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WORKING DOCUMENT

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 Latvia

Delegations will find in annex comments from **Latvia** on the above subject.

Proposal for a Regulation on the accounting

of greenhouse gas emissions of transport services

(Count Emissions EU)

WRITTEN COMMENTS OF LATVIA

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Latvia thanks the Presidency for the proposal for clarification of paragraphs in Article 15a to address the Commission's concerns in order to forward it to the Parliament for further consideration.

We would like to propose some changes to the text that reflect the essence without duplicating some unnecessary wording, at the same time maintaining the idea of originally proposed text by the Presidency taking into account the Commission's concerns about the declaration on the verifier's capacity that could possibly be submitted to the designated national authority. We agree with the Presidency that there could be additional administrative burden by submitting a declaration. Therefore our proposal is limited only to the information that should be provided by a verifier about extension of their activities to *Count Emissions EU* Regulation.

Additionally, we believe that it is crucial that the two transport sectors as presented in the Presidency's draft proposal are clearly identified at the beginning of each paragraph accordingly.

Proposed text for the maritime sector in ***bold italic*** and strikethroughs in ~~*italic*~~.

Article 15a

Verification under other Union acts including maritime and aviation sectors

1. ***For the maritime sector***, ~~*T*~~*t*he verifiers accredited pursuant to Article 14 of Regulation (EU) 2023/1805 and the delegated acts adopted on the basis thereof, or Article 16 of Regulation (EU) 2015/757 and the delegated acts adopted on the basis thereof, may perform the duties of conformity assessment bod***y*~~*ies*~~ ***and shall be deemed to be accredited*** under this Regulation, ***provided that they have informed the designated national authority referred to in Article 15(2) about the extension of their verification activities to this Regulation***. ~~*Those verifiers shall be deemed to be accredited pursuant to Articles 14 and 15 of this Regulation to perform duties for the maritime sector, provided they informed the authority referred to in Article 15(2) of their intention to perform the duties of conformity assessment bodies under this Regulation.*~~

Proposed text for the aviation sector in ***bold italic*** and strikethroughs in ~~*italic.*~~

Article 15a

Verification under other Union acts including maritime and aviation sectors

2. ***For the aviation sector***, the verifiers accredited pursuant to Article 15 of Directive 2003/87/EC and to the implementing acts adopted on the basis thereof, may perform the duties of conformity assessment bodies under this Regulation. Those verifiers shall be deemed to be accredited pursuant to Articles 14 and 15 of this Regulation **to perform duties for the aviation sector, provided they informed the authority referred to in Article 15(2) of their intention to perform the duties of conformity assessment bodies under this Regulation**. ~~*Those verifiers shall be deemed to be accredited pursuant to Articles 14 and 15 of this Regulation to perform duties for the maritime sector, provided they informed the authority referred to in Article 15(2) of their intention to perform the duties of conformity assessment bodies under this Regulation.*~~

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