

Input from the 2030-secretariat: Count your emissions

The Swedish 2030-secretariat has shared its views on the EU Count your emissions using the online service provided. We here want to emphasize our key messages:

- It is important that there are concrete emission figures for all parts of the transformation of the transport sector, and that these are harmonized between EU member states, as well as between different sectors, so that the same phenomenon, fuel, transport etc. does not get different values depending on where it is counted.
- The calculation of emissions *must* be based on a cradle-to-grave or well-to-wheel perspective. Whilst we prefer the former, we realize that this will often be hard to achieve, but insist that tailpipe figures are not adequate to use. It is not only simplified, but also gives a completely false picture for both electromobility and biofuels, favoring the fossil fuels the EU aims to phase out (coal, oil, natural gas). In the first case, all vehicles powered by electricity receive a zero emission value, in the second, all vehicles powered by biofuels receive similar emission levels as the fossil fuels they are to replace, even though their real-life climate impact is significantly lower.
- The timeframe for W2W or C2G calculations needs to be clarified, for renewable energy/biofuels it is vital to use a fairly short - but not very short - lifespan, taking into account to urgency of combatting climate change.
- All emissions accounting should be third party-verifiable, comparable across sectors and between nations. Since electricity grid emission factors change, this also means that it is important to keep accounting up to date, and to have a high degree of transparency when it comes to figures being used.
- We believe in "start big, then go small"; reporting GHG emissions should be mandatory for large companies and operators in much the same way that reporting according to the taxonomy is.
- For products and services with a high climate impact, actual GHG emissions W2W or C2G should be presented immediately next to the point of consumption or purchase (the filling station for vehicle fuels, the booking service for airline travel etc). Over time, more products and services should be covered.
- Individual member countries that wish to act beyond and/or before the common EU framework in ensuring accurate, transparent and publically available GHG emissions data should be encouraged to do so.

For the Swedish 2030-secretariat, the 15th of November 2022

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