

Public consultation on 'CountEmissions EU'

Fields marked with * are mandatory.

Introduction

Transport is currently the only economic sector where total emissions are higher than in 1990, and continue to grow with increasing demand for transport services. Therefore, action is needed to make all transport modes more sustainable, and to promote clean multimodal alternatives to current forms of door-to-door transport for goods and people.

New technologies, improved environmental awareness and tighter laws can all help make transport more efficient and lower emissions. The European Union supports the transport decarbonisation process by providing common requirements, standards and incentives. Some of the incentives are economic in nature, including pricing. Others are non-economic, such as better information for users (e.g. cargo owners, passengers, transport intermediaries and customers) about the environmental impact of services and products.

One potential incentive measure is [Greenhouse Gas \(GHG\)](#) accounting. This is a method for measuring and monitoring greenhouse gas emissions from different economic activities. In the transport and logistics sector, GHG accounting data would give insights into the GHG emission performance of transport services and lead to more informed choices by:

- enabling 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.

This initiative aims to provide a common framework for measuring GHG emissions from freight and passenger transport services, both in the unimodal and multimodal perspective. It should provide a neutral and reliable tool for monitoring and comparing various transport services, irrespective of the mode of transport, sector or country of operation. By making it easier for people and businesses to make sustainable transport choices, it will help the EU to meet the objectives of the European Green Deal and the European Climate Law, and to achieve the milestones set out in the sustainable and smart mobility strategy.

While this initiative focuses on the greenhouse gas emission performance of transport, the European Commission recognises that the environmental impacts from transport go beyond greenhouse gases and include, for example, air pollutant emissions. (In 2019, the transport sector, particularly road transport, was responsible for almost half of all emissions of nitrogen oxides (NO_x) in the EU, and for around 10% of emissions of fine particulate matter (PM_{2.5}) and non-methane volatile organic compounds (NMVOC), according to data reported by Member States to the European Environment Agency).

About you

* Language of my contribution

English

* I am giving my contribution as

Business association

In which capacity will you reply to the following questions?

Transport operator

* First name

Roberta

* Surname

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* Email (this won't be published)

Roberta.Filosa@eraa.org

* Organisation name

255 character(s) maximum

ERA - European Regions Airline Association

* Organisation size

Small (10 to 49 employees)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation.

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Belgium

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Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

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General questions

Transport comes at a cost to the environment and to society, in terms of air quality, health, noise and land use, etc. The European Green Deal and the European Climate Law require a 90% cut in GHG emissions from transport by 2050. To achieve this target, our transport system has to be smart, safe, accessible and affordable. For that, we need not only greener ways of powering vehicles and better alternatives for choosing more sustainable modes of transport, but also a change in the mind-set and behaviour of everyone involved in transport activities, including cargo owners, passengers, consumers, transport operators, transport intermediaries who arrange freight transport for others, service providers and authorities. In this section, you will be asked to what extent you consider environmental issues when deciding on your transport services/journeys/product deliveries.

1. If you are a **transport service user** (e.g. cargo owner, passenger, customer): how important is **the greenhouse gas (GHG) efficiency** as a factor when

choosing or purchasing transport services, making travel arrangements or choosing delivery options for products bought online?

- Not Important
- Slightly Important
- Neutral
- Important
- Very Important
- Not applicable to me

2. If you are a **transport service user** (e.g. cargo owner, passenger, customer): what are the most important **criteria** for you when choosing or purchasing transport services, making travel arrangements or choosing delivery options for products?

Please rank these criteria in the order of importance.

Please rank these criteria in the order of importance.

Use drag&drop or the up/down buttons to change the order or [accept the initial order](#).

⋮	Environmental efficiency
⋮	Price
⋮	Reliability
⋮	Safety
⋮	Timing
⋮	Other (please specify)

2.a. Does the **order of importance change** depending on factors like location and distance (e.g. urban, interurban, interregional, international), type of goods (e.g. weekly groceries (FMCGs), dangerous goods etc.), type of journey (e.g. for work, for pleasure)?

- Yes
- No

2.b. Please explain your answer.

1500 character(s) maximum

N/A

3. If you are a **transport service user** (e.g. cargo owner, passenger, customer): would you like to be given **information on GHG emissions** from available transport options?

- Yes
- No
- In some cases (please specify)
- Do not know
- Not applicable to me

3.a. Please explain in what cases you would like to be given information.

500 character(s) maximum

N/A

4. If you are a **cargo owner: logistics service provider or other organisation organising the shipment of goods**, when choosing or purchasing transport services, are you given enough information on GHG emissions from the available transport options?

- Always
- Frequently
- Occasionally
- Never
- Do not know
- Not applicable to me

5. If you are a **passenger or individual planning a journey**: when choosing or purchasing your travel services, are you given enough information on GHG emissions from the available travel options?

- Always
- Frequently

- Occasionally
- Never
- Do not know
- Not applicable to me

6. If you are **an online customer: when choosing the delivery of your package**, are you given enough information on GHG emissions from the available delivery options?

- Always
- Frequently
- Occasionally
- Never
- Do not know
- Not applicable to me

7. If you are **a transport service user** (e.g. cargo owner, passenger, customer): **how important** to you are the following reasons for considering GHG emissions when choosing or purchasing a transport service, making travel arrangements or choosing delivery options for products?

7.a. For individuals

	Not Important	Slightly Important	Neutral	Important	Very Important	Not applicable to me
Wish to lower the environmental impact of the journey or delivery	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Financial incentives (e. g. employer compensating for choosing sustainable travel options)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

7.b. For organisations

	Not Important	Slightly Important	Neutral	Important	Very Important	Not applicable to me
Wish to lower the environmental impact of the service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Promoting sustainable image of the organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cost reduction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Existing contractual requirements (e.g. between companies)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

7.c. Would you like to add any other relevant reasons?

1500 character(s) maximum

8. For all respondents: **how important** is it for you that information on GHG emissions from transport services, journeys and product deliveries is reliable and comparable?

- Not Important
- Slightly Important
- Neutral
- Important
- Very Important
- Do not know

9. If you are a **transport service user** (e.g. cargo owner, passenger, customer): would you be willing to **pay more for transport, travel or a delivery option** with lower emissions?

- Yes, always
- Yes, provided the costs are not much higher
- No, in most cases it is not possible for me to pay more
- No, I do not consider this aspect at all
- Do not know
- Not applicable to me

9.a. Would you like to explain your answer?

1500 character(s) maximum

10. If you are a **transport service user** (e.g. cargo owner, passenger, customer): would you be willing to **accept later delivery or longer travel time for a transport, travel or delivery option** with lower emissions?

- Yes, always

- Yes, provided the delays do not significantly affect my personal or professional interests
- No, in most cases it is not possible for me to accept longer waiting times
- No, I do not consider this aspect at all
- Do not know
- Not applicable to me

10.a. Would you like to explain your answer?

1500 character(s) maximum

11. If you are a **transport service user** (e.g. cargo owner, passenger, customer): would you be willing to **accept either a less comfortable journey (passenger transport) or introduce additional organisational arrangements (freight transport)** in your company for a transport, travel or delivery option with lower emissions?

- Yes, always
- Yes, provided it does not significantly affect my personal or professional interests
- No, in most cases it is not possible for me to accept it
- No, I do not consider this aspect at all
- Do not know
- Not applicable to me

11.a. Would you like to explain your answer?

1500 character(s) maximum

12. If you are a **transport service provider** (e.g. carrier, operator): do you measure **GHG emissions** when organising your transport services?

- Yes
- Occasionally
- I would like to but I do not have the appropriate tools to do so

- Not yet, but it is planned
- No
- Not applicable to me

12.a. If you do measure GHG emissions when organising your transport services, please specify **the reasons** why you measure CHG emissions. (multiple answers possible)

- To comply with legal requirements
- To address requirements of customers, users or passengers
- To provide operational information for the internal decision-making process
- To help meet an emissions reduction target
- Other (Please specify)
- Not applicable to me

12.b. Please specify "Other"

500 character(s) maximum

Airlines are currently measuring, reporting and verifying CO2 emissions due to legal obligations under the EU ETS and CORSIA for the flights covered by those schemes.

12.c. Would you have any additional comments regarding the measurement of CHG emissions?

1500 character(s) maximum

ERA recommends that GHG emissions are measured per offered seat or per seat km (ASK). An ASK approach would allow for comparison between different modes of transport as the latter report different data. To allow for such comparison it is extremely important that the different modes of transport use comparable factors, such as ASK. Passenger load factors differ among all transport modes and is, thus, not an ideal metric. This is the model that Swedavia airports have chosen in their pricing structure which is based on CO2 emissions. It is also the model that Google Flights has chosen when showing CO2 emissions for different airlines and aircraft types per route. ASK is easily accessible information, while the number of passengers per company per route is less accessible – the solution is therefore easier to manage. Emissions per RPK will inevitably favour some business models against others. LCCs have higher load factors (high PKM), driven by lower prices that stimulate the market. Regional airlines use smaller planes - very often due to limitations on airports (for example small aprons is common phenomenon on remote islands with no alternative connection) - leading to higher seat cost. So their focus is on yield instead of load factor, contributing this way to European connectivity. Finally, load factors are often commercially sensitive data for airlines, whereas fuel consumption is not.

13. If you are a **transport service provider** (e.g. carrier, operator): **how important** are each of the following as reasons to consider disclosing the GHG emissions performance of your services?

	Not Important	Slightly Important	Neutral	Important	Very Important	Not applicable to me
Promoting the sustainable image of your services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Addressing specific requirements from customers, users or passengers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Helping to meet an emissions reduction target	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

13.a. Would you like to add any other relevant reasons?

1500 character(s) maximum

Europe's aviation sector is collectively on board to lead the way in reducing aviation CO2 emissions by 2030 and 2050 – making flying more sustainable for the long term. In February 2021, Europe's airlines, airports, civil aeronautics industry and air navigation service providers laid out a joint long-term vision along with concrete solutions to the complex challenge of reaching net zero CO2 emissions from all flights departing the EU, UK and EFTA by 2050.

Destination 2050 - A route to net zero European aviation report - signed by A4E, ACI Europe, ASD, CANSO and ERA and produced by the Royal Netherlands Aerospace Centre (NLR) and SEO Amsterdam Economics shows how a combination of actions from all stakeholders, including the EU and national governments, in four key areas could achieve substantial CO2 emissions reductions in line with EU climate goals. These include : improvements in aircraft and engine technologies (including hybrid, electric and hydrogen propulsion), using sustainable aviation fuels (SAFs) both for fixed- and rotary-wing platforms, implementing economic measures and improvements in air traffic management (ATM) and aircraft operations.

14. If you are a **transport service provider** (e.g. carrier, operator): would you consider investing or taking steps to reduce emissions from your services if you had reliable information that other similar services performed better in terms GHG emissions?

- Yes, it would be a strong incentive
- Only if there was a clear return on investment
- No, I would not consider this aspect at all
- Do not know
- Not applicable to me

14.a. Would you like to explain your answer?

1500 character(s) maximum

ERA believes that travelers should be able to make sustainable and informed travel choices by getting transparent and comparable information on the emissions of each travel option, notably through indirect distribution platforms. We support the need for information-based Multimodal Digital Mobility Services (MDMS) regulation to provide travelers with relevant information based on a standard environmental emissions accounting system such as the one foreseen in Count emissions EU initiative.

Views on the problems

There are several accounting methodologies for GHG emissions, but the Commission's initial analysis shows that they do not enable people to assess, monitor and compare the GHG emissions from different transport services accurately and fairly. Transport operators often cannot benchmark their services against each other because of different approaches or data gaps. Shippers and logistics companies do not have sufficiently accurate information on the environmental performance of different transport services to base their choices on. Likewise, passengers usually do not have access to the right information when planning journeys or the information is not comparable across different platforms. The same goes for online

shopping customers, who usually are not given information on the GHG emissions for their product deliveries.

This situation limits substantially the benefits of GHG emissions measurement to those companies, which want to calculate and share their emission data and to customers, who are willing to take such elements into account when purchasing a transport service.

In addition, companies that are required to report, may need to comply simultaneously with several different approaches, which create unnecessary administrative burdens for them.

Moreover, the input data and support tools currently available for calculating GHG emissions are insufficient. As a result, many transport operators, especially smaller businesses, do not measure, monitor and share GHG emission data for their services. This means their customers are unable to access the most reliable data on GHG emissions performance when choosing a transport or delivery service.

This section will investigate how important these problems are for you.

15. **How significant** in your opinion is the problem related to the existence of various **GHG accounting methods and calculators** leading to the provision of incomparable GHG emissions data by transport service providers?

- Not significant at all
- Slightly significant
- Neutral
- Significant
- Very significant
- Do not know

15.a. Do you consider it a problem for your private or professional activities?

- Yes
- No
- To limited extent only
- Do not know

15.b. Would you like to explain your choice?

1500 character(s) maximum

For the past two years, ERA and its members have been involved in the development of the EASA's environmental label, which has a similar objective to CountEmissions: increase the transparency of air transport's environmental impact and help the passenger make informed decisions.

The EASA initiative will produce three labels: aircraft label, airline label and a flight label. The latter will calculate the performance of a flight on a specific route and will be based on CO2 per PAX/KM, which regional airlines are not supportive of as the way it has been designed, will mislead passengers to take the wrong decisions regarding choosing between flights based on their CO2 emissions and it favours one business model over others.

If both initiatives are to coexist, there must be harmonization between the two. We are concerned that there could be duplication of work and lead to administrative burden.

Furthermore, the interaction between the two initiatives should take into account the legal "carbon" obligations for each mode of transport. In the aviation sector in particular, the interaction between EU ETS / CORSIA and the technical specifications on how CO2 is monitored, reported and verified which should be the same for all initiatives and the existing market-based instruments.

Finally, IATA also has recently developed a calculator for CO2 passenger footprint.

16. **How significant** is the lack of data, insufficient or incomparable data on GHG emissions in preventing users from making informed choices on transport services, travel options and deliveries?

- Not significant at all
- Slightly significant
- Neutral
- Significant
- Very significant
- Do not know

16.a. Do you consider it a problem for your private or professional activities?

- Yes
- No
- To limited extent only
- Do not know

16.b. Would you like to explain your choice?

1500 character(s) maximum

On travel options, we believe that price will always be most important indicator for passengers when booking a journey.

Any methodology decided upon must find consensus by all stakeholders involved. Harmonisation and easy application (using existing and enlarged databases for mentioned purpose) are key if this initiative is to be successful.

17. What are the main reasons why some transport service providers do not measure the GHG emissions of their transport services?

at most 5 choice(s)

- Limited availability of data in their own company
- Limited availability of data in partner companies along the supply chain
- Difficulty in choosing a suitable methodology
- Fragmentation and inconsistency between methodologies
- Complexity of calculation
- Lack of technical support tools
- Cost of calculation
- Low priority for environmental aspects
- Lack of benefits for the company
- Commercial sensitivity of the emissions data
- Do not know
- Other (please specify)

17.a. Please specify "Other"

500 character(s) maximum

18. What are the main reasons why some transport service providers do not disclose the GHG emissions for their transport services?

at most 3 choice(s)

- Concerns about commercially sensitive data
- Lack of technical support tools
- Costs
- Low priority for environmental aspects
- Lack of benefits for the company

- Data not gathered by or not available to the service provider from their supply chain
- Do not know
- Other (Please specify)

18.a. Please specify "Other"

500 character(s) maximum

Views on objectives and possible measures

CountEmissions EU aims to set up a common framework for measuring GHG emissions from transport services across various modes and countries. This would help to ensure that the resulting emissions data are accurate, reliable and comparable. That, in turn, would enable transport users to make informed choices by comparing the GHG emissions performance of different transport services or travel and delivery options, according to their needs and preferences. If widely available, this information should stimulate behavioural change towards greener transport solutions, both for companies and individuals, and eventually contribute to curbing emissions from transport activities.

The choice of a suitable reference GHG accounting methodology is a central element in this initiative. The Commission may also consider designing support measures and producing guidelines to assist transport operators and service providers who decide to apply the GHG accounting methodology, and to build trust among passengers and users in the information provided.

The Commission is mindful of:

- the need for the methodology and guidelines to cater for specific characteristics and requirements of certain segments of the transport sector, such as passenger transport, postal delivery, dangerous goods, etc.;
- the need for a verification system to ensure quality and comparability of the GHG emissions data shared by transport operators, service providers and other stakeholders in the transport chain;
- the need for access to comparable GHG emissions data for services involving different means of transport in the multimodal transport chain;
- the need for complementary technical tools, calculators and programs to measure and monitor GHG emissions (especially important for individuals, micro-companies and small and medium-sized enterprises);
- the need for regular updates to keep up with new developments.

In this section, you will be invited to provide your views on the relevance of the objectives and to share your opinion on the preliminary policy measures.

19. To what extent do you agree that a common methodology could:

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Do not know
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ensure a consistent approach to measuring GHG emissions?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
provide clear and unambiguous GHG emissions data?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
enable cost savings (a common methodology for calculating GHG emissions would save the time and money involved in investigating and assessing different methodologies)?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
lighten the administrative burden for multinational companies that currently have to deal with a variety of corporate or national requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
create a greater incentive for transport operators to measure and disclose GHG emissions associated with the transport services they provide?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (Please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

19.a. Would you like to add any other relevant reasons?

1500 character(s) maximum

20. To what extent do you agree that the common methodology for calculating GHG emissions for transport services, journeys and deliveries should:

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Do not know
allow for a fair and accurate comparison of the GHG emissions performance of different transport services, journeys and product delivery options?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
provide clarity on how the GHG emissions are measured?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
be user-friendly and allow for a uniform application across the transport sector?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

enable GHG emission data for different transport services, journeys and product delivery options to be presented in a consistent way?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
be based on a globally accepted standard reflecting the international nature of much transport?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
be 'modular', catering for the needs of companies of different sizes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
not lead to substantial increase in costs and administrative burdens for companies and individuals?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

21. How important for you is the issue of access to reliable and accurate GHG emissions data on specific transport services?

- Not Important
- Slightly Important
- Neutral
- Important
- Very Important
- Do not know

22. Considering the effort required and data availability but also the need for accuracy and comprehensiveness, what should be the boundaries of the common methodology as the basis for measuring emissions?

- Tailpipe emissions – direct energy used by vehicles, vessels and aircrafts (tank-to-wheel)
- Energy lifecycle, including tailpipe emissions but also emissions from energy production and use (well-to-wheel)
- Full product lifecycle (from cradle to grave), including emissions stemming from transport operations, energy production and use, and production and recycling of all means of transport (e.g. a train, ship, road vehicle, airplane, and their specific components and parts) used for a transport service
- Do not know
- Other (Please specify)

22.a. Please specify "Other"

500 character(s) maximum

23. Would you like to comment on or raise any other issues relating to a common methodology for measuring GHG emissions in transport?

1500 character(s) maximum

When it comes to monitoring GHG emissions, the aviation sector is currently monitoring only the CO₂ effects. The complexity of the calculation is due to the lack of a methodology for non-CO₂ emissions which are however an important element to tackle. Therefore, and given the insufficient scientific understanding of the non-CO₂ effects on climate, we recommend to further conduct additional studies and investigations.

Regarding the common methodology for all modes of transport, it should be pointed out that - in order for the methodology to be fair and just - it should take into account the obstacles that each mode is facing in terms of decarbonisation. In the aviation sector, decarbonisation can only be achieved if: a) SAF production and deployment develops fast over the next few years and b) advanced technologies (including hydrogen and electric aircraft) are installed in aircraft and engines. The uncertainty in these two areas is greater than the obstacles that the reality imposes on alternative modes such as electric trains, cars and buses in which decarbonization is more feasible.

In addition, there is a need to include in the methodology the impact of purchased and submitted ETS allowances and offsets, for the method to be reliable, fair and equitable. 50% of EU ETS revenues are used for climate change projects but there is no quantification in terms of GHG emissions of the (positive) climate impact of these projects funded by EU ETS revenues.

24. Do you think a verification system is needed (e.g. certification or accredited verifiers) to ensure that the GHG emissions data provided on specific transport services, journeys and product delivery options, are compliant with the common methodology?

- Yes
- Yes, unless this is very burdensome for various stakeholders
- Yes, but the verification should be voluntary (e.g. like a quality label)
- No
- No opinion

25. Do you think there is a need for additional technical measures, tools, guidelines, calculators and programs to facilitate the uptake of a common methodology for measuring the GHG emissions of transport services, journeys and product deliveries?

- Yes

- No
- Yes, in some cases
- No opinion

25.a. If you replied 'Yes' or 'Yes, in some cases', please explain where you think such support tools or guidelines could be most helpful. What suggestions or concerns would you have about their use in the sector you operate in?

1500 character(s) maximum

Along with the necessity for additional tools/ guidelines/ calculators for the common methodology, the involvement of national authorities for EU ETS and CORSIA (mainly HCAA and Ministries of Environment) is needed to ensure that the common methodology is aligned with the requirements that competent authorities impose on each mode of transport in terms of CO2 emissions.

Further to our comments on question 23, a technical recommendation regarding the methodology. In the GHG calculations for the Count Emissions initiative, it should be included the effect that potential offsetting may have on the indicator used. For example, the offsetting may take place under CORSIA should be included in the common methodology.

Moreover, the common methodology in the Count Emissions initiative has to set the criteria for eligible emission reduction units similar for all modes of transport. Since aviation is the most advanced in this sector, ICAO's CORSIA requirements can be used for reduction units and eligible projects (under specific programs).

26. Once a common methodology has been devised for calculating GHG emissions, should its use be compulsory or voluntary?

- It should be voluntary, the users can pick this or any other methodology.
- It should be voluntary, but if GHG data are to be published or shared then only this common framework should be used to ensure that the users can compare fairly.
- It could be mandatory in some circumstances or for some services (e.g. for public services, for e-commerce deliveries, for large companies etc.).
- It should be mandatory for all transport service providers.

26.a. If 'mandatory in some circumstances or for some services', please elaborate on your answer.

1500 character(s) maximum

Other

27. If you wish to add further information or comments – relevant to this questionnaire – please feel free to do so here.

3000 character(s) maximum

28. Do you wish to upload a position paper or additional evidence supporting your responses?

Please feel free to do so. The maximum file size is 1 MB.

Please do not upload a document unless you have responded to the questionnaire, which is the essential input to this consultation. Any upload will be seen as additional background reading to help us better understand your position. It will be published alongside your responses to the questionnaire.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

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