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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 **Denmark** on the above-mentioned subject.

DK written remarks on Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the accounting of greenhouse gas emissions of transport services – Presidency's second compromise proposal

The production of electricity for battery electric vehicles and fossil fuels for internal combustion engine vehicles varies considerably among countries in the EU. In 2022, renewable energy sources constituted 22.5% of the EU's final energy consumption, while Denmark reached a higher proportion at 36.7%¹. As a result of that Denmark has significantly lower greenhouse gas emissions from energy consumption compared to the EU average.

In 2019, the European-level emission factor for electricity consumption, as ISO14083 recommends, measured 97 g CO₂e/MJ. In the same year Denmark had a lower emission factor of 36 g CO₂e/MJ².

However, ISO14083 advocates for a location-based approach, specifically outlined in Chapter J3, stating: "GHG emissions from electricity consumed by transport shall be quantified using the location-based approach by applying the GHG emission factor that best characterizes the pertinent grid, i.e. dedicated transmission line, or local, regional, or national grid-average GHG emission factor."

The references in Article 6, nr. 1 and Article 8 nr. 1 to unique features of the Member States and internationally agreed standards thus compromise the location-based approach recommended in the EN ISO standard 14083:2023.

Article 8, nr. 1 Presidency compromise of 7. November 2023

The Commission, with the technical assistance of the European Environmental Agency and, where necessary, with additional input from Member States, shall establish a central EU database of default greenhouse gas emission factors referred to in Article 5(2), point (b) including greenhouse gas emission factors for energy carriers used in the Union and, in the Member States. These greenhouse gas emission factors shall reflect unique features in different Member States. The EU central database shall include greenhouse gas emission factors agreed at international level. When these emission factors are available in the EU central database, they shall be used as default emission factors.

In order to take into account, the recommended location-based approach methodology, we propose the following amendment:

Article 8, nr. 1 Amendment proposed by Denmark

*The Commission, with the technical assistance of the European Environmental Agency and, where necessary, with additional input from Member States, shall establish a central EU database of default greenhouse gas emission factors referred to in Article 5(2), point (b) including greenhouse gas emission factors for energy carriers used in the Union ~~and, in the Member States~~. These greenhouse gas emission factors shall reflect unique features in **accordance with the location-based approach in the reference methodology for calculating greenhouse gas emissions** ~~different Member States. The EU central database~~*

¹ Includes emissions from heating/cooling, electricity, transport ([Renewable energy \(europa.eu\)](https://renewableenergy.europa.eu/))

² Danske energi- og emissionsnøgletal, Energistyrelsen. Angivet som 129 g CO₂e pr. kWh.

~~shall include greenhouse gas emission factors agreed at international level. When these emission factors are available in the EU central database, they shall be used as default emission factors.~~ **The EU central database shall include agreed greenhouse gas emission factors. When these emission factors are available in the EU central database, they shall be used as default emission factors.**

Denmark proposes a parallel amendment to Article 6, nr. 1.