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From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	5 March 2025
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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Subject:	COMMISSION RECOMMENDATION of 5.3.2025 on the implementation of the gas storage filling targets in 2025

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Delegations will find attached document C(2025) 1481 final.

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EUROPEAN  
COMMISSION

Brussels, 5.3.2025  
C(2025) 1481 final

## **COMMISSION RECOMMENDATION**

**of 5.3.2025**

**on the implementation of the gas storage filling targets in 2025**

## COMMISSION RECOMMENDATION

of 5.3.2025

### on the implementation of the gas storage filling targets in 2025

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 292 thereof,

Whereas:

- (1) Regulation (EU) 2022/1032 of the European Parliament and of the Council of 29 June 2022 amending Regulations (EU) 2017/1938 and (EC) No 715/2009 with regard to gas storage introduced binding minimum gas storage targets to enhance energy security and resilience in the Union. The implementation of these targets has been instrumental in safeguarding gas availability, especially during periods of high gas demand and market volatility and uncertainty, as evidenced by the EU's gas storage facilities reaching a filling level of 90% or more ahead of each of the last three winters. Gas storages continue to provide for 30% of the EU's winter gas consumption and flexibility to the electricity system.
- (2) The situation on the European gas market has improved considerably since 2022, although the exposure to price volatility remains notably due to the higher share of LNG in the European energy mix and increased competition for global LNG supplies under the geopolitical context.
- (3) Since November 2024, the European gas market experiences a situation when contracts for gas deliveries during summer 2025 are more expensive than contracts for gas deliveries during the winter 2025-26 (negative summer – winter price spread) and as a consequence, commercial incentives for gas undertakings to store gas for next winter are weaker than in the previous filling seasons.
- (4) At the same time and while the gas demand in Europe has dropped by almost 20% since 2022, the gas storage levels at the end of the heating season 2025 are expected to be lower compared to the last two years, although similar to the pre-crisis average filling levels<sup>1</sup> and significantly above 2022 levels. This will require injection of more volumes over the summer to fill the storages ahead of the winter 2025/2026 compared to the previous two seasons.
- (5) In this volatile and complex environment, it is crucial to maintain the essential role of gas storage facilities in ensuring security of supply by upholding the mandatory 1st of November filling target. At the same time, providing Member States with sufficient flexibility to fill storage facilities throughout the summer season at optimal purchase conditions, will reduce system stress and avoid market distortions under current market circumstances.

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<sup>1</sup> Reference is made to the average filling levels at the end of the gas winter, on 1 April for the years 2017-2021.

- (6) It is equally important in this context to abstain from national measures that may negatively affect the gas market or compromise the energy security situation in another Member State or of the European Union. Where there are entities mandated to implement gas storage filling, these should strive to pursue prudent trading strategy that seeks to avoid a significant negative impact on the spot and derivatives markets.
- (7) The gas storage provisions currently in force, in particular Article 6(a) and 6(b) of Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) No 994/2010, expire in December 2025.
- (8) This implies that the flexibility to fill storages throughout 2025 must be sought within the existing legislative framework. Guidance on how to identify and apply flexibility provisions within the existing legislative framework may assist the Member States to better coordinate and smartly design their storage filling policies ahead of winter 2025/2026.

HAS ADOPTED THIS RECOMMENDATION:

1. It is recommended that Member States, when designing and implementing national measures to comply with storage obligations, ensure that such measures do not distort the internal energy market or negatively affect the energy security of other Member States or the Union, and consult the Gas Coordination Group (GCG) for that purpose. Coordinated action is essential to maintaining the integrity of the common market and ensuring equitable energy security across the Union.

2. Member States are recommended to review the implementation of temporary measures that have been introduced to support the filling trajectories and the 1<sup>st</sup> of November filling target, reconsidering notably their impacts on the functioning of the internal energy market. Member States are also recommended to consider, when designing such measures, their impact on the stability and orderly functioning of derivatives markets. Member States are recommended to verify that the entities in charge of implementing the strategies, if any, have the necessary expertise of trading in energy markets, including of the appropriate hedging strategies.

3. It is recommended that Member States take into consideration the actual market conditions when deciding on the measures regarding the filling level of the storages throughout the year. When addressing deviations from the filling trajectory and deciding on the possible enforcement steps, the Commission will provide more flexibility by taking into account the specific developments on the gas market and the effects that they may have on the fulfilment of the filling targets.

4. According to Article 6a(2) of Regulation (EU) 2017/1938, Member States which have significant underground storage capacity and which would be disproportionately affected by the obligation to meet the filling target for the underground gas storage facilities on their territory may store a volume that is based on 35% of their average annual consumption over the past five years. Furthermore, according to Article 6a(5) of Regulation (EU) 2017/1938, Member States with substantial LNG storage infrastructure (above 4% of their average national gas consumption over the past five years) may count LNG storage toward their 1<sup>st</sup> of November filling target. Member States are encouraged to make use of these provided flexibilities.

5. In accordance with Regulation (EU) 2017/1938, Member States are obliged to take appropriate measures to meet the 1<sup>st</sup> of November filling target. Nonetheless, the Commission recalls that Article 6a(8) provides some flexibility when a Member State faces technical

issues such as pipeline constraints or injection facility problems, allowing the Member State to fulfil the filling target by 1<sup>st</sup> of December. The Commission may consider specific market conditions leading to exceptionally low injection rates to be on equal footing with specific technical characteristics. However, this is without prejudice to the obligation of the Member State in question to provide reasonable and detailed arguments for why the mandatory target could not be fully met.

Done at Brussels, 5.3.2025

*For the Commission*  
*Dan JØRGENSEN*  
*Member of the Commission*

