HYDROGEN EUROPE RESEARCH FEEDBACK
COUNT YOUR TRANSPORT EMISSIONS – 'COUNTEMISSIONS EU'

Hydrogen Europe Research welcomes the European Commission's initiative to tackle greenhouse gas (GHG) emissions accounting from the transport of goods, products, commodities, etc. The emissions have indeed been consistently growing in the past thirty years. To raise awareness and to incentivise market actors to develop cleaner transportation modes, data on the environmental impact of transport and logistics (storage, cooling, loading/unloading, consignment, etc.) must be made available. Therefore, developing a valid, scientifically solid and commonly accepted framework for calculating GHG emissions of transport is a first step to achieve this.

1   **GHG emissions from their transport represent most of some products' carbon footprint**

GHG emissions from transport and logistics can represent an important share of the total GHG emissions of a product. For example, in the case of renewable hydrogen imported to Europe, its transport and logistics would be the main source of emissions compared to if it was produced locally (especially if the transportation mode transporting it operates with fossil fuels). Therefore, it is necessary to have data on the GHG emissions released during the transport and logistics of goods, in order to be able to compare the carbon emission of a product during its journey and lifecycle. For this data to be valid, scientifically solid, commonly accepted and comparable, the boundaries of the calculation must be set in a common methodology.

2   **The boundaries of the common methodology should be from cradle to grave**

In order to stick as close as possible to actual emissions, the boundaries of the methodology should be from cradle-to-grave. A cradle-to-grave approach would offer a comprehensive view of the entire emissions emitted. Furthermore, it will allow for a fair comparison of different transport technologies' emissions available for freight and passenger transport (e.g. ICE, BEV, FCEV) which are to this day not taken into account.

3   **The common methodology should build on the ISO EN 16258**

Transport emissions accounting and reduction must be tackled at a global scale due to the international features of transportation. Therefore, existing international standards such as the ISO EN 16258 norm must be the basis of the work at European level.

The work of the Global Logistics Emission Calculation (GLEC) should also be considered in this regard. Beyond what is included in the ISO standard, biogenic carbon and emissions from indirect land use change (ILUC) should be considered. Improvements on existing international standards will foster the wide spreading of such methodologies.

4   **Accounting for GHG emissions from transport and logistics will support the development of cleaner transports alternatives**

Providing data on the GHG emissions of different transportation means will encourage the uptake of greener practices. When looking at freight, new technologies are in development and could have a positive impact on the environment and the climate. The awareness of stakeholders and consumers on the emissions produced from the transport of goods is a needed push to decarbonise supply chains and habits.

5   **GHG emissions are only one aspect of transport pollution, other pollutants should be accounted for**

To provide a comprehensive view on the environmental impact of transports, air pollutants should also be included in the reporting scheme. Defining a common methodology to account for GHG emissions is a first step, however, the methodology should be completed with additional tools providing a full picture of the impact of transport on air quality to avoid conflicting policies.

Hydrogen Europe Research is an international, non–profit association composed of more than 120 Universities and Research & Technology Organisations (RTO) from 27 countries in Europe and beyond. Our members are active within the European hydrogen and fuel cell sector.

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