

CountEmissionEU Regulation must be mandatory to have an impact

The Commission's proposal for a new **CountEmissionEU Regulation**, published as part of the **Greening Freight Transport Package (GFTP)**, is greeted by UIRR as a **powerful decision-making aid**. The UIRR position paper¹ published today takes stock of the merits of the proposal and suggests some improvements to it.

In view of the **Electronic Freight Transport Information Regulation (eFTI)** and the **Corporate Sustainability Reporting Directive (CSRD)**, as well as the publicly accessible, easy-to-use and free **EcoTransit calculator**, two provisions of the proposal should be rejected by the legislator:

- 1) The "voluntary opt-in" possibility, and
- 2) The exclusion of small and medium size actors (SMEs).

CountEmissionEU should be mandatory for all transport chains. Most long-distance door-to-door transports have a Combined Transport alternative with far superior energy efficiency and well-to-wheel CO₂ profiles than if performed by a single truck.

SMEs must report their carbon footprint under the CSRD in case they act as a subcontractor of a larger economic actor obliged to report under the CSRD, which is the dominant case in Europe already today. Moreover, the EcoTransit calculator is ISO14083 compliant and free to use. Once the eFTI Regulation is in effect – from 2025 – the EcoTransit calculation will be possible using the digital eFTI data record that will accompany every freight transport movement. This will eliminate any threat of an "additional administrative burden" as the calculation will be an automatic algorithm.

Similarly to labelling the energy and resource efficiency of electronic appliances, UIRR proposes **labelling the GHG of transport chains** based on their well-to-wheel climate gas emission performance calculated by CountEmissionEU. Such labels could be an effective tool for consumers to express their preferences and thereby orient the decisions of shippers and consignors.

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Ralf-Charley Schultze

"The effectiveness of door-to-door Combined Transport in terms of energy efficiency and carbon footprint should be made transparent through a mandatory and all-inclusive application of the CountEmissionEU Regulation." – pointed out UIRR President Ralf-Charley Schultze.



Who is UIRR?

Founded in 1970, the **International Union for Road-Rail Combined Transport (UIRR)** represents the interests of European road-rail Combined Transport Operators and Transhipment Terminal Managers.

Road-Rail Combined Transport (CT) is a system of freight forwarding which is based on efficiently and economically inserting electric rail into long-distance (road) transport-chains through the use of intermodal loading units (ILU).

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¹ <https://www.uirr.com/en/media-centre/press-releases-and-position-papers/2023/mediacentre/2689-position-paper-countemissioneu-regulation-must-be-mandatory.html>