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

Proposal for a Regulation of the European Parliament and of the Council on the accounting of greenhouse gas emissions of transport services - SK opinion on the second compromise proposal

SK welcomes the proposed changes to the text.

No particularly problematic changes have been identified.

Particularly, we positively perceive changes aimed at:

1.) Reducing the burden on SMEs, namely

- an effort to provide the ISO standard free of charge or at a reduced rate to the transport industry to make this regulation more accessible to all who may be affected by it (Recital 12).
- the provision of calculation tools by EC to assist SMEs in the implementation of this regulation to achieve the greatest possible harmonization in the accounting for the most typical services, to increase data transparency, to limit the complexity of the calculation, and to reduce the administrative and financial burden on SMEs. (Recital 26)
- the provision on the core EU database of core GHG intensity values for typical vehicle and vessel types (Article 6)
- the provision on the central EU database of default greenhouse gas emission factors (Article 8)
- the provision on the calculation tools elaborated by the Commission to assist SME and to be used on a voluntary basis or external calculation tools (Article 9)
- the provision on the guidelines to support the widespread application of the Standard and to help SMEs with the implementation of this Regulation (Article 18a)

2.) Achieving a high level of harmonization with other relevant initiatives of the EU

It also would be useful to explicitly state (e.g. in one of the recitals) the compliance of the proposal with the upcoming directive on empowering consumers in the framework of the green transition, with which the proposal overlaps in its objectives.

3.) Expanding the scope of the proposal in order to provide for calculations of greenhouse gas emissions based on the full life cycle in the future (recital 34)

4.) Specification of the periodicity of mandatory updating of emissions calculations (Article 10)