

Position Paper

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CER Position on the call for evidence for an impact assessment on the EU framework for harmonised measurement of transport and logistics emissions CountEmissions EU

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CER supports the Commission initiative

Driving the transition to zero-emission mobility as required by the EU Green Deal will only be possible by placing the right incentives to transport users. Achieving the 90% greenhouse gas emission reduction in the transport sector by 2050 requires a basket of measures that include a robust carbon pricing, taxation, infrastructure charging and CO₂ standards for vehicles complemented by financial incentives to develop cleaner mobility.

According to the [EU Sustainable and Smart Mobility Strategy](#), the Commission plans to establish a European framework for the harmonised measurement of transport and logistics greenhouse gas (GHG) emissions by 2022. CER, therefore, welcomes the initiative called [CountEmissions EU](#), which should be applicable to all transport modes avoiding greenwashing. It will offer the EU citizens the tools to make sustainable choices in order to facilitate a shift to the most energy efficient and sustainable transport solutions, strengthening the EU Green Deal by accelerating zero-emission mobility.

This European harmonised carbon footprint tool should follow the energy-efficiency first principle and ideally lead to energy-efficiency labelling of transport services and in the long run contribute to the polluter pays principle by including a pricing dimension.

CER proposals to enhance energy-efficiency and incentivise the reduction of emissions from transport and logistics

CER agrees with the Commission that the CountEmissions EU should provide a harmonised EU framework for calculating GHG emissions data of transport operations/services in freight and passenger sector. It is important to pay particular attention to the following points:

- It has to be noted that GHG emissions of transport is a product of the carbon intensity of transport fuel, energy consumption of vehicles and transport activity.
- GHG intensity (per passenger-km and tonne-km) is a relevant KPI to measure efficiency of transport operations. It should be based on annualised utilisation of the passenger and freight services. Transport operators should be allowed to advertise the GHG emissions of a single journey. The basis for the indicator should be energy intensity expressed in kWh per transport unit or per passenger-km and tonne-km.
- It is important to have business coverage relevant to passengers and shippers. For the rail sector:
 - Passenger: Long-distance (optional: high-speed, regional, urban, night trains); railways should ideally be integrated to door-to-door transport, including walking/cycling/public transport/car to and from the stations.
 - Shipper: Freight, where rail is often used for long distance transport and intermodal rail with waterborne or other land transport.
- The methodology should be built on existing European methodologies such as EN16258 and EN50591. The planned international standard ISO 14083 should particularly be taken into account. Railway sector represented by the International Union of Railways (UIC) have long-established, EN16258 standard certified tools ([EcoPassenger](#) and [EcoTransIt](#)) with well-to-wheel emissions. Over a billion transports have already been calculated by EcoTransIt, which allows calculation of complete transport chains across

all modes of transport (truck, train, ocean vessel, inland waterways, aircraft) including transshipments/warehousing worldwide on the basis of a scientific and neutral methodology.

- Like in EN16258, rules should be set for offsetting GHG emissions: e.g. not allowing planting trees but rather procuring green energy for transport.

It is important to make available, reliable and comparable information on the GHG intensity of individual transport services. CER has the following remarks:

- EU harmonised approach is required to avoid sector initiatives to have a credible tool (calculator). This harmonised methodology should be recognised by independent institutions like the European Environment Agency or Global Reporting Initiative for all transport modes, as well as national environmental agencies which are currently involved in GHG accounting. A lot has been already done at the national level, so it would be advisable to build on this experience. Furthermore, the tool should be built on the basis of input data specific for each country and should be consistent with the regulations already in force in this respect in individual countries and should constitute a legal regulation, not further guidelines.
- The calculator should be suitable for comparison of intermodal door-to-door journeys.
- Regrettably, the Commission already mandated the European Aviation Safety Agency (EASA) to develop an environmental labelling including a carbon footprint for flights. This work should first of all take the international standard (future ISO 14083) into account. Efforts are needed to develop a transport label in order to allow intermodal comparison. Having a stand-alone label for individual transport modes would confuse transport users and should be avoided.

In parallel to the development of the carbon footprint tool, focus should be given to facilitate the use of GHG emissions accounting by stakeholders (passengers and shippers). The tool should be easy to use and easy to understand, giving its users a clear orientation of the most environmentally friendly mode of transport. For example, the tool should be embedded to end-product labelling (e.g. in shops, including online shopping). CER supports the following points that are covered in the Staff Working Document of the EU Sustainable and Smart Mobility Strategy (paragraphs 557-575):

- For the short-term integrating the tool into travel information systems, indicating also the monetised impact, to inform consumers and raise their awareness;
- For the long-term the tool should be included in the ticketing/pricing systems for all transport modes. The revision of the delegated regulation 2017/1926 on EU-wide multimodal travel information could provide a suitable framework for this.
- The EU Year of Rail in 2021 provided an excellent opportunity to promote rail as a sustainable form of transport. Cleaner modes like rail should remain in the centre for the EU Green Deal in the decades to come and carbon footprint tool should be communicated to the EU citizens through the EU Mobility Week and making use of the EU Climate Pact.

Finally, when it comes to the type of policy instrument, CER prefers that the carbon footprint tool serves as a basis for a transport services label that is established by a legislative proposal and be mandatory in nature.

About CER

The Community of European Railway and Infrastructure Companies (CER) brings together railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 73% of the rail network length, 76% of the rail freight business and about 92% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow us on Twitter [@CER_railways](https://twitter.com/CER_railways) or [LinkedIn](https://www.linkedin.com/company/cer).

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