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INFORMATION

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
N° prev. doc.:	ST 14177/1/23 REV1
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Subject:	Proposal for a REGULATION on the accounting of greenhouse gas emissions of transport services - Comments from Member States on the revised PCY compromise

Delegations will find attached comments from **Finland** on the above-mentioned subject.

Written comments by Finland regarding the Proposal for a Regulation of the European Parliament and of the Council on the accounting of greenhouse gas emissions of transport services (CountEmissions EU)

Overall, we thank the presidency for the work on the draft proposal, and taking into account the concerns of the member states.

In addition and in support of the interventions made in the working party, we would like to take this opportunity to highlight our main comments:

As a general comment, we would point out that the regulation should refrain from too prescriptive requirements related to the calculation, going beyond what the standard provides, unless absolutely essential. This regulation concerns several different types of reporting: these can range from predicting emissions from an individual parcel delivery to reporting annual transport related emissions of group of companies. The standard provides necessary flexibility to achieve this. In addition, as the Regulation is applied on a voluntary basis, we have concerns whether too prescriptive requirements (for example in articles 5(1) and 6(1)) would make it less attractive for operators to calculate and report their emissions.

Article 6 Core EU database of default values for greenhouse gas emission intensity

In paragraph 1, we would like to specify clearly, that member states provide only advisory or consultative assistance to the commission, in order to avoid additional administrative burden. We also have doubts on the practical implications of a rule to prioritize the use of internationally agreed values, instead of national values.

Article 15a Verification under other Union acts including maritime and aviation sectors (and other relevant provisions)

When it comes to specific provisions for maritime and aviation sectors, we support the aim of the presidency in avoiding additional administrative burden and double verification. At the same time, we need to make sure the harmonization objective of this regulation is maintained, to ensure consistency and comparability of data.