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Opinion of the European Economic and Social Committee on the proposal for a Regulation of the European Parliament and of the Council on the accounting of greenhouse gas emissions of transport services

(COM(2023) 441 final — 2023/0266 (COD))

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Referral	Council of the European Union, 27.9.2023 European Parliament, 19.10.2023
Legal basis	Articles 91, 100(2) and 304 of the Treaty on the Functioning of the European Union
Section responsible	Transport, Energy, Infrastructure and the Information Society
Adopted in section	6.10.2023
Adopted at plenary	25.10.2023
Plenary session No	582
Outcome of vote (for/against/abstentions)	153/1/3

1. Conclusions and recommendations

1.1. The European Economic and Social Committee (EESC) supports the initiative for a harmonised European framework to measure greenhouse gas (GHG) emissions for transport services and the need for clear and reliable information to allow consumers to make sustainable decisions regarding transportation.

1.2. The EESC takes note of the current fragmentation in methods of calculating greenhouse gas (GHG) emissions, which leads to divergences in calculations and makes it impossible to compare them. The existence of different calculation methodologies could compromise the comparability of GHG emissions and provide inaccurate information that could undermine the single market's functioning and fair competition.

1.3. The EESC thinks that making reliable data on emissions available will encourage sustainability and behavioural change towards sustainable transport options.

1.4. The EESC believes that the establishment of a common regulatory framework will foster transparency.

1.5. The EESC calls for a transport sector strategy that ensures a just transition by addressing social issues, protecting workers and guaranteeing accessible and affordable transport services. The EESC believes that, by adopting specific measures to protect consumers and workers, the proposed initiative could encourage the use of sustainable transport.

1.6. The EESC calls for the European Commission to adopt all necessary measures to safeguard affordable public services in order to ensure that the measures are effective from all perspectives.

2. General comments

2.1. The transport sector plays a crucial role in achieving Europe's climate goals. In 2021, following the COVID-19 crisis, the European Environment Agency (EEA) reported that transport emissions had increased by 7,7 %. Estimates indicate that they will increase further in the coming years.

2.2. Particular attention should be drawn to challenges related to the environmental impact of transport, which is still growing, mostly due to the increase in freight and passenger traffic on the European network.

2.3. There is currently no universally accepted framework for GHG emission accounting for transport services. To quantify those emissions, transport operators can choose from different standards, methodologies and calculation tools and from multiple emission default value databases and datasets.

2.4. The Commission notes in its proposal that this fragmentation often leads to a significant discrepancy in results that compromises the comparability of GHG emission figures on the market, and provides inaccurate and misleading information on a transport service's performance.

2.5. The lack of a standard framework is generally recognised by the industry and has resulted in several attempts by the industry and national governments to produce one. For example, in 2012 the European Committee for Standardisation (CEN) introduced the CEN EN 16258:2012 common methodology for the calculation and declaration of energy consumption and GHG emissions related to transport services.

However, none of these attempts have led to GHG emission accounting methods being harmonised or GHG data being consistently used at EU level.

2.6. The EESC notes that this proposed Regulation does not make GHG emission reporting mandatory. It establishes a methodological framework, but it does not mandate that this framework be used. However, any entity that decides to calculate and disclose information on GHG emissions from transport services will have to adhere to the Count Emissions EU rules.

2.7. The objective of the Commission's proposal is to establish a single methodology for calculating and quantifying the GHG emissions of transport services across different modes to enable a fair comparison between various transport services. However, it is important to highlight, that, being highly technical, the proposal may need to be regularly adapted to reflect technical developments, particularly concerning the common reference calculation methodology and the rules on input data, certification and verification.

2.8. The European Commission aims to influence transport users' decisions and create incentives for them to use more sustainable transport options. It proposes using the methodology established by the new standard EN ISO 14083:2023 based on the 'well-to-wheel' concept.

3. Specific comments

3.1. The EESC notes that the 'well-to-wheel' concept is a method to evaluate an energy source's efficiency and emissions by considering its entire life cycle. This method provides a more complete way of measuring energy consumption and GHG emissions than 'tank-to-wheel', which ignores emissions related to the production of energy carriers.

3.2. The 'well-to-wheel' analysis is a comprehensive method for assessing energy efficiency and emissions. It takes into account total energy consumption and GHG emissions throughout the entire life cycle of an energy source.

3.3. The EESC also notes that, although this proposed Regulation addresses 'well-to-wheel' GHG emissions stemming from both vehicle use and vehicle energy provision, the transport sector does create other adverse effects, such as air pollutant and noise emissions, that are outside the scope of the proposal.

3.4. The EESC supports the choice of the new ISO standard 14083:2023 (in its European version EN ISO 14083:2023) as it is the most relevant and proportionate at this point in time in achieving the objective of establishing a common reference methodology. This should ensure that the GHG emissions of transport services are calculated in a standardised way across the entire transport sector, since this standard is recognised worldwide.

3.5. Furthermore, the EESC considers that, without a common approach to input data, GHG emission calculation results will continue to be inconsistent and incomparable even when using the same reference methodology. Therefore, it supports the proposal for a central EU database of GHG emission factors, taking due account of relevant EU regulatory initiatives and other reliable sources, including the revised Renewable Energy Directive (RED II) that is to be adopted and a dedicated topic under the Horizon Europe programme.

3.6. The EESC supports the 'binding opt-in approach' set out in the proposal. The proposed Regulation only establishes a methodological framework and does not mandate that this framework be used. However, it should be noted that any entity that decides to calculate and disclose information on GHG emissions from transport services will be bound by the EU's common methodology established under the regulation.

3.7. Common rules for the communication and transparency of emission accounting results should be provided too. The EESC considers this crucial for correctly comparing GHG emission data on the market and facilitating transport users' choices. It notes that this is in the interest of companies and the energy sector too.

The Sustainable and Smart Mobility Strategy published on 9 December 2020 refers to incentives for choosing the most sustainable transport options. These incentives may be of both an economic and a non-economic nature, including providing better information for users and consumers and making the GHG performance of transport services more transparent.

3.8. The EESC considers that the EU common methodology should not produce extra red tape that would be counterproductive to the objectives pursued. This is of particular relevance for SMEs, which represent the vast majority of companies in the transport sector, and for workers as well.

The EESC notes that the capacities of the national authorities will influence the enforcement of the EU common methodology too. This aspect should be carefully scrutinised to ensure the effective implementation of the proposed Regulation.

3.9. In this respect, the EESC calls for a transport sector strategy that ensures a just and green transition by addressing social issues, protecting workers and guaranteeing accessible and affordable transport services. This includes protecting consumers against false or misleading information and greenwashing marketing.

3.10. In this respect, efficient awareness-raising campaigns should inform consumers, so as to provide them with better knowledge of the performance of transport services, data availability, the options available for travelling in a more environmentally sustainable way and how much these options cost.

Brussels, 25 October 2023.

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of European Economic and Social Committee*
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