



Denmark's priorities for the transport sector

In the upcoming years, the EU needs to strengthen its competitiveness, develop its own capacities, and become more robust and resilient. The European transport sector is imperative for reaching the aim of increased strategic autonomy and security of supply of the EU. Furthermore, an ambitious green transition is a prerequisite to making the EU better positioned in strategic competition with increased energy security as well as better growth opportunities for the EU's industry.

As one of the fundamental pillars of the European Single Market, enabling the free movement of people, goods, and services, the European transport sector is essential for strengthening the EU's competitiveness and reaching its ambitious climate targets¹.

With respect to several modes of transport, the EU is a regional stronghold in a global setting. The EU should adopt strategies to ensure the competitive edge of the transport sector both short-term and long-term. This non-paper may be supplemented by further non-papers elaborating Danish priorities with respect to some specific modes of transport.

From a Danish perspective, there are two crosscutting points that the Commission should prioritise in the coming years to ensure a strong, competitive, green and resilient transport sector:

1) efficient implementation and 2) decarbonising each and all transport modes.

Efficient implementation of legislation adopted during the current mandate period is significant for a well-functioning and competitive transport sector

With the adoption of the many files regulating the transport sector during the current mandate period 2019-2024, the time has now come to focus on implementation. The emphasis on implementation is also highlighted in both the Letta report and the Draghi report.

Efficient implementation is not only important to ensure that policy objectives are achieved. It is also necessary to minimise the cost of EU legislation for national authorities and the industry which could otherwise have negative knock-on effects for the functioning and competitiveness of the transport sector. We

furthermore urge the Commission to take into consideration that the complexity and volume of EU regulation already pose challenges for actors in the transport sector. This is particularly evident in the railway sector where complicated rules and procedures inhibit new players from entering the market. A profoundly high level of competence and sector knowledge is required from new entrants. This is a significant market barrier that effectively blocks healthy competition.

Without the necessary focus on effective implementation, including on the costs of Union

¹ Regarding Denmark's main priorities for a 2040 climate target and climate architecture we refer to the non-paper: *Denmark's position paper on an ambitious EU 2040 climate target and a cost-effective EU climate architecture.*



legislation for both national authorities and the industry, the functioning and competitiveness of the transport sector will be negatively affected.

To ensure a timely transition, we must focus on decarbonising each and all transport modes

The need for ambitious climate action, including in the transport sector, has never been more evident. Denmark supports a 2040-climate target of at least 90 pct. reduction of CO₂ equivalents compared to 1990 levels. To reach this target we must decarbonise all transport modes. Focus should in particular be on developing necessary instruments to decarbonise hard-to-abate transport sectors.

A timely transition cannot be reached by focusing only on modal shift, e.g. from road to rail, as it is rarely the most CO₂ efficient method

The transition of road transport to zero emission technologies is thus crucial as road transport accounts for the largest part of greenhouse gas emissions from the transport sector. This should largely be solved by the transition to zero-emission vehicles. In Denmark, the contribution to the transition from a modal shift will be limited. It is therefore of pivotal importance that proper attention be given to how further CEF funds could be allocated to facilitate the green transition of road transport – particularly the road haulage sector.

Following the technological developments, a timely transition calls for a focus on long term solutions – as opposed to transitional technologies that are neither scalable nor can provide near full decarbonisation.

Denmark underlines the importance of the Fit-for-55 transport files, including the 100 percent CO₂ reduction target for new cars and vans in 2035. Denmark regards the Emissions Trading Scheme (ETS), the CO₂-emission standards for new light and heavy-duty vehicles and the Renewable Energy Directive as key drivers to reach the EU's climate goals. These files have revision clauses which allow for adjustment of policy measures to ensure that they will deliver the necessary reductions.

The on-going revision of the Weights and Dimensions Directive will also support the transition by compensating the added weight from zero-emission technologies and creating a bonus in terms of increased loading capacity on zero-emission vehicles and vehicle combinations.

Emissions (g CO₂) per km, per person for different transport modes

CO₂ emissions from passenger transport vary greatly. Below is a calculation of CO₂ emissions per kilometer, per person for different transport modes in Denmark. When comparing CO₂ emissions from electrified cars and trains, there is little difference. Specifically, in cases where the train capacity is not used, e.g. because of low population density, trains are not CO₂ efficient.

Average diesel or gasoline vehicle	99
Average battery electric vehicle	15
Intercity train (diesel)	42
Regional train (diesel)	81
Regional train (electric)	9
Plane (jet engine)	301

Source: Danish Ministry of Transport. Calculation based on transport unit prices and data from the Danish State Railway, Copenhagen Airport, Danish Road Directorate and the Danish TSO Energinet.

– and often not feasible at all. Modal shift should in general only be pursued when it represents a better socio-economic alternative to an equivalent unimodal road transport.



Another key element for the transition is efficiency. The revision of the Weights and Dimensions Directive is also essential in this regard, as optimising the amount of freight moved per unit will benefit both the climate, environment and businesses.

By focusing on efficient implementation and decarbonising each transport mode in the coming years it will be possible to unlock the potential of the transport sector, which will strengthen the EU internally, keep the EU's industry competitive and ensure that the EU's climate goals are reached.