



Council of the European Union  
General Secretariat

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**Interinstitutional files:  
2023/0266 (COD)**

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WK 12146/2025 ADD 2

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## WORKING DOCUMENT

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From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
N° Cion doc.:	ST 11821 2023 INIT + ADD 1 - ADD 4
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 Portugal

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Regarding the doc WK 11696/2025 REV1, please consider the following comments from **Portugal**.

### ***“Article 15a***

*We consider that the Presidency's proposal constitutes a balanced solution, by allowing verifiers accredited under other EU instruments in the maritime sector to perform functions under Count Emissions, subject to notification to the competent national authority. This approach ensures continuity, reduces administrative burdens and avoids unnecessary duplication.*

*We nevertheless acknowledge the validity of the Commission's concern regarding the need to ensure that these verifiers effectively possess the technical capacity required under Count Emissions, including specific competences such as conducting well-to-wheel emission calculations and integrating with the Union's central database on greenhouse gas intensities.*

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*In this respect, the introduction of a safeguard could be considered, provided that it is limited to a simple, harmonised and non-bureaucratic declaration, to be submitted together with the notification already foreseen, thereby avoiding any duplication of processes or equivalence to a second accreditation.*

*Such a declaration could be based on clear and objective criteria, for instance by means of checkboxes confirming familiarity with recognised standards such as ISO 14083, as well as the capacity to use the calculation tool provided by the Commission.”*