[redacted]
Federal Chancellery

22 September 2026, Brussels

EU Methane Regulation - A clear and strong German position is needed ahead of the Informal Energy Council meeting taking place 29 September in Dublin

Dear Mr[redacted]

We are writing on behalf of the co-signatories regarding the implementation of the EU Methane Regulation (EUMR) and, in particular, the imminent importer requirements due to apply from 1st January 2027 that risk to significantly increase natural gas, crude oil and petroleum prices for industries and citizens.

The urgency of this issue has now been recognised at the highest political level. In his letter of 18 September to European Commission President Ursula von der Leyen, French President Emmanuel Macron explicitly called for postponing the EUMR's importer reporting obligations, warning that their insufficiently prepared implementation could further jeopardise Europe's energy security amid deteriorating supply conditions.

With January 2027 deadline approaching, we urge Ministers to discuss the EUMER during next week's informal meeting in Dublin, scheduled to discuss energy affordability and European energy security. A clear and strong German position would be particularly important in enabling a pragmatic European solution.

The matter has now become urgent given that in just over three months, the main importer requirements will begin to apply. While we remain fully committed to contributing to the EU's climate neutrality objective and to reducing methane emissions across global energy supply chains, important elements needed to demonstrate compliance are still not fully defined nor are operational. The urgency results from the approaching legal deadline and the remaining gap between the Regulation's requirements and the tools available to companies to meet them.

For Germany, the consequences deserve particular attention. If the EUMR is implemented under the current conditions and timetable, it will undermine:

- the Federal Government's efforts to shield households and businesses from high energy costs as addressed in your recent proposal to reduce fuels prices. By restricting access to otherwise available oil and gas supplies, it will put additional upward pressure on energy prices for German households and businesses.
- Germany's major strategic effort since 2022 to diversify its energy supplies following the loss of Russian pipeline gas: LNG import infrastructure, new supply relationships and alternative routes are key for the resilience of the German energy system. At a time of renewed geopolitical uncertainty and volatility in international energy markets, preserving that diversification remains essential.

The current implementation timetable risks creating an additional and this time self-inflicted crisis at the time when energy markets are already facing significant pressures and elevated prices. An in-depth study estimates that **up to 43% of EU natural gas imports and 87% of crude oil imports could be at risk by 2027, potentially driving natural gas prices to historically high levels and increasing diesel prices by 16% and gasoline prices by 24%.**

The risk of non-compliance stems mainly from the European Commission's delayed development and clarification of the implementation tools for industry to meet the requirements (including verification and accreditation frameworks); as well as uneven global uptake of methane emissions monitoring.

The Commission tried to address those concerns by issuing recommendations on penalties and compliance solutions in July. However, these non-binding measures cannot amend the legal obligations established by the Regulation and do not provide sufficient certainty to companies contracting supplies for 2027 and beyond. On June 2026 Energy Council, 17 Member States supported the call for urgent targeted amendments to the EUMR.

We therefore respectfully encourage the Federal Government to support the urgent targeted amendments, in particular the three-year postponement of the EUMR's importer requirements currently due to apply in 2027 and 2028, and the disproportionate and practically unfeasible requirements imposed on domestic oil & gas producers.

This would provide the time needed to put the necessary compliance framework in place, while preserving the Regulation's methane-reduction objectives and safeguarding Europe's security of supply, affordability and industrial competitiveness.

The Oil & Gas industry wants a regulation that is efficient, proportionate and that it can comply with, and remains at your disposal to provide any further information that may be useful ahead of the Informal Energy Council.

Yours sincerely,

The co-signatories

bdew Energie. Wasser. Leben. BDI BVEG DVGW

en2x IOGP International Association of Oil & Gas Producers VCI