

Hydrogen Europe response to the CountEmissionsEU call for feedback

Hydrogen Europe welcomes the opportunity to provide feedback on Count Emissions EU consultation and supports the proposal for a common framework to calculate GHG emissions of transport operations in the freight and passenger transport sectors.

Within the overall decarbonisation targets set out in the European Green Deal, it is of key importance that European transport and logistics companies can rely on clear and binding regulatory framework, as well as efficient and streamlined processes. It is equally important that such new system facilitates the uptake of zero emission solutions, notably hydrogen-fuelled applications, that can deliver substantial emissions reduction all along the value chain in all transport sectors.

When it comes to designing the new framework, coherence and complementarity with all flanking measures has to be ensured. It is also important that multimodality is properly addressed: GHG calculation methodologies differ for each transport mode; those specificities shall be reflected into the new framework.

Lastly, the new framework should consider the impact of fleets on energy systems. It has to be noted that as regards hydrogen, positive synergies often remain ignored and the whole energy system efficiency via sector coupling through P2G is set aside (whilst coupling with transport and heating are promoted in most actions and legislation). Hydrogen is key to integrate more renewables and guarantee more flexibility at the best cost for all Europeans. It is an energy carrier, an efficient transport fuel and has a natural complementarity with all renewable electricity, and reduces demand for critical raw resources that will be needed for the energy transition.