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## Danish Non-Paper on the consultation on the revision of the policy on monitoring, reporting and verification of CO2 emissions from maritime transport

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Denmark appreciates the effort to align the two sets of international rules on monitoring, reporting and verification of CO2 emissions from maritime transport, and the Danish Government welcomes the opportunity to comment on the Commission's public consultation on this matter.

The Danish Government finds it positive and relevant that the Commission has initiated a process to align the MRV-regulation with the IMO DCS-regulation.

As the maritime transport is responsible for approximately 2.5 % of global GHG emissions, Denmark finds it important to monitor and report the GHG emissions from the sector in order to establish relevant and adequate measures to reduce the sector's GHG emissions in the long run and to ensure that the sector contributes to achieving the long-term goals of the Paris Agreement. The measures should contribute to the global goal of GHG reductions and should be applied in a non-discriminatory manner to all ships, regardless of their flag.

To ensure a reasonable administrative burden, Denmark is in favour of aligning the one system rather than two (as is currently the case with MRV and IMO DCS) and appreciates the good work that has been carried out in this regard.

Denmark supports a system that will drive forward the development of a green maritime sector, which should also focus on energy efficiency in the maritime transport sector. In that context, Denmark finds it relevant that provisions for "transport work" also includes calculations based on the actual cargo carried, which implies that the current definition in MRV annex II, A, 1., (c) should be maintained. Maintaining this definition assures that the energy efficiency of ships will also be part of the data that will be collected and will form the base for the future regulation of the sector. Denmark considers this issue very important and would consequently encourage that it is considered to maintain the MRV-regulation with its adequate definition of transport work, if it is not possible to negotiate a common definition of transport work that includes cargo carried.

Denmark emphasises the need for transparency but could fear that the MRV rules, which favour transparency on single ship level, could interfere with the trade secrets of ship owners, whereas the transparency rules of the IMO DCS do not seem to pose this risk.

Denmark can therefore support the ongoing work to align the rules that regulate and reduce GHG-emissions from the maritime transport sector. At the same time, Denmark is of the opinion that the regulation should include measures on cargo carried by ships in order to reflect the energy efficiency of ships.