

EEA Position Paper on the Commission proposal on the accounting of greenhouse gas emissions of transport services - Regulation (EU) 2023/0266

Introduction

The European Express Association (EEA) welcomes the European Commission's proposal of the so-called 'CountEmissions EU' regulation, which aims to introduce a common framework to calculate and report transport-related greenhouse gases (GHG).

Through the introduction of a directly applicable regulation, the CountEmissions EU framework will support the express industry's continued commitment to the reduction of GHG emissions throughout the supply chain through providing a harmonized methodology for the calculation for such emissions; including for scope 3 emissions created via subcontracting or otherwise.

Customers and end users are increasingly expecting further information from transport providers regarding the GHG emissions within their supply chains. Whilst in most cases this information is provided to the best of the operators' ability, a common calculation methodology is not yet available which potentially allows for distortions when comparing CO₂ footprints of the transport-related GHG emissions. The introduction of CountEmissions EU, however, will establish a common sectoral standard and calculation/reporting methodology that allows for more accurate and increased levels of comparability and transparency. Consequently, express operators will be empowered to showcase our efforts to decarbonise in all modes of transport used in our supply chains; for example, through electric vehicles for first and last mile deliveries, sustainable aviation fuels (SAF), and other sustainable alternatives.

Key priorities and reflections from the EEA on the CountEmissions EU proposal can be found below.

A. ISO 14083: Support for a harmonized approach to GHG emission reporting

Given the international scope of express transport, **the EEA strongly supports the inclusion of ISO14083 in CountEmissions EU as the globally recognized standard** for data collection, monitoring, and calculation methodology. The use of ISO14083, which builds upon the existing GLEC framework¹ and

¹ First formed in 2016, the Global Logistics Emissions Council (GLEC) developed the GLEC Framework – a global method for the calculation and reporting of logistics emissions: <https://www.smartfreightcentre.org/en/our-programs/global-logistics-emissions-council/calculate-report-glec-framework/>

utilizes a ‘well-to-wheel’² approach, will enable a harmonized approach to the collection and processing of GHG emission data ensures a level-playing field among operators, whilst also providing the necessary transparency for end users to enable more informed and sustainable decision-making. In this respect, the ISO 14083 standard should not be undermined through the reference to EU legislation that could impact its practical implementation as a true international standard. For example, through the reference to the alignment of Refuel EU in the Council’s General Approach.

B. Welcoming of the binding opt-in & request for further consideration into tools to support uptake

The EEA additionally **supports the initial introduction and use of a binding opt-in scheme**. The benefits of such an approach promotes the harmonization and comparability of reporting, whilst also ensuring smooth implementation and minimizes the administrative burden for SMEs. Nonetheless, **the EEA advocates for the consideration of incentive tools and mechanisms and supporting materials such as guidelines and templates to further encourage and expediate sectoral up take of GHG emission reporting, whilst similarly reducing the cost impact of reporting on SMEs**. Whilst it is also understood that market forces may require companies to report GHG emissions, it must be avoided that the voluntary nature of the opt-in is not abused in the long-term as means to avoid reporting itself.

C. Data Usage

The EEA **welcomes the acceptance of both primary and secondary data** within the proposed regulation, especially default values from third-party providers, particularly where road transport subcontractors are SMEs that not necessarily have the adequate means to furnish primary data. Meanwhile, the use of primary data by the main contractors will ultimately increase the accuracy of reporting GHG emissions, supporting the principle goals of the proposed regulation.

Overall, the EEA acknowledges and appreciates the work performed in the development the proposal from the European Commission, and calls upon the co-legislators to maintain the key elements within the framework, whilst supporting its swift progress before the end of the legislative period. It should also not be forgotten that the goals of the CountEmissions EU regulation closely align with and reinforce the goals pursued in similar EU legislative initiatives such as those under the ongoing Fit for 55 package, and therefore its progress should not suffer from unnecessary delays.

About the European Express Association

The European Express Association (EEA) represents the interests of the express industry in Europe. The express industry provides door-to-door transport and delivery of next-day or time-definite shipments, throughout Europe and the world. According to a 2020 Oxford Economics [study](#) on the impact of the express industry on the EU economy, the European express industry directly supported 330,000 jobs and an estimated 1.1 million indirect jobs in the EU in 2018, while generating €24 billion in tax revenues for EU Member States’ governments that same year.

² Well-to-wheel analysis represents a comprehensive methodology of calculating efficiency and emissions of an energy source; including from their extraction (well) to their use (wheel).