

**LT comments for Methane Regulation (for Presidency compromise proposals in dok.
No. WK 13052/2023 and doc. No. WK 13053/23)**

- Ar. 2, Definitions. LT is in favour the Presidency's compromise proposals.
- Inspections (Art. 6). LT is in favour the Presidency's compromise proposals.
- Monitoring and reporting (Article 12):
 - Art. 12(1) (line 202): The minimal reporting deadline of 10 months foreseen in the brackets of the compromise proposal is too short, we suggest maintaining the maximum proposed deadline of 18 months.
 - Art. 12(2) (line 203): The reporting deadline of 12 months on emissions-based measurements foreseen in the brackets of the compromise proposal is significantly too short, we suggest keeping longest proposed deadline of 24 months.
 - Art. 12(3) (line 204): The site-level emission measurement assessment deadline of 24 months foreseen in the brackets in of the compromise proposal of the compromise version is considerably too short, we suggest keeping the longest proposed deadline of 36 months.
 - Art. 12(6) (line 211): We do not support the suggestion reporting emission source type in CO₂ equivalent. It raises concern because there will be different values for GWP (global warming potential) among EU operators. Moreover, it should be noted, that the Regulation specifies to use the OGMP 2.0 reports, which do not include a CO₂-equivalent estimation. In this regard we propose not to use the CO₂-equivalent estimation.
- Leak detection and repair (Article 14 and Annex 1).
 - Art. 14 (2) (line 227): The deadline of 9 months foreseen in the brackets for the first leak detection and repair is too short. We suggest that the first leak detection and repair (Type 2 LDAR) should take place at least 12 months after entry into force of the Regulation.
 - Art. 14 (3) (line 229): We support the highest detection limits of the ranges foreseen in the brackets.
 - Art. 14 (4a) (line 231). The compromise text contains a provision on notification of repair and monitoring schedule to the responsible authority on all leakages found and it should be done no later than 10 days after detection. We believe that it will be difficult to prepare within 10 calendar days, so we would suggest at least clarifying that it should be within 10 working days.
 - Art. 14 (7) (line 239). We would prefer that the reporting should be done on an annual basis rather than 6 months.
 - Annex I (line 428). The compromise text provides frequency intervals for leakage tests. We suggest keeping the longest proposed frequency intervals for the leakage tests.



Council of the European Union
General Secretariat

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CONTRIBUTION

From: General Secretariat of the Council
To: Working Party on Energy

Subject: LT comments on Methane Regulation (WK 13052/23)

Delegations will find in the LT comments on the Methane Regulation (WK 13052/23).