountEmissions EU fit and work for Transport!

Brussels, 9 April 2024 – The undersigned associations representing transport operators, users of freight transport services and truck, bus, van and passenger car manufacturers 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 significant progress can be made in supporting the transport and logistics sector to reduce its emissions. However, this can only happen with the implementation of appropriate market-based and supportive instruments. As part of this Commission initiative, transport operators would have to accurately calculate, monitor and compare their emissions. This information would provide transport users with an estimate of the carbon footprint associated with various transport and delivery options.

In this context, however, some amendments adopted by the European Parliament's TRAN and ENVI Committees on 4 March mandate the Commission to present a report to the European Parliament and the Council setting out a methodology to calculate the life-cycle greenhouse gas emissions of all transport modes, particularly emissions stemming from manufacturing, maintenance and disposal of vehicles. The introduction of the calculation of the emissions from vehicle manufacturing, maintenance and end-of-life as proposed by the TRAN and ENVI Committees expands the scope of the Commission's proposal, which goes beyond the calculation of emissions from transport services.

Given the ambition of this methodological approach and the potential administrative burden it could entail for companies, the undersigned associations express deep concern regarding the amendments tabled for the Parliament's plenary vote, requesting the Commission to adopt a delegated act establishing the methodology for life-cycle emissions 24 months after the legislative text comes into force. While delegating powers to the Commission, this proposal would not only pre-empt the work done on Life-Cycle Assessment (LCA) at UNECE in Geneva but also creates legal overlap with other legislation related to LCA developments, such as the review of CO2 standards for Light-Duty Vehicles (LDVs) and Heavy-Duty Vehicles (HDVs).

Therefore, ahead of the Parliament's Plenary vote on the CountEmissions EU proposal on 10 April, **we strongly advise Members of the European Parliament to reject plenary amendments 108, 109, 114, 118, 120, 121.**

ACEA

European Automobile
Manufacturers
Association

CLECAT

European Association
for Forwarding,
Transport, Logistics
and Customs Services

ECG

The Association of
European Vehicle
Logistics

ESC

European Shippers'
Council