

Brussels, 20 July 2026

Making the EU Methane Regulation work

Energy Traders Europe represents the wholesale energy trading interests of the firms that import gas and keep it flowing across Europe's internal market. We write to reaffirm the importance of postponing those importer obligations under the EU Methane Regulation that are currently unworkable, and to offer our help in creating the necessary frameworks whereby imports can continue in ways that comply with the legislation.

Importers want to comply — but the tools to do so are not yet in place

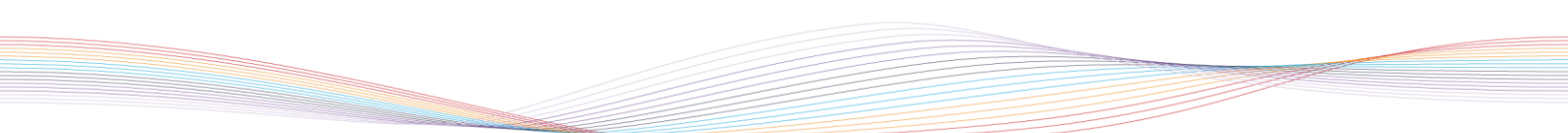
Our members fully support the objective of reducing methane emissions. However, certain importer obligations under Chapter V take effect on 1 January 2027 and 5 August 2028 respectively, before the frameworks needed to comply with them exist. Relevant preconditions, like technical standards, accredited verifiers, recognised verification protocols and certification schemes are not yet available at the scale required across exporting countries, and will realistically take around three years to build. With these deadlines, the Regulation places EU importers in a position of non-compliance — not through any lack of effort, but because of the missing compliance frameworks.

The Recommendations now published confirm the problem rather than solve it

The Commission has published two Recommendations under the Regulation — one on the application of penalties (Article 33), and one on optional model clauses and compliance solutions (Article 28(3)). We welcome the pragmatic intent, but neither instrument resolves the difficulty. Both are non-binding, and neither changes nor postpones the underlying obligations. They do not give importers the legal certainty needed to conclude supply contracts, nor do they guarantee uniform application across Member States.

On penalties, Member States are invited not to apply certain penalties for obligations due in 2027–2029 for contracts concluded or renewed until 1 January 2028. This is welcome but insufficient, with an unclear endpoint. It leaves the obligation intact, leaving importers in a non-compliant position, and it offers nothing for contracts concluded after that date.

The Commission's Recommendation recognises this legal uncertainty — the lack of clear penalty regimes across Member States and the inability to assess compliance risk — as a major factor preventing importers from signing or renewing supply contracts. A non-binding grace period does not remove that uncertainty.



On compliance solutions, the Recommendation presupposes the very infrastructure that does not yet exist: its model clauses require sellers to demonstrate MRV-equivalent production from 1 January 2027, while its own criteria — third-party audits of producers, and cross-checking between providers' registries before issuance — confirm that a certification framework usable with legal confidence is years, not months, away. Cross-recognition between Member States extends only to a duty to "take into account" another authority's decision, short of the mutual recognition a single market would require.

Our ask: a targeted postponement of the application of the importer obligations

We therefore urge you to maintain and press the call that you and other Member States have already made for an urgent postponement of the application of these importer obligations. Our priority is a targeted delay of the two obligations that cannot be met until the missing frameworks are in place:

- **Article 28 paragraphs 1 and 2 (MRV equivalence)** — postponed by three years, so that the necessary technical standards, procedures and guidance for accreditation and verification, approval of certification schemes and verification capacity can be developed to allow importers to meet the obligations; and
- **Article 29 paragraph 1 (methane intensity reporting)** — postponed accordingly, as it builds on art. 28 data, a delegated act on how methane intensity is to be calculated, which is not yet available, and certification solutions yet to be approved and scaled.

This does not weaken the Regulation's ambition, nor delay its ultimate methane-intensity objective. Obligations should apply only when they can genuinely be met. The best legal mechanism to achieve this postponement is for the Commission and Council to determine, building on the approach several Member States have already tabled.

Our offer

Energy Traders Europe brings the practical, trader-side expertise to make these provisions workable. We stand ready to support Member States and the Commission in designing an implementation timeline and the accompanying compliance tools to deliver real methane abatement without forcing importers in a state of non-compliance and unintentionally compromising security of supply. We would welcome the opportunity to discuss how best to take this forward as well as further measures to close the compliance gaps quickly.

