

ECSA position on the CountEmissions EU proposal

ECSA welcomes the Commission's proposal on the accounting of greenhouse gas emissions of transport services (CountEmissions EU).

Accounting emission file across transport sectors

The European Community Shipowners' Associations (ECSA) supports the establishment of a uniform greenhouse gas (GHG) emissions accounting methodology across different modes of transportation in the EU. This will provide clear and unambiguous GHG emissions data, which is essential to compare the emissions of different entities.

Although the current proposal is an ambitious step forward, there is still room for improvement concerning the administrative burden for shipowners when reporting and monitoring GHG emissions and the interlinkages of the CountEmission EU initiative with existing methodologies on GHG emissions reporting, such as the EU MRV.

Interlinkages with existing methodologies on GHG emissions

Reporting of shipping emissions is already mandatory under EU MRV. Therefore, European Shipowners already perform an exhaustive monitoring and reporting of the GHG emission on their fleets. In addition, the reporting requirements will be extended as of 2024 and 2025 through parallel/complementary European requirements such as the EU ETS and the FuelEU Maritime. Therefore, ECSA urges policy makers to ensure that shipping emission taken into account under CountEmissionsEU are those already reported under the EU MRV. Unfortunately, the EU MRV is not mentioned directly in the Commission proposal.

ECSA strongly supports the Council's amendment to Article 6, which provides that the shipping default greenhouse gas emission intensity data should be derived automatically from the "Thetis-MRV" database and complemented, where applicable, with other sources of information such as the FuelEU database. ECSA supports the Council position, which emphasizes the need to make use of the already available and reported data under the EU MRV instead of creating new GHG reporting requirements, which would result in a duplication of reporting from and in an increase of the administrative burden for the shipping sector.

Diminishing the administrative burden for shipowners

Any GHG accounting methodology should be aligned with the compulsory requirements for shipping under the EU MRV and FuelEU Maritime and should not introduce additional reporting and accounting requirements with their associated administrative burdens, which disproportionately impact small and medium-sized enterprises (SMEs). ECSA fully supports the Council's proposal to make a calculation tool to ease the administrative burden for SMEs (Article 11 of the Council General), because SMEs constitute the backbone of European Shipping.

European Shipowners endorse an uniform accounting methodology, if entities decide to report and that solely on a voluntary basis. The voluntary nature of the CountEmissions initiative for GHG emissions is outlined in Article 2 of the proposal. Hence, this methodology will apply only if the entity decides to disclose disaggregated information on those emissions to any third party for commercial or regulatory purposes.