

# COUNT EMISSIONS EU

*Proposal for a Regulation on the accounting of greenhouse gas emissions of transport services (COM(2023) 441 final)*

The draft Regulation sets out a common framework to voluntarily calculate and report transport-related greenhouse gas emissions. This information will allow service providers to monitor and reduce their emissions, improve efficiency of transport services and choose the most sustainable option.

## WHAT'S IN IT?

### OBJECTIVE

#### Climate ambition

In view of respecting the limit of 1.5°C global warming under the Paris Agreement

#### Biodiversity

Preserving biodiversity in the EU and beyond

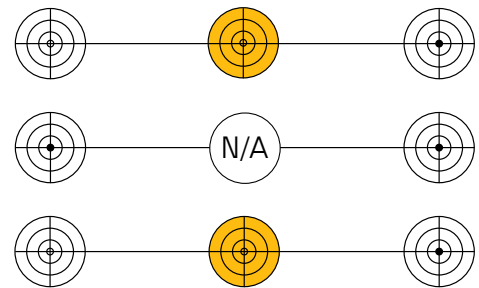
#### Zero pollution

Achieving zero pollution and a circular economy in the EU and beyond

GOOD PROSPECTS  
IN VIEW OF  
THE OBJECTIVE

MIXED  
PROSPECTS

A STEP BACKWARDS,  
UNDERMINING  
THE OBJECTIVE



## WHAT'S NEXT?

### STATUS

Pending/  
unclear



### MILESTONES



## WHAT TO WATCH OUT FOR?

**Speed.** Slowing down the EU law's progress or implementation.

**Money.** Conflict on distributional effects or lack of finance for making this EU law impactful.

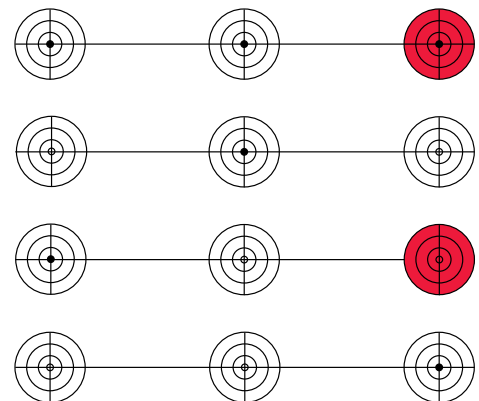
**Licence for polluters.** Undermining the polluter-pays principle, increasing global pollution.

**Inequalities.** Allowing for practices that deepen global inequality.

LIMITED RISK

MEDIUM RISK

HIGH RISK



NO RISK

N/A NOT APPLICABLE



Learn more  
[eu.boell.org/green-deal-risk-radar](https://eu.boell.org/green-deal-risk-radar)

## WHAT'S IN IT?

### **Climate ambition**

This draft Regulation sets out a common framework to voluntarily calculate and report transport-related well-to-wheel greenhouse gas emissions, with regard to both the passenger and freight sector. A common methodology for calculating their climate impact is a first step in promoting the needed modal shift and reducing the growing negative impact of the transport sector. However, its voluntary nature and the limited scope of the European Commission's proposal strongly reduce its real impact.

### **Biodiversity**

Not directly relevant for the protection of biodiversity.

### **Zero pollution**

As combustion engines are significant sources of pollution, it is assumed that any action incurred to reduce greenhouse gas emissions will also generate co-benefits in reducing overall pollution.

## WHAT TO WATCH OUT FOR? RISKS

 Speed    Money    Licence for polluters    Inequalities

Twenty-seven years after the EU first adopting a target to reduce greenhouse gas emissions, there is still no common methodology to track the climate impact of transport services. Getting agreement on this issue is highly needed but the question is whether this will be in place before 2030. That depends on the trilogue negotiations, which still have not started one year after all actors agreed on their positions (April 2025). The Polish presidency of the Council is stalling further negotiations. There is thus a big risk that this law will be further delayed or even abandoned. In addition, the widespread uptake of the new rules is at risk because in the current state of negotiations, they would not apply to many market participants such as small and medium-sized enterprises. The proposal does not foresee putting limits on extremely harmful practices of high-emitting transport services.

*'The regulation is a step in the right direction. For the first time, battery electric vehicles are not magically 'zero-emission'. However, the production and recycling of a vehicle was omitted, therefore the regulation still gives an unfair advantage to battery electric vehicles produced outside Europe. Without addressing the elephant in the room, the EPP cannot support this regulation.'*

Barbara Thaler, former MEP European People's Party (EPP), 10 April 2024

## WHAT'S NEXT?



### STATUS

**Pending/unclear**

Both the Council (4 December 2023) and the European Parliament (4 December 2024) have adopted their positions, and trilogues could have started already since early 2025.

### **Transposition by EU Member States**

The proposal explicitly calls for a harmonised approach and thus foresees no transposition.

### **Revision clauses and reporting duties**

The European Commission (EC) will evaluate the Regulation and its implementation five years after entry into force.

### **Delegated acts and other related legislative action**

The EC may adopt both delegated and implementing acts when deemed necessary, in particular with regard to methodological progress.

## HOW TO IMPROVE IT? OPPORTUNITIES

During the trilogue negotiations, opportunities may arise to ensure: firstly, that the rules apply to all market participants (including SMEs), and that non-motorised transport service options are included in all relevant communications and actions; secondly, that greenwashing is diminished through the use of more accurate primary data; and thirdly, that robust penalties prevent fraudulent practices.

The EC's evaluation five years after the entry into force will be another opportunity to look into these elements.

## FURTHER READING

CE Delft: [Study supporting the Impact Assessment of the CountEmissions EU initiative](#), November 2023