POSITION PAPER – 31 October 2023

Proposal for a Regulation on the accounting of greenhouse gas emissions of transport services (CountEmissions EU) (COM(2023)441)

Summary

ERFA welcomes the inclusion of the new CountEmissions EU Regulation inside the Greening Freight Transport Package. Allowing economic actors to know how much CO2 emissions are generated by transport services is indeed a key element to decarbonise freight transport as the less polluting modes and services will be better highlighted.

ERFA believes that while there are numerous positive elements, there remains some issues where clarifications and more ambition is needed for the Regulation to better reach its aim. Carbon reporting should be made mandatory for all transport operators while co-legislators should also introduce uniform and self-explanatory tools to communicate the data to shippers, for instance via a carbon labelling.

Positive aspects

The release of the proposal for a Regulation on the accounting of greenhouse gas emissions of transport services is, in general, positive for the transport sector. Railway companies have been for years favourable to CO2 emissions **reporting tools**. They are also confident that a significant number of shippers are willing to choose the greenest modes of transport once they have clearly comparable data to do so.

The choice to align the framework included in the Regulation to the **standard EN ISO 14083:2023** is positive as this rule could become a global standard. Considering not only direct emissions (tank-to-wheel) but also emissions generated while producing electricity (well-to-wheel) is also a good decision as it will favour transport modes already largely electrified and will incite transport companies to carefully choose their electricity supplier, as to select the greenest electrical mix.

Making emissions reporting mandatory

However, the so-called "**binding opt-in" approach** applied into the Regulation significantly limits the ability of the text to play a role in greening freight transport. Indeed, only companies willing to report their emissions are asked to apply the Regulation rather than all of them.

The provisions of the Corporate Sustainability Reporting Directive (**CSRD Directive**) that entered into force in January 2023 marginally complement the CountEmissions EU Regulation as emissions reporting, among other data, will be required to be disclosed only for large companies beyond 500 employees.

ERFA asks co-legislators to consider applying the Regulation to all transport companies and to **make CO2 emissions reporting mandatory**. Only this measure will maximise the impact the Regulation can have on shippers to incite them to select the greenest modes for transporting their goods.

The impact assessment of the Regulation does recognise that making the text mandatory will ensure by far the highest reduction of CO_2 emissions compared to all other policy options that do not make emissions reporting mandatory. The policy assessment also recognises that this mandatory dimension will also maximise the effect on other air pollutant emissions such as NOx.

Supporting small actors and clarifying communications

The transport sector is made of thousands of companies, including a large majority of SMEs. For those actors, applying the Regulation could represent a challenge. It has however already been largely reduced as the Regulation will allow the use of default values when primary data are not available.

The Commission should also produce clear guidelines and sufficient communication outreach materials while **ensuring that the chosen framework is user-friendly, well explained, and efficient** for all transport companies.

Moreover, co-legislators must clarify the way the data will be communicated to shippers via a clear, visible, and uniform framework Inspiration could be taken from **self-explanatory frameworks** like the so-called Nutriscore for food products or the carbon labelling schemes used for dish washer, washing machine or ampoule. Shippers must be able to easily find the data produced by transport companies, quickly compare them, and identify which ones are the greenest.