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NOTE

From: General Secretariat of the Council
To: Delegations

Subject: AOB for the meeting of the Transport, Telecommunications and Energy Council on 15 December 2025
Implementation solutions for the import requirements of Regulation (EU) 2024/1787 on the reduction of methane emissions in the energy sector
- Information from the Commission

Implementation solutions for the import requirements of Regulation (EU) 2024/1787 on the reduction of methane emissions in the energy sector

Information note from the European Commission

The Regulation (EU) 2024/1787 on the reduction of methane emissions in the energy sector (the EU Methane Regulation) entered into force on 4 August 2024 and it contains a number of requirements on importers of crude oil, natural gas and coal placed on the EU market. They must notably report certain methane emissions-related data and information from countries and companies producing or exporting to the EU, and, from 2027, for contracts concluded or renewed after 4 August 2024, they must demonstrate that oil, gas and coal are from production that is subject to measuring, monitoring, reporting and verification (MRV) of methane emissions equivalent to those set out in the EU Methane Regulation.

Market operators, notably suppliers to the EU as well as importers, are seeking certainty about which solutions would be considered acceptable for demonstrating compliance in a stable and predictable manner. The EU needs simple and pragmatic implementation of the regulation in a way that ensures predictability and certainty for markets and security of supply throughout the Union. A reopening of the legislation would create unnecessary uncertainty.

To demonstrate compliance with the import requirements, evidence needs to be provided to the **competent authorities of the Member State in which the importer is established**.

Implementation is done at national level. The EU Methane Regulation is open to different **compliance solutions**, as it does not specify any concrete means or requirements for evidence of compliance.

Where an importer has a direct relationship with a producer or can identify the producer indirectly through contractual relationships with intermediaries, evidence as well as methane-measurement, reporting and verification related information can be passed down the supply chain, as part of or together with, the contracts between contracting parties, all the way down to the importer for final delivery to the relevant competent authorities in the EU. Importers can present **relevant documentation as evidence of compliance with the above import requirements**.

For more complex cases, where a direct or indirect relationship between the producer and importer is challenging or impossible to establish due for instance to the practice of mixing together different supplies of gas or oil for transport or storage, the Commission has identified solutions for a simple and predictable implementation. The Network of Competent Authorities, established under the EU Methane Regulation and comprising authorities of all Member States, examined such solutions and found that they present workable ways to demonstrate compliance. These solutions include either (a) a certification method or (b) a 'trace-and-claim' method. Both options can be implemented in a manner that does not add significant costs or administrative burden, without constituting a risk to supplies and provide certainty of compliance for the entire duration of contracts.

To provide certainty and predictability to markets and operators, Member States are invited to signal their intention as regards implementation, as their national competent authorities are responsible for deciding on compliance with the EUMR in this context. A collective signal by Member States at political level can provide greater certainty to the market and support compliance with the EU Methane Regulation.

In addition, the role of penalties in affecting EU security of supply should also be addressed by Member States to ensure a consistent approach on the matter. Specifically, the EU Methane Regulation (Article 33) requires Competent Authorities not to endanger security of supply when applying penalties. It is therefore paramount that national penalty regimes reflect the possibility to adjust the application of penalties in case energy security is affected, e.g. disruptions or delays of supplies or cost increases. As agreed in the Network of Competent Authorities, the Commission will continue facilitating this work to get to a common understanding in this regard.

The Commission services continue their active engagement with market operators, supplier countries and Member States for a simple, predictable and solid implementation. In addition to work on the Methane Regulation's import related provisions, the Commission is identifying challenges and options as regards provisions applying to methane emissions in the EU.
