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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
N° prev. doc.:	ST 10915/2024
N° Cion doc.:	ST 11821/2023
Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the accounting of greenhouse gas emissions of transport services = Comments from Estonia

Delegations will find attached comments from **Estonia** on the above-mentioned document.

Written comments Estonia (INTERMODAL VTC, 23.07 – Regulation on the accounting of greenhouse gas emissions of transport services, four-column document 10915/24)

Estonia can agree with the proposed categorization and can, in general, be flexible towards the proposals put forward by the European Parliament. However, in certain questions Estonia deems it necessary to stick to the Council mandate. Furthermore, on lines 39a, 154a and 159, Estonia will need further time to analyse.

Please find some detailed comments/positions below:

Line 15 – Oppose EP addition. From the point of view of the blue economy and the environment, the emphasis on rail transport alone is unwarranted – short sea and inland waterways shipping should be on an equal footing with rail.

Line 18 – Support the EP addition - the absence of this part could lead to so-called bypassing in the maritime sector (e.g. in the ports of the Baltic Sea). Longer travel plans would be made to get both the port of departure and the port of destination out of the territory of the Union.

Lines 19, 19a, 33a, 33b, 49b, 124a, 152a – Oppose EP additions concerning data intermediaries. The Regulation should not apply to data intermediaries.

Line 20a – Relevant references to the Consumer Empowerment and Green Claims Directives, support EP addition.

Line 21 – Support the EP emphasis on highlighting SMEs.

Lines 22, 22a and 84a – The corresponding ISO standard 14083:2023, according to which GHG emissions should be calculated, should be available free of charge if legally possible and if ISO functionality can be sustained. Flexible about the use of EP or GA wording on this matter.

Line 27 and lines 100-100h – Support Council wording so to not create a double administrative burden for submitting data and duplicated activities.

Line 38a – Cautious about entering into a new commitment.

Line 39a – If working with EP wording then in the wording of the first sentence, we are in favour of *may* instead of *should*.