Contribution ID: c192c6bd-86dd-466b-bd97-bc34f43515fd
Date: 14/10/2022 16:40:46

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 (NOx) in the EU, and for around 10% of emissions of fine particulate matter (PM2.5) 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?

Other

Please specify "Other"

500 character(s) maximum

The European Biogas Association is a business association representing the biogas and biomethane industry at European level.

* First name

Anna

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* Organisation name

255 character(s) maximum

European Biogas 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.

* Country of origin

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

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

Belgium

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

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- **Public**

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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

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

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	○	○	○	○	○	○
Financial incentives (e. g. employer compensating for choosing sustainable travel options)	○	○	○	○	○	○

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	○	○	○	○	○	○
Promoting sustainable image of the organisation	○	○	○	○	○	○
Cost reduction	○	○	○	○	○	○
Existing contractual requirements (e.g. between companies)	○	○	○	○	○	○

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

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

1500 character(s) maximum

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	○	○	○	○	○	○
Addressing specific requirements from customers, users or passengers	○	○	○	○	○	○
Helping to meet an emissions reduction target	○	○	○	○	○	○

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

1500 character(s) maximum

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

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

The lack of harmonisation among the existing GHG accounting methods and calculators in the EU transport policies is a major problem that is hampering the decarbonisation potential of the sector. In order to ensure that all available technologies contribute to decarbonise transport in a fast and cost-effective manner, EU legislation should be built on a Well-to-Wheel methodology. As asserted also by the Joint Research Centre, the Well-to-Wheel analysis is required to properly assess the climate impact of different technologies. The Tank-to-Wheel, or tailpipe approach, on its own is inadequate as it disregards the potential environmental benefits of renewable and low-carbon fuels that are already available and scalable – such as biomethane –, while overlooking the GHG emissions connected to the production of other energy sources that are considered as zero-emissions.

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

The lack and inadequacy of data on GHG emissions and its accounting is not only preventing users from making an informed choice on the best environmental delivery solution, but it is also discouraging the use of some solutions in relation to others, thus disrupting the level playing field between different technologies. Existing solutions, such as biomethane, can already guarantee a reduction of the carbon footprint of the current fleet. As an example, if an LNG truck uses a 40% bioLNG mix with LNG, its CO2 emissions can be reduced by 55%, under the well-to-wheel perspective. When it comes to 100% biomethane, the GHG emissions balance is even negative.
If a Well-to-Wheel approach is not implemented, transport users could be misled in choosing transport options that are more GHG intense and thus discouraging the whole value chain, from producers to manufacturers, to continue improving the efficiency of all technologies, including the Internal gas Combustion Engines (ICEs), which would be phased out in case of the adoption of a tailpipe approach.

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
ensure a consistent approach to measuring GHG emissions?	○	○	○	○	◉	○
provide clear and unambiguous GHG emissions data?	○	○	○	○	◉	○
enable cost savings (a common methodology for calculating GHG emissions would save the time and money involved in investigating and assessing different methodologies)?	○	○	○	○	◉	○
lighten the administrative burden for multinational companies that currently have to deal with a variety of corporate or national requirements?	○	○	○	○	◉	○
create a greater incentive for transport operators to measure and disclose GHG emissions associated with the transport services they provide?	○	○	○	○	◉	○
Other (Please specify)	○	○	○	○	○	○

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

1500 character(s) maximum

If properly implemented, the GHG emissions accounting should be able to encourage companies, customers and passengers to choose more environmentally friendly and efficient transport solutions, hence boosting

the market for these vehicles.
Probably there will be consensus among stakeholders consulted that a common methodology would have all the positive effects listed in Q19. However, the key concern here is how to get beyond the obstacles of establishing a technique that is accurate, fair, meaningful, and effective without distorting already-existing EU-level measurements (i.e. CO2 emissions from HDVs).
To design an approach that fits with existing efforts aimed at reducing carbon emissions already in operation or presently being discussed, the Commission must make a very serious effort to coordinate.

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?	○	○	○	○	◉	○
provide clarity on how the GHG emissions are measured?	○	○	○	○	◉	○
be user-friendly and allow for a uniform application across the transport sector?	○	○	○	○	◉	○
enable GHG emission data for different transport services, journeys and product delivery options to be presented in a consistent way?	○	○	○	○	◉	○
be based on a globally accepted standard reflecting the international nature of much transport?	○	○	○	○	◉	○
be ‘modular’, catering for the needs of companies of different sizes?	○	○	○	○	◉	○
not lead to substantial increase in costs and administrative burdens for companies and individuals?	○	○	○	○	◉	○

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

The upcoming CountEmission EU initiative must implement an EU harmonised methodology for measuring GHG emissions in transport that is technology neutral, able to assess the full environmental impact of a given fuel take, and that is consistent with other pieces of EU legislation dealing with transport decarbonisation, such as the Renewable Energy Directive and the Energy Taxation Directive.

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

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

A harmonised system for accounting GHG emissions from transport operations is urgently needed to enable customers and consumers to make informed decisions that drive decarbonisation of the transport sector. It is therefore crucial that the CountEmission EU initiative does not set up too complex a system which would hinder a quick roll-out of the harmonised methodology; while it must also account for GHG emissions both in the well-to-tank and tank-to-wheel perspective.
While the CountEmissions EU methodology should evolve over time to include progressively more comprehensive GHG calculations through the value chain, it is of utmost importance that a harmonised methodology becomes available as soon as possible, in order to drive the shift towards low- and zero-emission transport. Therefore, simplicity is key in the first iteration of the CountEmissions EU methodology. As a starting point, the methodology should therefore look into existing methodologies for calculating the GHG emission reduction of low- and zero-carbon fuels, such as biogas and biomethane, in complementarity with the well-established tailpipe methodologies. As an example, the initial framework could combine a simple calculation of the share of a transport operation that has been carried out using zero-emission technologies, together with a fuel accounting mechanism based on the methodology for calculating the GHG impact of biofuels set out in Annex VI of the Renewable Energy Directive. By building on established frameworks, the CountEmissions EU initiative can become a significant contributor to the shift towards net-zero emission transport.

Moreover, in order to avoid contradictory standards, it is important that this initiative is fully consistent and coherent with existing and future European and international legislative and non-legislative measures such as Renewable Energy Directive, Fuel Quality Directive, Batteries Regulation, CO2 emission standards, GRPE LCA and Corporate Sustainability Reporting.

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

d4ccbba1-dcfe-49ac-9fb9-d0f2429bd8d3/EBA_-_Policy_Paper_on_CO2_standards_for_HDVs.pdf

Contact

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