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## FEPORT Position regarding Consultation on Harmonising Carbon Footprinting Measures

On 21 March 2014 the European Commission launched a consultation on *promoting the development of harmonized carbon footprinting measures for both freight and passenger transport services in Europe*. FEPORT, the European organization representing the interests of the terminal operating companies located out of the sea ports of the European Union, has taken into consideration this questionnaire and believes there is potential for a proactive discourse between legislators and the industry on this issue.

### Overview

Firstly, it is important to stress that it is in a terminal operator's interest to be aware of their carbon emissions. High carbon emissions are often a result of high fuel consumption which, in turn, leads to higher operating costs for any business. As a private operator, a terminal operator subsequently has a vested interest in reducing such costs where possible without having a negative impact on performance.

Through the EU Ports EEIG (European Economic Interest Group) Environment Group, Europe's largest terminal operators have agreed on a methodology for greenhouse gas emissions footprinting for container terminals. The intention is that with this methodology, terminal operators can track their carbon footprint using this methodology and subsequently take action to reduce emissions where possible. Given that all port and terminal operators are unique, these measures will vary from terminal to terminal.

### Moving Forward

Given that terminal operators have taken steps to develop a methodology for calculating carbon emissions, FEPORT would propose that the Commission takes into consideration industry best practices when discussing harmonized carbon footprinting measures for freight and passenger transport services in Europe. It is possible that other transport services have created similar methodologies. FEPORT believes that the Commission should support industry initiatives in this regard and refrain from introducing contradictory methodologies.

FEPORT believes any form of benchmarking on carbon footprinting is unrealistic. If the Commission was to benchmark across transport modes, the Commission would need to establish a common denominator across all modes which could then be calculated. This is an essential first step in comparing two completely different modes of transport (i.e. road haulage and aviation). Further questions need to be asked such as what is the added benefit of setting benchmark's and who is being benchmarked? The Commission would also need to enquire into the availability of information (i.e. is it possible to collect the needed information from small companies (i.e. road haulage) without creating unmanageable administrative burdens)? FEPORT would therefore advise against a discussion on benchmarks unless further clarification is provided on these concerns and industry actors are consulted into the viability of benchmarks.

FEPORT would also strongly advise the Commission against creating a system whereby transport modes could be compared. Such a system could be extremely misleading (how do you compare maritime transport and aviation) and inaccurate (for instance; when would road haulage end and the container terminal begin). Yet again, FEPORT does not see the added benefit in comparing transport modes as all transport modes serve a function in the wider logistical chain.

### Conclusions

FEPORT would recommend that the Commission supports industry initiatives to create methodologies for calculating their carbon footprint. As stated, emissions are usually linked to operating costs and it is therefore in the interest of a private operator to reduce their emissions where appropriate. This can only be achieved by the creation of methodologies. The Commission can raise awareness of best practice and, where possible, assist the industry in developing methodologies.

Benchmarking should be avoided as it does not have a clear added value and, for the time being, it is extremely difficult to establish who is being benchmarked and how. Any system where results can be compared should also be avoided as any results would be misleading and inaccurate given the complex interactions between transport modes.