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General Secretariat

**Brussels, 28 October 2025**

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**LIMITE**

**ENER  
POLCOM  
CODEC**

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#### **CONTRIBUTION**

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From:	General Secretariat of the Council
To:	Working Party on Energy
Subject:	REPowerEU Regulation: BG comments (ST 14304/25)

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Delegations will find in the annex the BG comments on the REPowerEU Regulation (ST 14304/25).

Brussels, 22 October 2025  
(OR. en)

14304/25

LIMITE

ENER 544  
POLCOM 306  
CODEC 1592

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**Interinstitutional File:  
2025/0180 (COD)**

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**NOTE**

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From:	General Secretariat of the Council
To:	Delegations
Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on phasing out Russian natural gas imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938

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With a view to preparing the upcoming trilogue negotiations with the European Parliament (EP) on the REPowerEU Regulation, the Presidency considers it necessary to discuss the main elements of the EP position with Delegations. The intention is, in particular, to receive indications from the Delegations on those areas of the EP's position where they find it possible to show flexibility towards the EP.

In the following, the Presidency lists a number of the key elements of the EP's position on which it is considered particularly helpful to receive feedback from Delegations at this stage:

1. **Deadline for ending existing supply contracts**, art. 4, paragraph 3: EP proposes an earlier deadline on 1 January 2027, rather than 1 January 2028. The Council GA maintains the Commissions level of ambition with a deadline on 1 January 2028. Delegations are invited to indicate their flexibility when it comes to setting an earlier deadline, taking into account also the deadline for the prohibition on imports of LNG by 1 January 2027 as expected in the 19<sup>th</sup> sanctions package.

2. **Information requirements for imports and prior authorisation**, art. 7: EP position involves prior authorisation which is quite similar to the Council GA, but proposes a more limited exemption criterion from prior authorisation for non-Russian gas, which is “*gas-producing country which prohibits natural gas produced in Russia*”. In addition, EP proposes a 1-month deadline for prior authorisation for both Russian and non-Russian gas, where the Council GA foresees only 5 work days for non-Russian gas. EP also proposes a number of other changes, in particular to strengthen the documentation requirement for imports to “unambiguous evidence”, and suggests a Commission implementing act to determine minimum standards for this evidence. Delegations are invited to indicate their potential flexibilities on all aspects related to EP’s position on prior authorisation.
3. **Monitoring, transparency and exchange of information**, art. 9 and 10: EP proposes a range of new monitoring and reporting tasks. It proposes that Member States should monitor maritime transport practices in territorial waters, and that the Commission should monitor total volumes of natural gas import, risky LNG terminals, and gas imports through third countries. Delegations are invited to indicate their flexibilities in this respect.
4. **Penalties**, new art. 10a: EP proposes to introduce a new provision establishing an obligation on Member States to introduce penalties. The EP proposal entails both a reference to the general rules for such penalties, i.e. that they shall be effective, proportionate, and dissuasive, and shall include administrative fines, but also a minimum level of administrative fines at 5% of the undertaking’s total worldwide annual turnover for the preceding financial year. The Commission proposal did not include harmonisation of penalties, and the Council position does not include provisions on this issue. Delegations are invited to indicate their flexibilities on this issue.

5. **National diversification plans**, art. 11 and 12: EP proposes a number of additions to diversification plans including a request of a breakdown of the volumes of gas consumed in the MS from Russia, and measures to both ensure traceability of gas from Russia, and that gas traded on spot markets is traceable to country of production. In addition, on oil, EP proposes that the plans should facilitate a phase out in 2026. EP also proposes to expand the plans to oil petroleum products, that Member States should report on measures to ensure traceability of oil from Russia, and on measures to prevent the shadow fleet from entering their territorial waters. It also proposes to empower the Commission to issue a decision on the plans rather than a recommendation, as provided for in the Commission proposal and maintained in the Council GA. Delegations are invited to indicate their flexibilities in this respect.
6. **Review and suspension**, art. 15: EP proposes to delete the whole provision, including the possibility to suspend the import prohibition in case of serious threats to security of supply. Delegations are invited to indicate their flexibilities in this respect.

In addition to the points listed above, Delegations are invited to raise any other relevant elements from the EP position, in particular in other areas where they could show flexibility towards the EP.

**Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on phasing out Russian natural gas imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938**

2025/0180(COD)

Non-versioned [LATEST TEXT]

22-10-2025 at 10h05

	<small>CLEAN</small> Commission Proposal	<small>VS.EC</small> EP Mandate	<small>VS.EC</small> Council Mandate	<small>VS.EC</small> Draft Agreement
Formula				
1	2025/0180 (COD)	2025/0180 (COD)	2025/0180 (COD)	<b>Comments of Bulgaria:</b>
Document Stage				
2	Proposal for a	Proposal for a	Proposal for a	
Document Type				
3	REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL	REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL	REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL	
Document Purpose				
4	on phasing out Russian natural gas imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938	on phasing out Russian natural gas <u>and oil</u> imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938	on phasing out Russian natural gas imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938	
Formula				

	<b>CLEAN</b> <b>Commission Proposal</b>	<b>vs.EC</b> <b>EP Mandate</b>	<b>vs.EC</b> <b>Council Mandate</b>	<b>vs.EC</b> <b>Draft Agreement</b>
5	THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,	THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,	THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,	
Citation 1				
6	Having regard to the Treaty on the Functioning of the European Union, and in particular Articles 194(2) and 207 thereof,	Having regard to the Treaty on the Functioning of the European Union, and in particular Articles 194(2) and 207 thereof,	Having regard to the Treaty on the Functioning of the European Union, and in particular Articles 194(2) and 207 thereof,	We maintain our concerns that Articles 194(2) and 207 of the TFEU do not form a sufficiently sound legal basis for the proposed trade measures.
Citation 2				
7	Having regard to the proposal from the European Commission,	Having regard to the proposal from the European Commission,	Having regard to the proposal from the European Commission,	
Citation 3				
8	After transmission of the draft legislative act to the national parliaments,	After transmission of the draft legislative act to the national parliaments,	After transmission of the draft legislative act to the national parliaments,	
Citation 4				
9	Having regard to the opinion of the European Economic and Social Committee <sup>1</sup> ,  1. OJ C, ...	Having regard to the opinion of the European Economic and Social Committee <sup>1</sup> ,  1. OJ C, ...	Having regard to the opinion of the European Economic and Social Committee <sup>1</sup> ,  1. OJ C, ...	
Citation 5				
10	Having regard to the opinion of the Committee of the Regions <sup>1</sup> ,  1. OJ C, ...	Having regard to the opinion of the Committee of the Regions <sup>1</sup> ,  1. OJ C, ...	Having regard to the opinion of the Committee of the Regions <sup>1</sup> ,  1. OJ C, ...	

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
Citation 6				
11	Acting in accordance with the ordinary legislative procedure,	Acting in accordance with the ordinary legislative procedure,	Acting in accordance with the ordinary legislative procedure,	
Formula				
12	Whereas:	Whereas:	Whereas:	
Recital 1				
13	(1) The unlawful full-scale invasion of Ukraine by the Russian Federation in February 2022 revealed the dramatic consequences of the existing dependencies on Russian natural gas on markets and security. In their Versailles Declaration of 11 March 2022, Heads of States therefore agreed to gradually decrease and eventually fully remove the dependency on Russian energy. The REPowerEU Communication of 8 March 2022 <sup>1</sup> and the REPowerEU Plan of 18 May 2022 <sup>2</sup> proposed concrete measures to allow the full diversification away from Russian energy imports in a safe, affordable and sustainable manner. Significant progress in the process to diversify gas supplies away from Russia was achieved since then. As the remaining volumes of	(1) The unlawful full-scale invasion of Ukraine by the Russian Federation in February 2022 revealed the dramatic consequences of the existing dependencies on Russian natural gas on markets and security. In their Versailles Declaration of 11 March 2022, Heads of States therefore agreed to gradually decrease and eventually fully remove the dependency on Russian energy. The REPowerEU Communication of 8 March 2022 <sup>1</sup> and the REPowerEU Plan of 18 May 2022 <sup>2</sup> proposed concrete measures to allow the full diversification away from Russian energy imports in a safe, affordable and sustainable manner. Significant progress in the process to diversify gas supplies away from Russia was achieved since then. As the remaining volumes of	(1) The unlawful full-scale invasion of Ukraine by the Russian Federation in February 2022 revealed the dramatic consequences of the existing dependencies on Russian natural gas <del>on</del> for markets and security. In their Versailles Declaration of 11 March 2022, Heads of States <del>State</del> <b>or Government</b> therefore agreed to gradually decrease and eventually fully remove the dependency on Russian energy. The REPowerEU Communication of 8 March 2022 <sup>1</sup> and the REPowerEU Plan of 18 May 2022 <sup>2</sup> proposed concrete measures to allow <b>for</b> the full diversification away from Russian energy imports in a safe, affordable and sustainable manner. Significant progress in the process <del>to</del> <b>of diversifying</b> gas supplies away from <del>Russia was the</del>	Bulgaria does not support the proposed by the EP inclusion of nuclear energy in the scope of the REPowerEU Regulation. The proposed extension goes beyond the Regulation's legal and policy framework, which focuses on natural gas and oil.

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>Russian natural gas entering the Union are still significant, the Commission announced in its REPower Roadmap towards ending Russian energy imports of 6 May 2025 a legislative proposal to fully phase out Russian gas imports and to improve the existing framework for energy dependencies.</p> <p>1. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU: Joint European Action for more affordable, secure and sustainable energy, COM(2022) 108 final, 8 March 2022. 2. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU Plan, COM(2022) 230 final, 18 May 2022.</p>	<p>Russian natural gas entering the Union are still significant, the Commission announced in its REPower Roadmap towards ending Russian energy imports of 6 May 2025 a legislative proposal to fully phase out Russian gas imports and to improve the existing framework for energy dependencies. <u><i>In order to achieve full independence from Russian energy imports, it is equally urgent to phase-out Russian nuclear energy imports, in line with the REPowerEU Plan.</i></u></p> <p>1. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU: Joint European Action for more affordable, secure and sustainable energy, COM(2022) 108 final, 8 March 2022. 2. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU Plan, COM(2022) 230 final, 18 May 2022.</p>	<p><b>Russian Federation has been achieved</b> since then. As the remaining volumes of Russian natural gas entering the Union are still significant, <del>the Commission announced in its REPowerEU Roadmap</del> towards ending Russian energy imports of 6 May 2025 <b>the Commission announced</b> a legislative proposal to fully phase out Russian gas imports and to improve the existing framework for <b>addressing</b> energy dependencies.</p> <p><del>1. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU: Joint European Action for more affordable, secure and sustainable energy, COM(2022) 108 final, 8 March 2022. 2. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU Plan, COM(2022) 230 final, 18 May 2022.</del></p>	
Recital 2				
14	(2) Multiple examples of unannounced and unjustified supply reductions and	(2) Multiple examples of unannounced and unjustified supply reductions and	(2) Multiple examples of unannounced and unjustified supply reductions and	

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	<p>interruptions already before the full-scale military invasion of Ukraine, and the weaponisation of energy by the Russian Federation since then, show that the Russian Federation systematically used existing dependencies on Russian gas supplies to harm the Union's economy. This leads to serious negative effects on Member States and the Union's economic security in general. The Russian Federation and its energy companies can therefore no longer be considered reliable energy trading partners by the Union.</p>	<p>interruptions already before the full-scale military invasion of Ukraine, and the weaponisation of energy by the Russian Federation since then, show that the Russian Federation systematically used existing dependencies on Russian gas supplies <u>as a political weapon</u> to harm the Union's economy. This leads to serious negative effects on Member States <u>single market stability, the Union's consumers, and the Union's economic security and competitiveness</u> in general. The Russian Federation and its energy companies can therefore no longer be considered reliable energy trading partners by the Union.</p>	<p>interruptions already before the full-scale military invasion of Ukraine, <del>and as well as the</del> weaponisation of energy by the Russian Federation since then, <del>show</del><b>demonstrate</b> that the Russian Federation <del>has</del> systematically <del>used</del><b>exploited</b> existing dependencies on Russian gas supplies to harm the Union's economy. This <del>leads</del><b>has led</b> to serious negative effects on Member States and the Union's economic security in general. The Russian Federation and its energy companies can therefore no longer be considered reliable energy trading partners by the Union.</p>	
Recital 3				
15	<p>(3) In January 2006, Russia stopped its natural gas supplies to Bulgaria and other countries in South East Europe in the middle of a cold spell, driving up prices increases and causing or threatening harm to citizens. On 6 January 2009, Russia again fully cut off gas transiting through Ukraine, affecting 18 Member States, especially those in Central</p>	<p>(3) In January 2006, Russia stopped its natural gas supplies to Bulgaria and other countries in South East Europe in the middle of a cold spell, driving up prices increases and causing or threatening harm to citizens. On 6 January 2009, Russia again fully cut off gas transiting through Ukraine, affecting 18 Member States, especially those in Central</p>	<p>(3) In January 2006, <del>Russia</del><b>the Russian Federation</b> stopped its natural gas supplies to <del>Bulgaria and other</del><b>some</b> countries in South East <b>and Central</b> Europe in the middle of a cold spell, driving up prices <del>increases</del> and causing or threatening harm to citizens. On 6 January 2009, <del>Russia</del><b>the Russian Federation</b> again fully cut off gas transiting</p>	

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	<p>and Eastern Europe. The supply disruption led to serious disturbances of gas markets in the region and the whole of the Union. Some Member States had zero natural gas flows for nearly 14 days, forcing lasting shutdowns of heating in schools and factories, and requiring them to declare the state of emergency. In 2014, the Russian Federation invaded and illegally annexed Crimea, ceased Ukrainian gas production assets in Crimea and reduced gas supplies to several Member States which had announced to supply Ukraine with gas, leading to market disturbances and price increases and harming economic security. In the past, Russia's State-controlled monopoly exporter Gazprom has been the subject to several Commission investigations for a possible breach of the EU competition rules and has subsequently modified its conduct on the market to address the Commission's competition concerns.<sup>1</sup> Gazprom. The competition issues at stake concerned, in several cases, so-called 'territorial restrictions' in</p>	<p>and Eastern Europe. The supply disruption led to serious disturbances of gas markets in the region and the whole of the Union. Some Member States had zero natural gas flows for nearly 14 days, forcing lasting shutdowns of heating in schools and factories, and requiring them to declare the state of emergency. In 2014, the Russian Federation invaded and illegally annexed Crimea, ceased Ukrainian gas production assets in Crimea and reduced gas supplies to several Member States which had announced to supply Ukraine with gas, leading to market disturbances and price increases and harming economic security. In the past, Russia's State-controlled monopoly exporter Gazprom has been the subject to several Commission investigations for a possible breach of the EU competition rules and has subsequently modified its conduct on the market to address the Commission's competition concerns.<sup>1</sup> <del>Gazprom.</del> The competition issues at stake concerned, in several cases, so-called 'territorial restrictions' in</p>	<p>through Ukraine, affecting 18 Member States, especially in particular those in Central and Eastern Europe. <del>The</del> <b>This</b> supply disruption led to serious disturbances of gas markets in the region and in the whole of the Union. Some Member States had zero natural gas flows for nearly 14 days, forcing lasting shutdowns of heating in schools and factories, and requiring them to declare the state of emergency. In 2014, the Russian Federation invaded and illegally annexed Crimea, <del>ceased</del> <b>seized</b> Ukrainian gas production assets in Crimea and reduced gas supplies to several Member States which had announced <del>to</del> <b>that they would</b> supply Ukraine with gas, <del>leading</del> <b>which led</b> to market disturbances and price increases and <del>harming</del> <b>harmed</b> economic security. In the past, <del>Russia</del> <b>the Russian Federation</b>'s State-controlled monopoly exporter Gazprom has been the subject <del>to</del> <b>of</b> several Commission investigations for a possible breach of <del>the</del> <b>EU</b> competition rules and has subsequently</p>	

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	<p>Gazprom’s gas supply contracts, prohibiting the resale of gas outside the own country<sup>2</sup>, as well as evidence that Gazprom was engaged in unfair pricing practices and made energy supplies dependent on political concessions from participation in Russian pipeline projects or acquiring control over Union energy assets.</p> <p>1. see Commission Decision C(2018) 3106 final of 24 May 2018 relating to a proceeding under Article 102 of the Treaty on the Functioning of the European Union (TFEU) and Article 54 of the EEA Agreement, Case AT.39816 – Upstream Gas Supplies in Central and Eastern Europe;  <a href="https://ec.europa.eu/competition/antitrust/cases/dec_docs/39816/39816_10148_3.pdf">https://ec.europa.eu/competition/antitrust/cases/dec_docs/39816/39816_10148_3.pdf</a>.</p> <p>2. See for the competition investigations concerning territorial restrictions between 2003 and 2005  <a href="http://ec.europa.eu/commission/presscorner/detail/en/ip_05_710">see:ec.europa.eu/commission/presscorner/detail/en/ip_05_710</a>;  <a href="http://ec.europa.eu/commission/presscorner/detail/en/ip_03_1345">ec.europa.eu/commission/presscorner/detail/en/ip_03_1345</a>;  <a href="http://ec.europa.eu/commission/presscorner/detail/en/ip_05_195">ec.europa.eu/commission/presscorner/detail/en/ip_05_195</a>; for the investigation in the Gazprom II case, see Commission Decision C(2018) 3106 final of 24 May 2018 relating to a proceeding under Article 102 of the Treaty on the Functioning of the European Union (TFEU) and Article 54 of the EEA Agreement, Case AT.39816 – Upstream</p>	<p>Gazprom’s gas supply contracts, prohibiting the resale of gas outside the own country<sup>2</sup>, as well as evidence that Gazprom was engaged in unfair pricing practices and made energy supplies dependent on political concessions from participation in Russian pipeline projects or acquiring control over Union energy assets.</p> <p>1. see Commission Decision C(2018) 3106 final of 24 May 2018 relating to a proceeding under Article 102 of the Treaty on the Functioning of the European Union (TFEU) and Article 54 of the EEA Agreement, Case AT.39816 – Upstream Gas Supplies in Central and Eastern Europe;  <a href="https://ec.europa.eu/competition/antitrust/cases/dec_docs/39816/39816_10148_3.pdf">https://ec.europa.eu/competition/antitrust/cases/dec_docs/39816/39816_10148_3.pdf</a>.</p> <p>2. See for the competition investigations concerning territorial restrictions between 2003 and 2005  <a href="http://ec.europa.eu/commission/presscorner/detail/en/ip_05_710">see:ec.europa.eu/commission/presscorner/detail/en/ip_05_710</a>;  <a href="http://ec.europa.eu/commission/presscorner/detail/en/ip_03_1345">ec.europa.eu/commission/presscorner/detail/en/ip_03_1345</a>;  <a href="http://ec.europa.eu/commission/presscorner/detail/en/ip_05_195">ec.europa.eu/commission/presscorner/detail/en/ip_05_195</a>; for the investigation in the Gazprom II case, see Commission Decision C(2018) 3106 final of 24 May 2018 relating to a proceeding under Article 102 of the Treaty on the Functioning of the European Union (TFEU) and Article 54 of the EEA Agreement, Case AT.39816 – Upstream</p>	<p><del>modified</del><b>changed</b> its conduct on the market <b>in order</b> to address the Commission’s competition concerns.<sup>1</sup><del>Gazprom. In several cases, the competition issues at stake concerned, in several cases, so-called ‘territorial restrictions’ in Gazprom’s gas supply contracts, prohibiting the resale of gas outside the own destination</del> country<sup>2</sup>, as well as evidence that Gazprom was engaged in unfair pricing practices and made energy supplies dependent on political concessions from participation in Russian pipeline projects or acquiring control over Union energy assets.</p> <p>1. see Commission Decision C(2018) 3106 final of 24 May 2018 relating to a proceeding under Article 102 of the Treaty on the Functioning of the European Union (TFEU) and Article 54 of the EEA Agreement, Case AT.39816 – Upstream Gas Supplies in Central and Eastern Europe;  <a href="https://ec.europa.eu/competition/antitrust/cases/dec_docs/39816/39816_10148_3.pdf">https://ec.europa.eu/competition/antitrust/cases/dec_docs/39816/39816_10148_3.pdf</a>.</p> <p>2. See for the competition investigations concerning territorial restrictions between 2003 and 2005  <a href="http://ec.europa.eu/commission/presscorner/detail/en/ip_05_710">see:ec.europa.eu/commission/presscorner/detail/en/ip_05_710</a>;  <a href="http://ec.europa.eu/commission/presscorner/detail/en/ip_03_1345">ec.europa.eu/commission/presscorner/detail/en/ip_03_1345</a>;</p>	

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	Gas Supplies in Central and Eastern Europe.	Gas Supplies in Central and Eastern Europe.	<a href="https://ec.europa.eu/commission/presscorner/detail/en/ip_03_1345">il/en/ip_03_1345</a> ; <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip_05_195">ec.europa.eu/commission/presscorner/detail/en/ip_05_195</a> ; for the investigation in the Gazprom II case, see Commission Decision C(2018) 3106 final of 24 May 2018 relating to a proceeding under Article 102 of the Treaty on the Functioning of the European Union (TFEU) and Article 54 of the EEA Agreement, Case AT.39816 – Upstream Gas Supplies in Central and Eastern Europe.	
Recital 4				
16	(4) Russia’s unprovoked and unjustified war against Ukraine since February 2022 and subsequent weaponised reductions of gas supplies in conjunction with the manipulation of the markets through intentional disruptions of gas flows have laid bare vulnerabilities and dependencies in the Union and its Member States, with the clear potential of a direct and serious impact on the functioning of the Union gas market, the Union’s economy and its essential security interests, as well as direct harm to Union citizens because energy supply disruptions can harm citizens’ health or life. Evidence shows that the State-controlled company Gazprom intentionally	(4) Russia’s unprovoked and unjustified war against Ukraine since February 2022 and subsequent weaponised reductions of gas supplies in conjunction with the manipulation of the markets through intentional disruptions of gas flows have laid bare vulnerabilities and dependencies in the Union and its Member States, with the clear potential of a direct and serious impact on the functioning of the Union gas market, the Union’s economy and its essential security interests, as well as direct harm to Union citizens because energy supply disruptions can harm citizens’ health or life. Evidence shows that the State-controlled company Gazprom intentionally	(4) <del>Russia</del> <b>The Russian Federation</b> ’s unprovoked and unjustified war against Ukraine since February 2022 and subsequent weaponised reductions of gas supplies in conjunction with the manipulation of the markets through intentional disruptions of gas flows have laid bare vulnerabilities and dependencies in the Union and its Member States, with the clear potential of a direct and serious impact on the functioning of the Union gas market, the Union’s economy and its essential security interests, as well as <b>of</b> direct harm to Union citizens because energy supply disruptions can harm citizens’ health or life. Evidence shows that the State-controlled company	

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	<p>manipulated the Union’s energy markets in order to drive up energy prices. Large underground storages in the Union controlled by Gazprom were left at an unprecedented low level, and Russian companies reduced sales at Union gas hubs<sup>1</sup> and fully discontinued the use of their own sales platform before the invasion, affecting short-term markets and aggravating the already tight supply situation after Russia’s unlawful invasion of Ukraine. As of March 2022, Russia systematically halted or reduced deliveries of natural gas to Member States, leading to significant disturbances on the Union gas market. This affected notably the supplies to the Union via the Yamal pipeline, the supplies to Finland as well as the Nord Stream 1 pipeline, where Gazprom first reduced flows and eventually shut supplies via the pipeline entirely.</p> <p><small>1. ACER “European gas market trends and price drivers 2023 - Market Monitoring Report” (para. 28).</small></p>	<p>manipulated the Union’s energy markets in order to drive up energy prices. Large underground storages in the Union controlled by Gazprom were left at an <del>unprecedented</del><b>unprecedentedly</b> low level, and Russian companies reduced sales at Union gas hubs<sup>1</sup> and fully discontinued the use of their own sales platform before the invasion, affecting short-term markets and aggravating the already tight supply situation after Russia’s unlawful invasion of Ukraine. As of March 2022, Russia systematically halted or reduced deliveries of natural gas to Member States, leading to significant disturbances on the Union gas market. This affected notably the supplies to the Union via the Yamal pipeline, the supplies to Finland as well as the Nord Stream 1 pipeline, where Gazprom first reduced flows and eventually shut supplies via the pipeline entirely.</p> <p><small>1. ACER “European gas market trends and price drivers 2023 - Market Monitoring Report” (para. 28).</small></p>	<p>Gazprom intentionally manipulated the Union’s energy markets in order to drive up energy prices. Large underground storages in the Union controlled by Gazprom were left at an <del>unprecedented low level</del><b>unprecedentedly low levels</b>, and Russian companies reduced sales at Union gas hubs<sup>1</sup> and fully discontinued the use of their own sales platform before the invasion, <del>affecting</del><b>which affected</b> short-term markets and <del>aggravating</del><b>aggravated</b> the already tight supply situation after <del>Russia</del><b>the Russian Federation’s</b> unlawful invasion of Ukraine. As of March 2022, <del>Russia</del><b>the Russian Federation</b> systematically halted or reduced deliveries of natural gas to Member States, leading to significant disturbances on the Union gas market. This affected <del>notably their</del><b>particular</b> supplies to the Union via the Yamal pipeline, <del>the</del> supplies to Finland as well as the Nord Stream 1 pipeline, where Gazprom first reduced flows and eventually shut</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			<p><b>down</b> supplies via the pipeline entirely.</p> <p>1. ACER “European gas market trends and price drivers 2023 – Market Monitoring Report” (para. 28).</p>	
Recital 5				
17	<p>(5) Russia’s weaponisation of gas supply and market manipulation through intentional disruptions of gas flows led to skyrocketing energy prices in the Union, reaching unprecedented levels, up to eight times above the average of previous years, in 2022. The resulting need to find alternative gas supply sources, to change supply routes, to fill storages for the winter, and to find solutions for congestion problems in the Union’s gas infrastructure contributed to high price volatility and the unprecedented price hikes in 2022.</p>	<p>(5) Russia’s weaponisation of gas supply and market manipulation through intentional disruptions of gas flows led to skyrocketing energy prices in the Union, reaching unprecedented levels, up to eight times above the average of previous years, in 2022. The resulting need to find alternative gas supply sources, to change supply routes, to fill storages for the winter, and to find solutions for congestion problems in the Union’s gas infrastructure contributed to high price volatility and the unprecedented price hikes in 2022.</p>	<p>(5) <del>Russia</del><b>The Russian Federation</b>’s weaponisation of gas supply and market manipulation through intentional disruptions of gas flows led to skyrocketing energy prices in the Union, reaching unprecedented levels, up to eight times <del>above</del> the average of previous years, in 2022. The resulting need to find alternative gas supply sources, to change supply routes, to fill storages for the winter, and to find solutions for congestion problems in the Union’s gas infrastructure contributed to high price volatility and the unprecedented price hikes in 2022.</p>	
Recital 6				
18	<p>(6) The exceptionally high gas prices translated into high electricity prices and price increases for other energy products, leading to sustained high</p>	<p>(6) The exceptionally high gas prices translated into high electricity prices and price increases for other energy products, leading to sustained high</p>	<p>(6) The exceptionally high gas prices translated into high electricity prices and price increases for other energy products, leading to sustained high</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>inflation. A deep economic crisis with negative growth rates in many Member States, caused by the high energy prices, endangered the economy of the Union, undermined consumer purchasing power and raised the cost of manufacturing, particularly in energy, leading to risks for social cohesion and stability, and even to human life or health. The supply interruptions also led to very seriously problems for the security of energy supply in the Union and forced eleven Member States to declare an energy crisis level under Regulation (EU) 2017/1938 of the European Parliament and of the Council<sup>1</sup>. Benefitting from the Union’s dependency during that crisis, Russia’s manipulations of the market allowed it to achieve record-high profits from remaining energy trade with Europe, with revenues from gas imports accounting still for EUR 15bn in 2024. Those revenues could be used to finance further economic attacks against the Union, undermining economic security. They could also be used to finance the war of aggression against the</p>	<p>inflation. A deep economic crisis with negative growth rates in many Member States, caused by the high energy prices <u>and volatility</u>, endangered the economy of the Union, undermined consumer purchasing power and raised the cost of manufacturing, particularly in energy, leading to risks for social cohesion and stability, and even to human life or health. The supply interruptions also led to very seriously problems for the security of energy supply in the Union and forced eleven Member States to declare an energy crisis level under Regulation (EU) 2017/1938 of the European Parliament and of the Council<sup>1</sup>. Benefitting from the Union’s dependency during that crisis, Russia’s manipulations of the market allowed it to achieve record-high profits from remaining energy trade with Europe, with revenues from gas imports accounting still for EUR 15bn in 2024. Those revenues could be used to finance further economic attacks against the Union, undermining economic security. They could also be used to finance</p>	<p>inflation. A deep economic crisis with negative growth rates in many Member States, caused by the high energy prices, endangered the economy of the Union, undermined consumer purchasing power and raised the cost of manufacturing, <del>particularly in energy,</del> leading to risks <del>for</del> social cohesion and stability, and even to human life or health. The supply interruptions also led to very <del>seriously</del> <b>serious</b> problems <del>for</del> <b>concerning</b> the security of energy supply in the Union and forced <del>eleven</del> <b>11</b> Member States to declare an energy crisis level under Regulation (EU) 2017/1938 of the European Parliament and of the Council<sup>1</sup>. Benefitting from the Union’s dependency during that crisis, <del>Russia</del> <b>the Russian Federation</b>’s manipulations of the market allowed it to achieve record-high profits from <del>the</del> remaining energy trade with Europe, with revenues from gas imports <del>still</del> <b>accounting-still</b> for EUR 15bn in 2024. Those revenues could be used to finance further economic attacks against the Union, undermining economic</p>	


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	<p>Ukraine which constitutes a major threat to political and economic stability in Europe.</p> <p>1. 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 (OJ L 280, 28.10.2017, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2017/1938/oj">http://data.europa.eu/eli/reg/2017/1938/oj</a>)</p>	<p>the war of aggression against the Ukraine which constitutes a major threat to political and economic stability in Europe.</p> <p>1. 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 (OJ L 280, 28.10.2017, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2017/1938/oj">http://data.europa.eu/eli/reg/2017/1938/oj</a>)</p>	<p>security. They could also be used to finance the war of aggression against the Ukraine which constitutes a major threat to political and economic stability in Europe.</p> <p>1. 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 (OJ L 280, 28.10.2017, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2017/1938/oj">http://data.europa.eu/eli/reg/2017/1938/oj</a>).</p>	
Recital 7				
19	<p>(7) The recent crisis provided evidence that trustful trade relations with partners supplying energy products are crucial to preserve market stability, to protect human life and health as well as the essential security interests of the Union, not the least because the Union depends to a large extent on energy imports from third countries. Maintaining energy supplies from Russia would expose the Union to continued economic and security risks; it would therefore not increase but decrease its supply security. Even dependencies on</p>	<p>(7) The recent crisis provided evidence that trustful trade relations with partners supplying energy products are crucial to preserve market stability, to protect human life and health as well as the essential security interests of the Union, not the least because the Union depends to a large extent on energy imports from third countries. Maintaining energy supplies from Russia would expose the Union to continued economic and security risks; it would therefore not increase but decrease its supply security. Even dependencies on</p>	<p>(7) The recent crisis provided evidence that trustful trade relations with partners supplying energy products are crucial to <del>preserve</del><b>preserving</b> market stability, <del>to protect</del> <b>and protecting</b> human life and health as well as the essential security interests of the Union, <b>including</b> not the least because the Union depends to a large extent on energy imports from third countries. Maintaining energy supplies from <del>Russia</del><b>the Russian Federation</b> would expose the Union to continued economic and security risks; it would therefore <del>not decrease</del>,</p>	

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	<p>smaller import volumes of Russian gas can, if abused by Russia, significantly distort the price dynamic, even if just temporarily, and disrupt energy markets, especially in those regions which are still significantly reliant on imports from Russia. Taking into account the long standing and consistent pattern of market manipulations and supply disruptions, and the fact that the Russian government has consistently used gas trade as a weapon to achieve policy instead of trade goals, it is therefore appropriate to take measures to address the continued vulnerability of the Union resulting from natural gas imports both via pipelines and liquified natural gas (LNG) with the Russian Federation.</p>	<p>smaller import volumes of Russian gas can, if abused by Russia, significantly distort the price dynamic, even if just temporarily, and disrupt energy markets, especially in those regions which are still significantly reliant on imports from Russia. Taking into account the long standing and consistent pattern of market manipulations and supply disruptions, and the fact that the Russian government has consistently used gas trade as a weapon to achieve policy instead of trade goals, it is therefore appropriate to take <u>legally binding</u> measures to <del>address the continued vulnerability</del> <u>eliminate all remaining vulnerabilities</u> of the Union resulting from natural gas imports both via pipelines and liquified natural gas (LNG) with the Russian Federation.</p>	<p><del>rather than increase but decrease its supply, its security of energy supply.</del> Even dependencies on smaller import volumes of Russian gas can, if abused by Russia <del>the Russian Federation</del>, significantly distort the price dynamic, even if <del>just</del> temporarily, and disrupt energy markets, <del>especially</del> <b>in particular</b> in those regions which are still significantly reliant on imports from <del>Russia</del> <b>the Russian Federation</b>. <del>Taking into account</del> <b>In view of</b> the long standing and consistent pattern of market manipulations and supply disruptions, <del>and</del> <b>as well as of</b> the fact that the <del>Russian</del> government <b>of the Russian Federation</b> has consistently used gas trade as a weapon to achieve policy <del>instead of goals rather than</del> trade goals, it is <del>therefore</del> appropriate to take measures to address the continued vulnerability of the Union resulting from natural gas imports <b>from the Russian Federation</b>, both via pipelines and liquified natural gas (LNG) <del>with the Russian Federation</del>.</p>	
Recital 7a				

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19a		<p><u><i>(7a) In their Versailles Declaration, the Heads of Member States committed not only to phase out natural gas supplies from Russia, but also other energy supplies, notably oil supplies. Russia has a history of using oil as a means of exerting coercion and manipulation. For example, in July 2006, Russia's oil pipeline monopoly, Transneft, permanently halted deliveries, citing alleged technical reasons, to Lithuania's Mazeikiiai refinery, the largest economic entity in the country, and the only refinery in the Baltic states. This move appeared to be a response to the Polish company PKN Orlen acquiring a majority stake in the refinery, instead of Russian firms Lukoil or Rosneft. In addition, in April 2019, amidst deteriorating relations between Russia and Belarus, mounting Russian economic pressure on Ukraine, and growing tensions with several Central European countries, the chloride contamination of 5 million tonnes of Russian oil transported through the "Druzhba" pipeline caused severe</i></u></p>		




	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<p><i><u>disruption. The incident caused significant damage to the Mozyr refinery in Belarus, led to the suspension of deliveries to Poland and Ukraine, and forced the shutdown of refineries in Germany, Slovakia, Hungary, and the Czech Republic, which lasted many weeks. It is also imperative to close loopholes that allow the indirect import of Russian oil in the form of refined products, such as gasoline, via third countries. For example, certain countries have emerged as major exporters of refined oil products to the European Union, largely due to a significant increase in their imports of discounted Russian crude for processing in their refineries.</u></i></p>		
Recital 7b				
19b		<p><i><u>(7b) In order to prevent Russia from continuing to use the Union's oil imports as a tool for coercion and to cease further disruption to the internal market arising from such coercion, it is essential to complement existing measures with a permanent prohibition of oil imports from</u></i></p>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<p><i><u>the Russian Federation from 1 January 2026. These measures should also include a ban on the import of refined oil products derived from crude oil of Russian origin. While the impact on the internal market is expected to be stabilising, the impact on prices is expected to be minimal. As crude oil is traded globally, the additional seaborne supply needed to replace Druzhba pipeline volumes (about 11.4 mt/year) represents only 0.5% of global seaborne trade, an amount that is unlikely to affect prices significantly. Czechia's shift from Russian to seaborne crude in April 2025 (approx. 4.3 mt/year) had no noticeable effect on international prices. While oil imports have decreased significantly, a further phase out of Russian oil is fully feasible for countries who are still supplying Russian oil, but may require specific preparatory steps and coordination with neighbouring countries. Member States should therefore prepare national diversification plans also for oil, with a possibility for the</u></i></p>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<a href="#"><u>Commission to adopt decisions on those plans.</u></a>		
Recital 8				
20	<p>(8) The restrictions on international transactions provided for in Articles 3 and 5 of this Regulation are consistent with the Union’s external action in other areas, as required by Article 21(3) of the Treaty on European Union (TEU). The state of relations between the Union and the Russian Federation has greatly deteriorated in recent years and particularly since 2022. That deterioration of relations is due to the Russian Federation’s blatant disregard for international law and, in particular, its unprovoked and unjustified war of aggression against Ukraine. Since July 2014, the Union has progressively imposed restrictive measures on trade with the Russian Federation in response to the Russian Federation’s actions against Ukraine. The Union is allowed, by virtue of the exceptions that apply under the Agreement Establishing the World Trade Organization, and in particular Article XXI of the</p>	<p>(8) The restrictions on international transactions provided for in <del>Articles 3 and 5</del> of this Regulation are consistent with the Union’s external action in other areas, as required by Article 21(3) of the Treaty on European Union (TEU). The state of relations between the Union and the Russian Federation has greatly deteriorated in recent years and particularly since 2022. That deterioration of relations is due to the Russian Federation’s blatant disregard for international law and, in particular, its unprovoked and unjustified war of aggression against Ukraine. Since July 2014, the Union has progressively imposed restrictive measures on trade with the Russian Federation in response to the Russian Federation’s actions against Ukraine. The Union is allowed, by virtue of the exceptions that apply under the Agreement Establishing the World Trade Organization, and in particular Article XXI of the</p>	<p>(8) The restrictions on international transactions provided for in <del>Articles 3 and 5</del> <b>Article 3</b> of this Regulation are consistent with the Union’s external action in other areas, as required by Article 21(3) of the Treaty on European Union (TEU). The state of relations between the Union and the Russian Federation has greatly deteriorated in recent years and <del>particularly</del> <b>in particular</b> since 2022. That deterioration of relations is due to the Russian Federation’s blatant disregard for international law and, in particular, its unprovoked and unjustified war of aggression against Ukraine. Since July 2014, the Union has progressively imposed restrictive measures on trade with the Russian Federation in response to the Russian Federation’s actions against Ukraine. The Union is allowed, by virtue of the exceptions that apply under the Agreement Establishing the World Trade Organization, and in</p>	

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	General Agreement on Tariffs and Trade 1994 (security exceptions) and analogous exceptions under the Agreement on Partnership and Cooperation with the Russian Federation, not to accord to goods imported from the Russian Federation the advantages granted to like products imported from other countries (most-favoured-nation treatment). Therefore, the Union is not prevented from imposing prohibitions or restrictions on the import of goods of the territory of the Russian Federation, if the Union considers such measures, taken in time of the existing emergency in international relations between the Union and the Russian Federation, to be necessary for the protection of the Union's essential security interests.	General Agreement on Tariffs and Trade 1994 (security exceptions) and analogous exceptions under the Agreement on Partnership and Cooperation with the Russian Federation, not to accord to goods imported from the Russian Federation the advantages granted to like products imported from other countries (most-favoured-nation treatment). Therefore, the Union is not prevented from imposing prohibitions or restrictions on the import of goods of the territory of the Russian Federation, if the Union considers such measures, taken in time of the existing emergency in international relations between the Union and the Russian Federation, to be necessary for the protection of the Union's essential security interests.	particular Article XXI of the General Agreement on Tariffs and Trade 1994 (security exceptions) and analogous exceptions under the Agreement on Partnership and Cooperation with the Russian Federation, <del>to not to</del> accord to goods imported from the Russian Federation the advantages granted to like products imported from other countries (most-favoured-nation treatment). Therefore, the Union is not prevented from imposing prohibitions or restrictions on the import of goods <del>of the territory of</del> <del>from</del> the Russian Federation, if the Union considers such measures, taken <del>in</del> <del>at</del> the time of the <del>existing</del> <b>ongoing</b> emergency in international relations between the Union and the Russian Federation, to be necessary for the protection of the Union's essential security interests.	
Recital 8a				
20a		<u><i>(8a) In order to safeguard the Union's security of gas supply and prevent circumvention of the prohibition on the import of Russian natural gas, the scope of that prohibition should also</i></u>		Bulgaria does not support the proposed extension of the prohibition to the temporary storage of Russian-origin gas in EU storage facilities. Such a measure goes beyond the scope and

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		<p><u><i>extend to the temporary storage of Russian origin gas in the EU storage facilities located on the territory of the Union. The Union's gas storage facilities are critical security assets, covering some 30% of winter consumption across the Union. Well-filled storage facilities, along with voluntary demand reduction, have proven essential in periods of tight supply and market stress. Past instances of gas storage hoarding have further led to substantial market distortions, increased prices, and threats to critical security measures<sup>1</sup>. Allowing third-country entities to book capacity to temporarily store Russian origin gas in the Union for later withdrawal or re-export undermines the Union's objective to phase out dependency on Russian fossil fuels and uses up capacity needed for ensuring the Union's energy security. For the purposes of achieving the goals of this Regulation, temporary storage of Russian gas should therefore be prohibited.</i></u></p> <p><sup>1</sup> See Assessment of Impact, page 4.</p>		<p>objectives of the REPowerEU Regulation, which target imports into the Union rather than storage operations. It could also create unintended risks for the functioning of the internal gas market and the flexibility of the EU storage system, as well as due to the inability to trace the origin of the gas in the general mix during the injection period.</p>

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Recital 9				
21	<p>(9) Diversifying LNG import capacity is essential for strengthening and maintaining energy security within the Union. A significant portion of that capacity is controlled by Russian companies via long-term contracts of more than 10 years, creating a risk that the capacity rights reserved in those contracts could be used to obstruct imports from alternative sources through capacity hoarding practices. Similar practices could make Union energy markets subject to the prolonged influence of Russian companies, which have previously demonstrated a significant capacity to distort markets in the Union, using existing dependencies. Past instances of gas storage hoarding have further led to substantial market distortions, increased prices, and threats to critical security measures<sup>1</sup>. Given the essential role that LNG is expected to play in securing alternative energy supplies in the it is essential to complement the gas import ban with a prohibition on providing</p>	<p>(9) Diversifying LNG import capacity is essential for strengthening and maintaining energy security within the Union. A significant portion of that capacity is controlled by Russian companies via long-term contracts of more than 10 years, creating a risk that the capacity rights reserved in those contracts could be used to obstruct imports from alternative sources through capacity hoarding practices. Similar practices could make Union energy markets subject to the prolonged influence of Russian companies, which have previously demonstrated a significant capacity to distort markets in the Union, using existing dependencies. <i>Past instances of gas storage hoarding have further led to substantial market distortions, increased prices, and threats to critical security measures<sup>1</sup>.</i> Given the essential role that LNG is expected to play in securing alternative energy supplies <i>in the</i> it is essential to complement the gas import ban with a prohibition on providing</p>	<p>(9) Diversifying <del>the</del> LNG import <del>capacity</del> is essential for strengthening and maintaining energy security within the Union. <del>A significant portion of that</del> <b>To avoid any risk that long-term reservations of LNG terminal capacity is <del>controlled</del> held</b> by Russian companies <del>via long-term contracts of more than 10 years, creating a risk that the capacity rights reserved in those contracts could be used to obstruct imports from alternative sources through capacity hoarding practices.</del> Similar practices could make Union, <b>national regulators and competition authorities are to make full use of the robust legal instruments which are available under national and European</b> energy markets subject to the prolonged influence of Russian companies, which have previously demonstrated a significant capacity to distort markets in the Union, using existing dependencies. Past instances of gas storage hoarding have further led to substantial market distortions, increased prices, and</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>LNG terminal services to Russian entities. To assist Member States in ending their dependency on Russian gas supplies, and to ensure the effective delivery of LNG imports from alternative sources, it is important to avoid that the necessary import infrastructure can be blocked by Russian customers of LNG terminal services. The provision of long-term LNG terminal services to entities from Russia or controlled by Russian should be therefore prohibited as of 1 January 2026. Those provided under a contract concluded before 17 June 2025, should be prohibited as of 1 January 2028. This should enable the reallocation of terminal capacity to alternative LNG suppliers and strengthen the resilience of the energy market in the Union.</p> <p>1. See Assessment of Impact, page 4.</p>	<p>LNG terminal services to Russian entities. To assist Member States in ending their dependency on Russian gas supplies, and to ensure the effective delivery of LNG imports from alternative sources, it is important to <del>avoid that the necessary import infrastructure can be blocked</del> <b>by prevent</b> Russian customers of LNG terminal services <b>from blocking the necessary import infrastructure</b>. The provision of long-term LNG terminal services to entities from Russia or <b>to entities owned or controlled, directly or indirectly via various frameworks, such as intermediate structures or subsidiaries, by Russian Federation, or under significant influence from the Russian Federation</b> should be therefore prohibited as of 1 January 2026. Those provided under a contract concluded before 17 June 2025, should be prohibited as of 1 January <del>2028</del><b>2027</b>. This should enable the reallocation of terminal capacity to alternative LNG suppliers and strengthen the resilience of the energy market in the Union.</p>	<p><del>threats to critical security measures<sup>1</sup> and competition law where appropriate. Given the essential role that LNG is expected to play in securing alternative energy supplies in the it is essential to complement the gas import ban with a prohibition on providing LNG terminal services to Russian entities. To assist Member States in ending their dependency on Russian gas supplies, and to ensure the effective delivery of LNG imports from alternative sources, it is important to avoid that the necessary import infrastructure can be blocked by Russian customers of LNG terminal services. The provision of long-term LNG terminal services to entities from Russia or controlled by Russian should be therefore prohibited as of 1 January 2026. Those provided under a contract concluded before 17 June 2025, should be prohibited as of 1 January 2028. This should enable the reallocation of terminal capacity to alternative LNG suppliers and strengthen the</del></p>	

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		<i>1. See Assessment of Impact, page 4.</i>	resilience of the energy market in the Union.  <i>1. See Assessment of Impact, page 4.</i>	
Recital 10				
22	(10) The Commission has carefully assessed the impact on the Union and on its Member States of a possible prohibition of Russian imports of natural gas and of the provision of LNG terminal services to Russian entities. In fact, preparatory work and several detailed analyses of the consequences of a total phase out of Russian gas have been conducted and published since 2022 <sup>1</sup> , and the Commission could also draw upon a multitude of consultations with stakeholders, external experts and agencies, and studies on the effects of the phase out of Russian gas. The Commission's analysis showed that a phase out of Russian natural gas imports, if introduced in a stepwise, coordinated and well-prepared manner in a spirit of solidarity, is likely to have limited impact on energy prices in the Union, and that it will enhance and not endanger the Union's security	(10) The Commission has carefully assessed the impact on the Union and on its Member States of a possible prohibition of Russian imports of natural gas and of the provision of LNG terminal services to Russian entities. In fact, preparatory work and several detailed analyses of the consequences of a total phase out of Russian gas have been conducted and published since 2022 <sup>1</sup> , and the Commission could also draw upon a multitude of consultations with stakeholders, external experts and agencies, and studies on the effects of the phase out of Russian gas. The Commission's analysis showed that a phase out of Russian natural gas imports, if introduced in a stepwise, coordinated and well-prepared manner in a spirit of solidarity, is likely to have limited impact on energy prices in the Union, and that it will enhance and not endanger the Union's security	(10) The Commission has carefully assessed the impact on the Union and on its Member States of a possible prohibition of <del>Russian</del> imports of <b>Russian</b> natural gas <del>and of the provision of LNG terminal services to Russian entities</del> . In fact, preparatory work and several detailed analyses of the consequences of a total <del>phase out</del> <b>phase-out</b> of Russian gas have been conducted and published since 2022 <sup>+</sup> , and the Commission could also draw upon a multitude of consultations with stakeholders, external experts and agencies, and studies on the effects of the <del>phase out</del> <b>phase-out</b> of Russian gas. The Commission's analysis showed that a <del>phase out</del> <b>phase-out</b> of Russian natural gas imports, if introduced in a stepwise, coordinated and well-prepared manner <b>and</b> in a spirit of solidarity, is likely to have limited impact on energy prices in the Union, and that it will enhance and	Setting 1 January 2027 as the end date for Russian gas imports appears too ambitious given the current state of infrastructure and market readiness.

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	<p>of supply, due to the exit of an unreliable trading partner from the Union markets. As set out in the REPower Roadmap, the implementation of the REPowerEU Plan has already reduced supply dependencies from Russia, for instance by measures to reduce gas demand or to accelerate the deployment of renewable energy sources, as well as active support to diversification of energy supplies and the increase of the EU bargaining power via Joint gas purchasing. The Assessment of Impact also showed that upfront coordination of diversification policies can avoid harmful effects on prices or supplies<sup>2</sup>.</p> <p>1. See, for example, Commission Staff Working Document Implementing the REPower EU Action Plan: Investment Needs, Hydrogen Accelerator and Achieving the Bio-Methane Targets, SWD(2022) 230 final, accompanying the Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU Plan, COM(2022) 230 final, 18 May 2022. 2. See Assessment of Impacts, page 35.</p>	<p>of supply, due to the exit of an unreliable trading partner from the Union markets. As set out in the REPower Roadmap, the implementation of the REPowerEU Plan has already reduced supply dependencies from Russia, for instance by measures to reduce gas demand or to accelerate the deployment of renewable energy sources, as well as active support to diversification of energy supplies and the increase of the EU bargaining power via Joint gas purchasing. The Assessment of Impact also showed that upfront coordination of diversification policies can avoid harmful effects on prices or supplies<sup>2</sup>. <u>Moreover, the global LNG supply is growing rapidly, while gas demand in the Union is in steady decline. Since 2021, gas consumption in the Union has dropped by 80 bcm/y and it is now down by 17% on average, compared to the period before February 2022. As the projected reduction in consumption by 2027 is larger than the current imports from Russia, only a small part of the Russian gas imports</u></p>	<p>not endanger the Union's security of <del>the Union's</del> energy supply, due to the exit of an unreliable trading partner from the Union markets. As set out in the <del>REPower</del>REPowerEU Roadmap, the implementation of the REPowerEU Plan has already reduced <del>supply</del>the Union's dependencies <del>on supplies from the Russian Federation</del>from Russia, for instance by <b>introducing</b> measures to reduce gas demand or to accelerate the deployment of renewable energy sources, as well as <del>active support</del> <b>to by actively supporting the</b> diversification of energy supplies and the increase of the EU bargaining power <b>of the Union</b> via joint gas purchasing. The Assessment of Impact also showed that upfront coordination of diversification policies can avoid harmful effects on prices or supplies<sup>2</sup>.</p> <p>1. See, for example, Commission Staff Working Document Implementing the REPower EU Action Plan: Investment Needs, Hydrogen Accelerator and Achieving the Bio-Methane Targets, SWD(2022) 230 final, accompanying the Communication from the Commission to</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<p><u>would need to be replaced with alternative suppliers. Therefore, setting 1 January 2027 as the end date for Russian gas imports is both feasible and well-timed.</u></p> <p>1. See, for example, Commission Staff Working Document Implementing the REPower EU Action Plan: Investment Needs, Hydrogen Accelerator and Achieving the Bio-Methane Targets, SWD(2022) 230 final, accompanying the Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU Plan, COM(2022) 230 final, 18 May 2022. 2. See Assessment of Impacts, page 35.</p>	<p><del>the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, REPowerEU Plan, COM(2022) 230 final, 18 May 2022.</del> 2. <del>See Assessment of Impacts, page 35.</del></p>	
Recital 11				
23	<p>(11) The proposed Regulation is fully compatible with the Union’s strategy to reduce its reliance on fossil fuels imports by enhancing decarbonisation and rapidly expanding domestically produced clean energy. As set out in the REPower Roadmap, the implementation of the REPowerEU Plan has already resulted in substantial gas savings of more than 60 billion cubic meters annually in gas imports between 2022 and 2024, allowing</p>	<p>(11) The proposed Regulation is fully compatible with the Union’s strategy to reduce its reliance on fossil fuels imports by enhancing decarbonisation and rapidly expanding domestically produced clean energy. As set out in the REPower Roadmap, the implementation of the REPowerEU Plan has already resulted in substantial gas savings of more than 60 billion cubic meters annually in gas imports between 2022 and 2024, allowing</p>	<p>(11) The proposed Regulation is fully compatible with the Union’s strategy to reduce its reliance on fossil <del>fuels</del><b>fuel</b> imports by enhancing decarbonisation and rapidly expanding domestically produced clean energy. As set out in the <del>REPower</del><b>REPowerEU</b> Roadmap, the implementation of the REPowerEU Plan has already resulted in substantial gas savings of more than 60 billion cubic <del>meters</del><b>metres</b> annually in gas imports between 2022 and 2024,</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>the Union to reduce supply dependencies from Russia. This could be achieved by measures to reduce gas demand or to accelerate the green transition by an accelerated deployment of wind and solar generation capacity, which significantly increased the share of renewables in the energy mix, as well as by active support to diversification of energy supplies and the increase of the EU bargaining power via joint gas purchasing. Moreover, the full implementation of the energy transition, the recent Action Plan for Affordable Energy and other measures, notably investments in the production of low-carbon alternatives for energy intensive products, such as fertilisers, are expected to replace up to 100 bcm of natural gas by 2030. This will facilitate the phase out of gas imports from the Russian Federation.</p>	<p>the Union to reduce supply dependencies from Russia. This could be achieved by measures to reduce gas demand, <u>to increase energy efficiency</u> or to accelerate the green transition by an accelerated deployment of wind and solar generation capacity, which significantly increased the share of renewables in the energy mix, as well as by active support to diversification of energy supplies and the increase of the EU bargaining power via joint gas purchasing. Moreover, the full implementation of the energy transition, the recent Action Plan for Affordable Energy and other measures, notably investments in the production of low-carbon alternatives for energy intensive products, such as fertilisers, are expected to replace up to 100 bcm of natural gas by 2030. <del>This</del> <u>These combined efforts will strengthen the Union's resilience, competitiveness, and open strategic autonomy, support European industries, SMEs and citizens</u> facilitate the phase out of gas imports from the Russian Federation.</p>	<p>allowing the Union to reduce <del>supply dependencies</del> <b>on supplies from the Russian Federation.</b> <b>This reduction of dependencies</b> <del>from Russia.</del> This could be achieved by measures to reduce gas demand or to accelerate the green transition by an accelerated deployment of wind and solar generation capacity, which <b>would</b> significantly <del>increased</del> <b>increase</b> the share of renewables in the energy mix, as well as by active support to diversification of energy supplies and the increase of the <del>EU</del> <b>EU</b> bargaining power <b>of the Union</b> via joint gas purchasing. Moreover, the full implementation of the energy transition, the recent Action Plan for Affordable Energy and other measures, <del>notably in</del> <b>particular</b> investments in the production of low-carbon alternatives for energy intensive products, such as fertilisers, are expected to replace up to 100 <del>bcm</del> <b>billion cubic metres</b> of natural gas by 2030. This will facilitate the <del>phase out</del> <b>phase-out</b> of gas imports from the Russian Federation.</p>	

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
Recital 11a				
23a			<p><b>(11a) While preparing the diversification plans, the Commission should, in a coordinated manner and in spirit of solidarity, work with Member States, in particular in Central and South-Eastern Europe, to identify alternative deliveries of natural gas. In addition to improving the security of supply, new supplies could also compensate for lost revenues through utilising the existing infrastructure that has been previously used for transporting Russian gas.</b></p>	<p>We insist on the inclusion of recital 11a. We would also like to ask for adding direct applicable provisions in the main body text in accordance with the recital, clearly defining priority utilization of available infrastructure to secure the alternative replacement gas supplies (for example text could be included in Article 11 National Diversification plans.).</p>
				<p>We would also like to ask for the inclusion of the following recital:</p> <p><b><u>(11b) Without prejudice to recital 11a, a dedicated financial compensation mechanism should be introduced for affected TSOs and LNG terminal operators through EU funding instruments.</u></b></p> <p>We consider as a must reference to a dedicated compensatory mechanism for TSOs to offset</p>

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
				adverse financial impacts to be introduced in the REPowerEU Regulation. This compensatory mechanism could be implemented through EU funding instruments and by elaborating a mechanism for diversification and replacement of Russian gas in the CESEC region to overcome any potential negative impact on security and continuity of gas supply in the region. Bulgaria reiterates the importance of preserving the use of existing transmission capacity, including infrastructure previously used for Russian gas deliveries, while establishing a compensatory mechanism for TSOs to offset adverse financial impacts.
Recital 12				
24	(12) In line with the Versailles Declaration and the REPowerEU Communication, a large number of gas importers have already terminated or significantly reduced their gas supplies from Russia. As set out in the Assessment of Impacts, the remaining gas volumes under existing supply contracts can, be phased out without significant economic	(12) In line with the Versailles Declaration and the REPowerEU Communication, a large number of gas importers have already terminated or significantly reduced their gas supplies from Russia. As set out in the Assessment of Impacts, the remaining gas volumes under existing supply contracts can, be phased out without significant economic	(12) In line with the Versailles Declaration and the REPowerEU Communication, a large number of gas importers have already terminated or significantly reduced their gas supplies from <del>Russia</del> <b>Russian Federation</b> . As set out in the Assessment of Impacts, the remaining gas volumes under existing supply contracts can, be phased out without significant	

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	<p>impact or risks for security of supply, due to the availability of sufficient alternative suppliers on the gas world market, a well-interconnected Union gas market and the availability of sufficient import infrastructure<sup>1</sup>.</p> <p>1. See Assessment of Impact, pages 15 to 36.</p>	<p>impact or risks for security of supply, due to the availability of sufficient alternative suppliers on the gas world market, a well-interconnected Union gas market and the availability of sufficient import infrastructure<sup>1</sup>. <u><a href="#">The related measures need to be in line with the current energy framework of the Union.</a></u></p> <p>1. See Assessment of Impact, pages 15 to 36.</p>	<p>economic impact or risks for the security of supply, due to the availability of sufficient alternative suppliers on the gas world market, a well-interconnected Union gas market and the availability of sufficient import infrastructure<sup>1</sup>.</p> <p>1. See Assessment of Impact, pages 15 to 36.</p>	
Recital 12a				
24a			<p><b>(12a) In some cases, LNG cargoes carry LNG produced in different countries and mixed together. The prohibition should also apply to the amounts of gas in such cargoes that are produced in Russia. Where importers can unambiguously document the respective shares of LNG produced outside Russia, it should be possible to import the non-Russian LNG amounts contained in an LNG cargo.</b></p>	
Recital 13				
25	<p>(13) Short-term contracts, that is contracts on individual or</p>	<p>(13) Short-term contracts, that is contracts on individual or</p>	<p>(13) Short-term contracts, that <del>is</del> <b>supply</b> contracts on individual or</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	multiple natural gas supplies of a duration of less than one year, concern smaller volumes than the large multi-year supply contracts importers hold with Russian companies. These existing contracts will in any event be close to expiration when this Regulation will enter into force. Accordingly, the risk for economic security resulting from existing short term-contracts appears to be low. It is therefore appropriate to exempt existing short-term contracts from the immediate application of the import allowing for a transition phase until 17 June 2026.	multiple natural gas supplies of a duration of less than one year, concern smaller volumes than the large multi-year supply contracts importers hold with Russian companies. These existing contracts will in any event be close to expiration when this Regulation will enter into force. Accordingly, the risk for economic security resulting from existing short term-contracts appears to be low. It is therefore appropriate to exempt existing short-term contracts from the immediate application of the import allowing for a transition phase until 17 June 2026.	<del>multiple natural gas supplies of a duration of less than one year,</del> concern smaller volumes than the large <del>multi-year</del> <b>long-term</b> supply contracts importers hold with Russian companies. <del>These</del> <b>Those</b> existing <b>short-term supply</b> contracts will in any event be close to expiration <del>when</del> <b>by the time</b> this Regulation <del>will enter</del> <b>enters</b> into force. Accordingly, the risk <del>for</del> <b>to</b> economic security resulting from existing <del>short term-contracts</del> <b>short-term supply contracts</b> appears to be low. It is therefore appropriate to exempt existing short-term <b>supply</b> contracts from the immediate application of the import <b>prohibition</b> allowing for a transition phase until 17 June 2026.	
Recital 14				
26	(14) An exemption from the prohibition of gas imports as of 1 January 2026 should also be granted for existing long term supply contracts. Indeed, importers holding long-term contracts will usually need more time to find alternative supply routes and sources than short-term	(14) An exemption from the prohibition of gas imports as of 1 January 2026 should also be granted for existing long term supply contracts. Indeed, importers holding long-term contracts will usually need more time to find alternative supply routes and sources than short-term	(14) An exemption from the prohibition <del>of</del> <b>on</b> gas imports as of 1 January 2026 should also be granted for existing <del>long term</del> <b>long-term</b> supply contracts. <del>Indeed,</del> Importers holding long-term <b>supply</b> contracts will usually need more time to find alternative supply routes and sources than	Bulgaria does not support the proposed by the EP's amendment, as it treats EU legislation as an unforeseeable circumstance, which could undermine legal and trade certainty, as well as the principle of legitimate expectations.

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	contract holders, also as long-term contracts usually concern significantly larger volumes over time than short-term contracts. A transition time should therefore be introduced to give holders of long-term contracts sufficient time to diversify their supplies in an orderly manner.	contract holders, also as long-term contracts usually concern significantly larger volumes over time than short-term contracts. A transition time should therefore be introduced to give holders of long-term contracts sufficient time to diversify their supplies in an orderly manner. <u><i>A legal prohibition of imports of natural gas under a Union trade measure constitutes 'force majeure', a sovereign act of the Union beyond the control of gas importers, rendering the performance of natural gas imports from Russia unlawful, with direct legal effect and without any discretion for Member States concerning its application. The Commission should provide information and technical assistance to EU companies, including through best practices and training sessions, to facilitate the effective implementation of the Regulation.</i></u>	short-term contract holders, also as <del>long-term</del> <b>because long-term supply</b> contracts usually concern significantly larger volumes over time than short-term <b>supply</b> contracts. A transition time should therefore be introduced to give holders of long-term <b>supply</b> contracts sufficient time to diversify their supplies in an orderly manner.	
Recital 15				
27	(15) Some landlocked countries which are currently still	(15) <del>Some landlocked countries which are currently still supplied</del>	(15) Some landlocked countries which are currently still	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>supplied under existing long-term supply contracts for Russian pipeline gas are specifically affected by recent changes of supply routes from the Russian Federation, due to limited or no alternative routes for the transport of the contracted gas to them. To remedy the situation, suppliers from other Member States currently ensure the delivery of pipeline gas under short-term supply contracts with suppliers from the Russian Federation via uncongested interconnection points. Due to this very specific situation, the transition time necessary to find new suppliers should also apply to those short-term supply contracts with suppliers from the Russian Federation which serve to supply landlock countries affected by changes of supply routes for Russian gas.</p>	<p><del>under existing long-term supply contracts for Russian pipeline gas are specifically affected by recent changes of supply routes from the Russian Federation, due to limited or no alternative routes for the transport of the contracted gas to them. To remedy the situation, suppliers from other Member States currently ensure the delivery of pipeline gas under short-term supply contracts with suppliers from the Russian Federation via uncongested interconnection points. Due to this very specific situation, the transition time necessary to find new suppliers should also apply to those short-term supply contracts with suppliers from the Russian Federation which serve to supply landlock countries affected by changes of supply routes for Russian gas.</del> <u>deleted</u></p>	<p>supplied under existing long-term supply contracts for Russian pipeline gas are specifically affected by recent changes of supply routes from the Russian Federation, due to limited or no alternative routes for the transport of the contracted gas to them. To remedy the situation, suppliers from other Member States currently ensure the delivery of pipeline gas under short-term supply contracts with suppliers from the Russian Federation via uncongested interconnection points. Due to this very specific situation, the transition time necessary to find new suppliers should also apply to those short-term supply contracts with suppliers from the Russian Federation which serve to supply <del>landlock</del><b>landlocked</b> countries affected by changes of supply routes for Russian gas.</p>	
Recital 16				
28	<p>(16) While it appears justified to exempt existing “legacy” contracts from the immediate application, not all contracts entered into before the entry into</p>	<p>(16) While it appears justified to exempt existing “legacy” contracts from the immediate application, not all contracts entered into before the entry into</p>	<p>(16) While it appears justified to exempt existing “legacy” contracts from the immediate application <b>of the prohibition on imports of Russian gas</b>, not all</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>force of this Regulation should benefit from such exemption. Indeed, there may be an incentive by Russian suppliers to use the time between the publication of this proposal until the entry into force of the ban to increase current supplies, by concluding new contracts, increasing volumes by changing existing contracts or using flexibilities under existing contracts. In order to ensure that imports from Russia do not increase but decrease as a result of the proposed Regulation, measures should be included in the Regulation to avoid a “rush” for new Russian gas imports in the time between the adoption of this proposal and the entry into force of the ban. Indeed, the commitment from Heads of State to phase out gas supplies was already made in March 2022; it was renewed in the REPowerEU Strategy, the REPowerEU Plan and the REPowerEU Roadmap. At the latest with the publication of the proposal for this Regulation, it is no longer appropriate consider contracts concluded after that date as “legacy” contracts. Contracts</p>	<p>force of this Regulation should benefit from such exemption. Indeed, there may be an incentive by Russian suppliers to use the time between the publication of this proposal until the entry into force of the ban to increase current supplies, by concluding new contracts, increasing volumes by changing existing contracts or using flexibilities under existing contracts. In order to ensure that imports from Russia do not increase but decrease as a result of the proposed Regulation, measures should be included in the Regulation to avoid a “rush” for new Russian gas imports in the time between the adoption of this proposal and the entry into force of the ban. Indeed, the commitment from Heads of State to phase out gas supplies was already made in March 2022; it was renewed in the REPowerEU Strategy, the REPowerEU Plan and the REPowerEU Roadmap. At the latest with the publication of the proposal for this Regulation, it is no longer appropriate consider contracts concluded after that date as “legacy” contracts. Contracts</p>	<p>contracts entered into <del>before the entry into force of this Regulation should benefit from such an exemption.</del> Indeed, there may be an incentive <del>by</del>for Russian suppliers to use the time between the publication of <del>this</del><b>the Commission proposal until of this Regulation and</b> the entry into force of the <del>ban</del><b>prohibition to</b> increase current supplies, by concluding new contracts, increasing volumes by changing existing contracts or using flexibilities under existing contracts. In order to ensure that imports from <del>Russia do not increase but</del><b>the Russian Federation decrease, rather than increase, as a result of the proposed this Regulation, measures should be included in the this Regulation to should avoid a “rush” for incentives for companies to conclude new Russian gas imports import contracts in the time between the adoption of this publication of the Commission proposal of this Regulation and the entry into force of the ban prohibition.</b> Indeed, the commitment from</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	concluded after 17 June 2025 should therefore not benefit from the exceptional transition provisions for existing short and long-term contracts.	concluded after 17 June 2025 should therefore not benefit from the exceptional transition provisions for existing short and long-term contracts.	Heads of State or Government to phase out <b>Russian</b> gas supplies was already made in March 2022; <del>it was renewed in the Commission</del> <b>built on this commitment by proposing</b> the REPowerEU Strategy, the REPowerEU Plan and the REPowerEU Roadmap. At the latest with the publication of the proposal for this Regulation, it <del>is</del> <b>was</b> no longer appropriate to consider contracts concluded after that date as “legacy” contracts. Contracts concluded after 17 June 2025 should therefore not benefit from the exceptional transition provisions for existing <del>short</del> <b>short-term</b> and long-term <b>supply</b> contracts.	
Recital 17				
29	(17) In order to avoid that import volumes provided for in existing supply contracts are increased and not decreased, amendments to existing supply contracts should be considered as new contracts for the purposes of this Regulation, and increases of import volumes by using contractual flexibilities should not benefit from the transition period.	(17) In order to avoid that import volumes provided for in existing supply contracts are increased and not decreased, amendments to existing supply contracts should be considered as new contracts for the purposes of this Regulation, and increases of import volumes by using contractual flexibilities should not benefit from the transition period.	(17) In order to avoid <del>that</del> import volumes provided for in existing supply contracts <del>are</del> <b>from being increased and not decreased</b> , amendments to existing supply contracts should be considered <del>as</del> new contracts for the purposes of this Regulation, and increases of import volumes by using contractual flexibilities should not benefit from the transition period.	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			Exceptions should be provided for certain cases of necessary amendments to existing contracts, provided they do not increase contracted quantities or the timing of delivery. Price variations resulting from price indexation already provided for in existing supply contracts do not constitute an amendment to existing supply contracts.	
Recital 18				
30	(18) This Regulation creates a clear legal prohibition to import Russian natural gas, constituting a sovereign act of the Union beyond the control of gas importers and rendering the performance of natural gas imports from Russia unlawful, with direct legal effect and without any discretion for Member States concerning its application.	(18) This Regulation creates a clear legal prohibition to import <u>and temporarily store</u> Russian natural gas <u>and oil, including petroleum products</u> , constituting a sovereign act of the Union beyond the control of <del>gas</del> <u>respective</u> importers and rendering the performance of natural gas <u>and oil, including petroleum products</u> , imports from Russia <u>and the temporary storage</u> unlawful, with direct legal effect and without any discretion for Member States concerning its application.	(18) This Regulation creates a clear legal prohibition <del>to import</del> <u>on importing</u> Russian natural gas, constituting a sovereign act of the Union beyond the control of gas importers and rendering the performance of natural gas imports from <del>Russia</del> <u>the Russian Federation</u> unlawful, with direct legal effect and without any discretion for Member States concerning its application.	Bulgaria does not support the proposed extension of the scope and objectives of the REPowerEU Regulation. It could create unintended risks for the functioning of the internal market.
Recital 19				
31	(19) Unlike other goods, natural gas is a homogeneous	(19) Unlike other goods, natural gas is a homogeneous	(19) Unlike other goods, natural gas is a homogeneous	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>commodity which is traded in large volumes and often resold multiple times between traders at wholesale level. Taking into account the particular complexity of tracing the origin of natural gas, and bearing in mind that Russian suppliers might seek to circumvent this Regulation, for example by sales via intermediaries, via transshipments or transport through other countries, this Regulation should provide for an effective framework to establish the actual origin and the point of export of natural gas imported into the Union.</p>	<p>commodity which is traded in large volumes and often resold multiple times between traders at wholesale level. Taking into account the particular complexity of tracing the <del>origin</del><u>country of production</u> of natural gas, and bearing in mind that Russian suppliers might seek to circumvent this Regulation, for example by sales via intermediaries, via transshipments or transport through other countries, this Regulation should provide for an effective framework to establish the actual origin and the point of export of natural gas imported into the Union.</p>	<p>commodity which is traded in large volumes and often resold multiple times between traders at wholesale level. Taking into account the particular complexity of tracing the origin of natural gas, and bearing in mind that Russian suppliers might seek to circumvent this Regulation, for example by sales via intermediaries, via transshipments or <del>via</del> transport through other countries, this Regulation should provide for an effective framework to <del>establish the actual origin</del><b>avoid circumvention of the prohibition. Relevant authorities should therefore be enabled to take the necessary actions to identify whether natural gas supplies from the Russian Federation are brought into the Union customs territory through schemes created for circumventing the rules of this Regulation. When determining whether natural gas is released for free circulation in the Union, customs authorities should not only depend on information provided in the customs declaration, but be allowed, on</b></p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			the basis of other available information, to assess, where they deem relevant, whether a good brought into the Union is actually meant to be released into free circulation. The Regulation should also require the establishment of the country of production and the point of export supply chain of natural gas imported into the Union.	
Recital 20				
32	(20) In particular, importers of natural gas should be obliged to provide customs authorities with all information necessary to establish the origin and the point of export of natural gas imported into the Union and to decide whether the imported gas falls under the general prohibition or one of its exceptions. As the contractual conditions determining the elements relevant for the assessment of the customs authorities are often complex, customs authorities should be given the power to ask importers for detailed contract information, including entire supply contracts, excluding price information,	(20) In particular, importers of natural gas, <u>and/or natural gas undertakings planning to temporarily store</u> , should be obliged to provide customs authorities with all information necessary to establish the <del>origin</del> <u>country of production</u> and the point of export of natural gas imported into the Union and to decide whether the imported gas falls under the general prohibition or one of its exceptions. <u>The concept of country of production allows customs authorities to determine the origin of the imported gas which remains the country of extraction even if the natural gas is liquified or</u>	(20) In particular, importers of natural gas should be obliged to provide customs authorities with all information necessary to establish the <del>origin and the point of export</del> <u>country of production</u> of natural gas imported into the Union and to <del>decide</del> <u>determine</u> whether the imported gas falls <del>under</del> <u>is subject to</u> the general prohibition or one of its exceptions. <del>As the contractual conditions determining the elements relevant</del> <u>The concept of ‘origin’ under Union customs law may not always allow for the assessment</u> <u>identification</u> of the customs authorities are often complex, customs authorities	We do not support a more limited exemption criterion from prior authorisation for non-Russian gas.

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>where this is necessary to understand the context of certain clauses or references to other contractual provisions. The Regulation should include rules to ensure an effective protection of business secrets of concerned undertakings.</p>	<p><u><i>regasified in another country.</i></u> As the contractual conditions determining the elements relevant for the assessment of the customs authorities are often complex, customs authorities should be given the power to ask importers for detailed contract information, including entire supply contracts, excluding price information, where this is necessary to understand the context of certain clauses or references to other contractual provisions. <u><i>However, the level of information required should depend on the origin of the natural gas and be based on the risk of circumvention. For gas originating in or exported directly or indirectly from the Russian Federation, a prior authorisation from customs authorities should be required and to this end, importers should submit detailed evidence, such as evidence related to delivery points, quantities, information on liquefaction and loading ports. For gas originating in countries other than the Russian Federation, importers should provide evidence to establish the</i></u></p>	<p><del>should be given the power to ask importers for detailed contract information, including entire supply contracts, excluding price information, where this is necessary to understand the context of certain clauses or references to other contractual provisions</del>  <b>country of production of the imported gas, for example when the gas was processed (e.g. liquified or regasified) after leaving the Russian Federation.</b>  The Regulation should include rules to ensure an effective protection of business secrets of concerned undertakings <del>therefore</del> also cover cases where the country of ‘origin’ under Union custom law differs from the country of production of the gas and provide for a mechanism to verify whether the natural gas was extracted or liquified in the Russian Federation. Any gas which, before its import into the EU, was exported from the Russian Federation, either via direct export from Russia to the EU or via indirect export through a third country, should,</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<p><u>country of production. The Commission should determine the minimum standards for such evidence, including the type, format and authentication requirements, in order to ensure uniform application across Member States. No prior authorisation or evidence should be required for imports from countries prohibiting Russian gas imports, in a manner equivalent to the obligations laid down in this Regulation, and the Commission should establish a list of such countries.</u> The Regulation should include rules to ensure an effective protection of business secrets of concerned undertakings.</p>	<p>except in case of transit, be subject to the prohibition.</p>	
Recital 20a				
32a			<p><b>(20a) Due to the specific characteristics of pipeline gas and LNG, and in order to allow for a smooth verification process of the country of production and the conditions for possible exemptions before the gas enters the Union customs territory, a prior authorisation process should be introduced. Imports</b></p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			<p>should be refused in the absence of an authorisation. Authorising authorities should be informed in advance about intended imports into the Union, and the information should be submitted to them which is necessary to verify the country of production or whether the conditions for an exemption under this Regulation are met. While authorising authorities should strive to issue an authorisation within the period between submission of information by the importer and the planned entry into the customs territory in order to facilitate imports of gas to the EU, they may also decide at a later stage, in particular, in case there are doubts concerning the information provided. The prior authorisation is without prejudice to existing enforcement powers of customs authorities. Imports of natural gas from gas producing countries should be exempted from that obligation if the Union has imported significant volumes from these countries in the past and if these countries</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			<p>either have shown that they do not want to support the Russian gas sector by a prohibition of the import of Russian gas, restrictive measures targeting Russian gas infrastructure, Russian gas companies or persons managing such companies, or if these countries do not dispose of the necessary infrastructure to import natural gas via pipelines or LNG. The Commission should establish the list of such countries.</p>	
Recital 20a				
32b		<p><i><u>(20a) Importers of oil, including petroleum products, should be required to submit to the customs authorities an application for prior authorisation of imports accompanied by all information necessary to establish the country of origin of the imported crude oil, the country of origin of the imported petroleum product or the country of origin of crude oil on the basis of which the petroleum product was obtained. The Commission should determine the minimum</u></i></p>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<p><u>standards for such evidence, including the type, format and authentication requirements, in order to ensure uniform application across Member States. The Regulation should also establish obligations for oil pipeline operators, regarding the verification of origin. A requirement to verify and certify the origin of oil at the point of entry will provide an essential safeguard against the unauthorised import of restricted commodities and will complement existing import controls.</u></p>		
Recital 20b				
32c			<p><b>(20b) Authorising authorities and, where they are not identical, customs authorities should be able to request all information necessary to assess the legality of imports. They should also be able to rely on information from other sources. As the contractual conditions determining the elements relevant for the assessment are often complex, the authorities should be empowered to ask importers for detailed contract</b></p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			information, including entire supply contracts, excluding price information, where that is necessary to understand the context of certain clauses or references to other contractual provisions. This Regulation should include rules to ensure an effective protection of business secrets of concerned undertakings.	
Recital 20b				
32d		<i><u>(20b) In order to establish the minimum standards for evidence which importers need to present to customs authorities to prove the origin of natural gas, oil and petroleum products, implementing powers should be conferred on the Commission. The Commission should adopt immediately applicable implementing acts where, in duly justified cases relating to the significant risks for trade and security stemming from possible circumvention of this Regulation, imperative grounds of urgency so require. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of</u></i>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VSEEC Council Mandate	VS.EC Draft Agreement
		<u><a href="#">the European Parliament and of the Council.</a></u>		
Recital 21				
33	<p>(21) Customs authorities should cooperate with regulatory authorities, competent authorities, the Agency for the Cooperation of Energy Regulators (ACER) and the Commission to implement the provisions of this Regulation and exchange relevant information, notably when it comes to the assessment of exemptions allowing imports of Russian natural gas after 1.1.2026. Customs authorities, regulatory authorities, competent authorities and ACER should have the necessary tools and databases in place to ensure that relevant information can be exchanged between national authorities and authorities in different Member States where necessary. ACER should contribute with its expertise to the process of monitoring the implementation. To facilitate the creation of the necessary interoperable joint information systems, the Commission and Member States may explore</p>	<p>(21) Customs authorities should cooperate with regulatory authorities, competent authorities, the Agency for the Cooperation of Energy Regulators (ACER), <u><a href="#">the European Anti-Fraud Office (OLAF), the European Public Prosecutor's Office (EPPO)</a></u> and the Commission to implement the provisions of this Regulation and exchange relevant information, notably when it comes to the assessment of exemptions allowing imports of Russian natural gas after 1.1.2026. Customs authorities, regulatory authorities, competent authorities and ACER should have the necessary tools and databases in place to ensure that relevant information can be exchanged between national authorities and authorities in different Member States where necessary. <u><a href="#">Customs authorities and relevant authorities should access, use and exchange the relevant information gathered pursuant to</a></u></p>	<p>(21) Customs authorities should cooperate with regulatory authorities, competent authorities, the Agency for the Cooperation of Energy Regulators (ACER) and the Commission to implement the provisions of this Regulation and exchange relevant information, notably when it comes to the assessment of exemptions allowing imports of Russian natural gas after 1.1.2026. Customs authorities, regulatory authorities, competent authorities and ACER should have the necessary tools and databases in place to ensure that relevant information can be exchanged between national authorities and authorities in different Member States where necessary. ACER should contribute with its expertise to the process of monitoring the implementation. To facilitate the creation of the necessary interoperable joint information systems, the Commission and Member States may explore</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>possibilities to make use of budget under the Internal Security Fund (ISF). Customs authorities should notify regulatory authorities, the national competent authority and the Commission on a monthly basis regarding key elements concerning the development of imports of Russian gas (such as quantities imported under long-term or short-term contracts, entry points, or contract partners).</p>	<p><u><a href="#">Regulation (EU) 2024/1787 ("Methane Regulation")</a></u>, in <u><a href="#">particular data related to gas supply chain traceability, to support the detection and prevention of circumvention</a></u>. <u><a href="#">Member States should ensure that customs authorities and other relevant authorities have adequate powers, functional independence, and the capabilities to fulfil the obligations set out in this Regulation</a></u>. ACER should contribute with its expertise to the process of monitoring the implementation. To facilitate the creation of the necessary interoperable joint information systems, the Commission and Member States may explore possibilities to make use of budget under the Internal Security Fund (ISF). Customs authorities should notify regulatory authorities, the national competent authority and the Commission on a monthly basis regarding key elements concerning the development of imports of Russian gas (such as quantities imported under long-term or short-term contracts, entry</p>	<p>possibilities to make use of budget under the Internal Security Fund (ISF). Customs authorities should notify regulatory authorities, the national competent authority and the Commission on a monthly basis regarding key elements concerning the development of imports of Russian gas (such as quantities imported under long-term or short-term contracts, entry points, or contract partners).moved to 22b</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<p>points, or contract partners).  <u>Where the Commission has doubts as to the effectiveness of monitoring at the Member State level, the Commission should request the necessary information from customs authorities and other relevant authorities.</u></p>		
Recital 21a				
33a		<p><u>(21a) There is increasing evidence that certain suppliers may resort to opaque maritime transport practices, including the use of so-called dark or shadow fleets that disable tracking systems, reflag vessels or conduct ship-to-ship transfers to obscure the origin, ownership and destination of energy shipments. Although such practices have been predominantly observed in oil transport, they could also pose risks for LNG imports, undermining the objectives of this Regulation. It is therefore necessary that Member States monitor maritime transport practices in their territorial waters, including by requesting any relevant documentation.</u></p>		
Recital 21b				

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
33b		<p><u>(21b) The Union has created a robust legal framework to ensure security of gas supply at all times, and to deal with possible supply crises in a coordinated manner, including obligations on Member States to provide for effective and operational solidarity to neighbours in need of gas. The Commission should constantly monitor the development of market risks for gas supply resulting from gas trade with Russia at Union, regional and Member State level. To avoid indirect circumvention of the prohibitions set out in this Regulation, the Commission should also constantly monitor the flows of Russian natural gas transiting through third countries, particularly Türkiye and Azerbaijan and carry out a risk-based analysis of LNG terminals to identify those for which there are reasonable grounds to suspect imports of Russian natural gas. The Commission should establish a list of such terminals, and could propose appropriate measures, including legislative proposals, to</u></p>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<u>mitigate identified risks. The Commission should also publish an annual report on natural gas flows from third countries, including an assessment of risks of circumvention.</u>		
Recital 21c				
33c		<u>(21c) The petrochemical industry is closely linked to the oil and gas industry, as its feedstocks are derived directly from oil refining and natural gas processing. To prevent circumvention of the ban on Russian crude oil and petroleum products, it is essential to closely monitor imports of petrochemical products CN Code 39 obtained in third countries from Russian crude oil. Failure to address these imports could risk the effectiveness of this Regulation. The Commission should therefore assess their impact and, where disruptions are confirmed, take appropriate measures, which may include a legislative proposal.</u>		
Recital 22				
34	(22) Russia is a major gas exporter and has not played any	(22) Russia is a major gas exporter and has not played any	(22) <b>Some of the Russian gas transmission infrastructure is</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>noticeable role as gas transit country in the past. This is due to several factors, such as the lack of regasification infrastructure, the organisation of gas trade in Russia via a pipeline export monopoly, business models of Russian gas companies which are not based on organising transits, or Russia’s geographical location. Therefore, imports of natural gas arriving via interconnection points between the Russian Federation and the Union are usually originating in, or exported directly or indirectly from the Russian Federation. The same consideration applies to gas imported via interconnection points between the Union and Serbia, as Serbia can, for technical reasons, only export gas of Russian origin towards the Union. Therefore, and taking into account incentives of Russian suppliers to circumvent the import ban, customs authorities should, where gas is imported via Russian or Serbian entry points, require clear and unambiguous unequivocal evidence to prove the non-Russian origin or the point of export of the gas. The submitted documents</p>	<p>noticeable role as gas transit country in the past. This is due to several factors, such as the lack of regasification infrastructure, the organisation of gas trade in Russia via a pipeline export monopoly, business models of Russian gas companies which are not based on organising transits, or Russia’s geographical location. Therefore, imports of natural gas arriving via interconnection points between the Russian Federation and the Union are usually originating in, or exported directly or indirectly from the Russian Federation. The same consideration applies to gas imported via interconnection points between the Union and Serbia, as Serbia can, for technical reasons, only export gas of Russian origin towards the Union. <i>Therefore, and taking into account incentives of Russian suppliers to circumvent</i> <u>In order to ensure that the measures to prevent the import ban, customs authorities of gas which originates in or is exported directly or indirectly from the Russian Federation are kept up to date, the power to adopt acts in accordance with</u></p>	<p><b>directly connected to the Union, and some transit pipelines connecting Russia with the Union are running through third countries without currently having any exit points between the Russian Federation and the Union. The Regulation should therefore presume that natural gas imported into the Union via borders, interconnectors, or interconnection points between the Russian Federation and the Union, Belarus and the Union or arriving via TurkStream at the interconnection point Strandzha 2 / Malkoclar originates in or is exported, directly or indirectly, from the Russian Federation, thus replacing the requirement to submit proof of the country of production. In case it is claimed that natural gas arriving at these borders, interconnectors, or interconnection points is under a ‘transit’ procedure through the Russian Federation, strict controls should apply. The Russian Federation is a major gas exporter and has not played any noticeable role as a gas transit</b></p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>should allow the traceability of the imported gas up to the place of production.</p>	<p><u>Article 290 of the Treaty on the Functioning of the European Union</u> should <del>be delegated to the Commission to amend the list of interconnection points</del> where gas is <del>imported via</del> <u>presumed to be exported directly or indirectly from the Russian or Serbian entry points, require clear and unambiguous unequivocal evidence to prove the non-Russian origin or the point of export of the gas. The submitted Federation. It is of particular importance that the Commission carry out appropriate consultations during its preparatory work, including at expert level, and that those consultations be conducted in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making*. In particular, to ensure equal participation in the preparation of delegated acts, the European Parliament and the Council should receive all documents <u>should allow the traceability of the imported gas up to the place of production at the same time as Member States' experts, and their</u></u></p>	<p>country in the past. <del>This is, due to several factors, such as the lack of regasification infrastructure, the organisation of gas trade in Russia</del> <b>the Russian Federation</b> via a pipeline export monopoly, business models of Russian gas companies which are not based on organising transits, <del>or Russia and the Russian Federation's</del> geographical location. <del>Therefore, imports of natural gas arriving via interconnection points between the Russian Federation and the Union are usually originating in, or exported directly or indirectly from the Russian Federation. The same consideration applies to gas imported via interconnection points between the Union and Serbia, as Serbia can, for technical reasons, only export gas of Russian origin towards the Union. Therefore, and taking into account incentives of Russian suppliers to circumvent the import ban</del> <b>prohibition</b>, customs authorities should, <del>where gas is imported via Russian or Serbian entry points, require clear and unambiguous unequivocal</del> <b>refuse the import of volumes of natural gas</b></p>	

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
		<u><i>experts systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.</i></u>	allegedly in transit unless unequivocal evidence to prove the non-Russian origin or the point of export of can be provided which proves that the gas has been in transit through the Russian Federation and that it was produced in a country other than the Russian Federation. The submitted documents should allow for the traceability of the imported gas up to the place of production.	
Recital 22a				
34a			(22a) Furthermore, significant volumes of natural gas may also enter the Union under a ‘transit’ procedure. As the strict monitoring rules for gas imports such as the prior authorisation do not apply to gas crossing the Union under a ‘transit’ procedure, it is appropriate to provide for specific safeguards in the form of a transit monitoring regime, which enables customs to effectively monitor gas flows under a ‘transit’ procedure, to ensure that natural gas which crosses the Union under a ‘transit’	

	<small>CLEAN</small> <b>Commission Proposal</b>	<small>VS.EC</small> <b>EP Mandate</b>	<small>VS.EC</small> <b>Council Mandate</b>	<small>VS.EC</small> <b>Draft Agreement</b>
			<b>procedure is not ultimately entering into free circulation in the Union.</b>	
<b>Recital 22b</b>				
34b			<b>(22b) In line with the principle of sincere cooperation, authorising authorities, customs authorities, regulatory authorities, competent authorities, the Agency for the Cooperation of Energy Regulators (ACER) and the Commission should cooperate to implement the provisions of this Regulation and exchange relevant information, in particular regarding the assessment of exemptions allowing imports of Russian natural gas after 1 January 2026. Customs authorities, regulatory authorities, competent authorities and ACER should have the necessary tools and databases in place to ensure, where necessary, that relevant information can be exchanged between national authorities and authorities in different Member States. ACER should contribute</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			<p><b>its expertise to the process of monitoring the implementation. To facilitate the creation of the necessary interoperable joint information systems, the Commission and Member States may explore possibilities to make use of the budget available under the Internal Security Fund (ISF). Customs authorities should update regulatory authorities, the competent authorities and the Commission on a monthly basis on the key elements concerning the development of imports of Russian gas, such as quantities imported under long-term or short-term supply contracts, entry points, or contract partners.</b></p> <p>recital 21 moved</p>	
Recital 23				
35	(23) Experience with the announced phase out of gas supplies via Ukraine has shown that good preparation and coordination in a spirit of solidarity can effectively avoid market disruptions or security of	(23) Experience with the announced phase out of gas supplies via Ukraine has shown that good preparation and coordination in a spirit of solidarity can effectively avoid market disruptions or security of	(23) <del>The experience with the announced phase out of</del> <b>phase-out of Russian</b> gas supplies via Ukraine has shown that good preparation and coordination in a spirit of solidarity can effectively avoid market disruptions or	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>supply problems potentially resulting from changing gas suppliers. To prepare for the full phase out of Russian gas in 2028 in a coordinated manner and to give the market sufficient time to anticipate the changes involved without risk for security of gas supply or a significant impact on energy prices, Member States should prepare national diversification plans and present them by 1 March 2026. Those plans should describe intended measures at national or regional level to reduce demand, foster renewable energy production and ensure alternative supplies, as well as possible technical or regulatory barriers which may complicate the diversification process. As the diversification process may require coordination of measures at national, regional or Union level, the Commission should assess the national diversification plans, with the possibility to issue recommendations suggesting adaptations where necessary.</p>	<p>supply problems potentially resulting from changing gas suppliers. To prepare for the full phase out of Russian gas in <del>2028</del>2027 in a coordinated manner and to give the market sufficient time to anticipate the changes involved without risk for security of gas supply or a significant impact on energy prices, Member States should prepare national diversification plans and present them by 1 March 2026. Those plans should describe intended measures at national or regional level to reduce demand, foster renewable energy production and ensure alternative supplies, as well as possible technical or regulatory barriers which may complicate the diversification process, <u>and measures to ensure full transparency and actual control preventing possible circumvention</u>. As the diversification process may require coordination of measures at national, regional or Union level, the Commission should assess the national diversification plans, with the possibility to issue <del>recommendations suggesting</del></p>	<p>security of supply problems potentially resulting from changing gas suppliers. To prepare for the full <del>phase-out</del>phase-out of Russian gas in 2028 in a coordinated manner, and to give the market sufficient time to anticipate the changes involved without risk <del>for</del>to the security of gas supply or a significant impact on energy prices, Member States should prepare national diversification plans and present them by 1 March 2026. Those plans <b>should be subject to the rules of professional secrecy and not be disclosed without the agreement of the respective Member State.</b> They should describe intended measures at national or regional level to reduce demand, foster renewable energy production and ensure alternative supplies, as well as possible technical, <b>contractual</b> or regulatory barriers which may complicate the diversification process. As the diversification process may require coordination of measures at national, regional or Union level, the Commission should assess the national</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<del>adaptations</del> <u>decisions to adapt those plans</u> where necessary.	diversification plans, with the possibility to issue recommendations suggesting adaptations where necessary.	
Recital 24				
36	(24) In their Versailles Declaration, the Heads of Member States committed not only to phase out natural gas supplies from Russia, but also other energy supplies, notably oil supplies. While restrictive measures to ensure the phase out of oil imports from Russia are already in place, and oil imports have decreased significantly, a further phase out of Russian oil may require specific preparatory steps and coordination with neighbours. Member States should therefore prepare national diversification plans also for oil, with a possibility for the Commission to provide recommendations on those plans.	(24) <del>In their Versailles Declaration, the Heads of Member States committed not only to phase out natural gas supplies from Russia, but also other energy supplies, notably oil supplies. While restrictive measures to ensure the phase out of oil imports from Russia are already in place, and oil imports have decreased significantly, a further phase out of Russian oil may require specific preparatory steps and coordination with neighbours. Member States should therefore prepare national diversification plans also for oil, with a possibility for the Commission to provide recommendations on those plans.</del> <u>deleted</u>	(24) In their Versailles Declaration, the Heads of Member States <b>State or Government</b> committed not only to phase out natural gas supplies from Russia <b>the Russian Federation</b> , but also other energy supplies, notably <b>in particular</b> oil supplies. While restrictive measures to ensure the <del>phase out</del> <b>phase-out</b> of oil imports from Russia <b>the Russian Federation</b> are already in place, and oil imports have decreased significantly, a further <del>phase out</del> <b>phase-out</b> of Russian oil may require specific preparatory steps and coordination with neighbours. Member States should therefore <b>also</b> prepare national diversification plans <del>also</del> for oil, with a possibility for the Commission to provide recommendations on those plans. <b>Those plans should be subject to the rules of professional secrecy and not be disclosed without the</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			agreement of the respective Member State.	
Recital 25				
37	(25) Experience during the gas crisis of 2022 and 2023 has shown that showed that comprehensive information on the supply situation and possible supply dependencies is crucial to monitor gas supply in the Union. Therefore importers of Russian gas making use of the exemptions laid down in this Regulation should submit to the Commission all information which is necessary to effectively evaluate possible risks for gas trade. That information should include key parameters, or even whole text parts, of the relevant gas supply contracts, excluding price information, where this is necessary to understand the context of certain clauses or references to other provisions in the contract. When monitoring gas supply in the Union, the Commission should also take into account information on imports provided by customs authorities and information included in national diversification plans. The	(25) Experience during the gas crisis of 2022 and 2023 has shown <del>that showed</del> that comprehensive information on the supply situation and possible supply dependencies is crucial to monitor gas supply in the Union. Therefore importers of Russian gas making use of the exemptions laid down in this Regulation should submit to the Commission all information which is necessary to effectively evaluate possible risks for gas trade. That information should include key parameters, or even whole text parts, of the relevant gas supply contracts, excluding price information, where this is necessary to understand the context of certain clauses or references to other provisions in the contract. When monitoring gas supply in the Union, the Commission should also take into account information on imports provided by customs authorities and information included in national diversification plans. The	(25) <b>The</b> experience during the gas crisis of 2022 and 2023 <del>has shown that</del> showed that comprehensive information on the supply situation and possible supply dependencies is crucial <del>to monitor</del> <b>for monitoring</b> gas supply in the Union. Therefore, importers of Russian gas making use of the exemptions <del>laid down</del> <b>set out</b> in this Regulation should submit to the Commission all information <del>which is</del> necessary to effectively evaluate possible risks for gas trade. That information should include key parameters, or even <del>whole-text</del> parts <b>in full</b> , of the relevant gas supply contracts, excluding price information, where <del>this</del> <b>that</b> is necessary to understand the context of certain clauses or references to other provisions in the contract. When monitoring gas supply in the Union, the Commission should also take into account information on imports provided by customs authorities and information	

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
	Commission should regularly inform the Gas Coordination Group established by Regulation (EU) 2017/1938 about the phase-out process at the Union level and submit an annual report on the Russian gas phase-out, which may be accompanied by specific Union recommendations and actions to accelerate the phase-out process.	Commission should regularly inform the Gas Coordination Group established by Regulation (EU) 2017/1938 about the phase-out process at the Union level and submit an annual report on the Russian gas phase-out, which may be accompanied by specific Union recommendations and actions to accelerate the phase-out process.	included in national diversification plans. The Commission should regularly inform the Gas Coordination Group established by Regulation (EU) 2017/1938 about the phase-out process at the Union level and submit an annual report on the Russian gas phase-out, which may be accompanied by specific Union recommendations and actions to accelerate the phase-out process.	
Recital 26				
38	(26) Member States and Union should cooperate closely in the implementation of this Regulation. With a view to the recent practice of the Russian Federation to unilaterally change agreed court and arbitration procedures in a manner not compatible with international customary law or bilateral investment treaties entered between Member States and Russia, it follows from international law that affected companies and Member States cannot be held liable for any judgments, arbitral awards, including investor-State arbitral awards, or other judicial decisions	(26) Member States and Union should cooperate closely in the implementation of this Regulation. With a view to the recent practice of the Russian Federation to unilaterally change agreed court and arbitration procedures in a manner not compatible with international customary law or bilateral investment treaties entered between Member States and Russia, it follows from international law that affected companies and Member States cannot be held liable for any judgments, arbitral awards, including investor-State arbitral awards, or other judicial decisions	(26) Member States and <b>the</b> Union should cooperate closely <del>in</del> the implementation of this Regulation. <del>With a view to the recent practice of the Russian Federation to unilaterally change agreed court and arbitration procedures in a manner not compatible with international customary law or bilateral investment treaties entered between Member States and Russia, it follows from international law that affected companies and Member States cannot be held liable for any judgments, arbitral awards, including investor-State arbitral</del>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>adopted under procedures which are illegal under international customary law or under a bilateral investment treaty, and against which the person or Member State concerned does not have effective access to the remedies under the relevant jurisdiction. With respect to financial responsibilities concerning possible investor-to-state dispute settlement resolution cases, reference is made, to Regulation (EU) 912/2014<sup>1</sup>, where applicable.</p> <p><sup>1</sup> Regulation (EU) No 912/2014 of the European Parliament and of the Council of 23 July 2014 establishing a framework for managing financial responsibility linked to investor-to-state dispute settlement tribunals established by international agreements to which the European Union is party, OJ L 257, 28.8.2014, p. 121.</p>	<p>adopted under procedures which are illegal under international customary law or under a bilateral investment treaty, and against which the person or Member State concerned does not have effective access to the remedies under the relevant jurisdiction. With respect to financial responsibilities concerning possible investor-to-state dispute settlement resolution cases, reference is made, to Regulation (EU) 912/2014<sup>1</sup>, where applicable.</p> <p><sup>1</sup> Regulation (EU) No 912/2014 of the European Parliament and of the Council of 23 July 2014 establishing a framework for managing financial responsibility linked to investor-to-state dispute settlement tribunals established by international agreements to which the European Union is party, OJ L 257, 28.8.2014, p. 121.</p>	<p><del>awards, or other judicial decisions adopted under</del> <b>in relation to possible dispute settlement</b> procedures which are illegal under international customary law or under a bilateral investment treaty, and against which the person or Member State concerned does not have effective access to the remedies under the relevant jurisdiction. With respect to. <b>Where applicable, Regulation (EU) 1219/2012<sup>1</sup> and Regulation (EU) 912/2014<sup>2</sup> set out further details on cooperation and allocation of financial responsibilities between the Member States and the Union</b> concerning possible investor-to-state dispute settlement resolution cases, <del>reference is made, to</del> <b>related to this Regulation.</b> <del>(EU) 912/2014<sup>3</sup>, where applicable.</del></p> <p><sup>1</sup> Regulation (EU) No <del>912/2014</del> <b>1219/2012</b> of the European Parliament and of the Council of <del>23 July 2014</del> <b>12 December 2012</b> establishing a framework for managing financial responsibility linked to investor to state dispute settlement tribunals established by <del>international</del> <b>transitional arrangements for bilateral investment</b> agreements to which the European Union is party, OJ L</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			257, 28.8.2014, p. 121 between Member States and third countries (OJ L 351, 20.12.2012, p. 40). 2. Regulation (EU) No 912/2014 of the European Parliament and of the Council of 23 July 2014 establishing a framework for managing financial responsibility linked to investor-to-state dispute settlement tribunals established by international agreements to which the European Union is party (OJ L 257, 28.8.2014, p. 121).	
Recital 26a				
38a			<b>(26a) In view of the recent practice of the Russian Federation to unilaterally change and impede agreed court and arbitration procedures, neither affected persons, nor the Union and Member States can be held liable for any judgments, arbitral awards, or other judicial decisions adopted under illegal procedures against which no remedies are effectively accessible under the relevant jurisdiction.</b>  middle part from previous recital	We maintain our position on strengthening the necessary safeguards in the text of the regulation to protect from potential arbitration cases and financial penalties companies with long-term transmission contracts and reserved capacity for pipeline gas. In this regard, we believe that a legal text is also needed in the main body of the regulation (proposal to insert a new Article 3(3)).
Recital 27				
39	(27) The Union has created a robust legal framework to ensure security of gas supply at all times,	(27) <i>The Union has created a robust legal framework to ensure security of gas supply at all times;</i>	(27) The Union has created a robust legal framework to ensure the security of gas supply at all	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>and to deal with possible supply crises in a coordinated manner, including obligations on Member States to provide for effective and operational solidarity to neighbours in need of gas. The Commission should constantly monitor the development of market risks for gas supply resulting from gas trade with Russia at Union, regional and Member State level. In case of sudden and significant developments, which seriously threaten the security of supply of one or more Member States, it is appropriate to empower the Commission to take the necessary emergency measures by authorising one or more Member States not to apply the import prohibitions concerning natural gas or LNG imports set out in this Regulation. Such an authorisation should be limited in time and the Commission implementing decision may impose certain additional conditions, to ensure that any suspension is strictly limited to addressing the threat. The Commission should closely</p>	<p><del>and to deal with possible supply crises in a coordinated manner, including obligations on Member States to provide for effective and operational solidarity to neighbours in need of gas. The Commission should constantly monitor the development of market risks for gas supply resulting from gas trade with Russia at Union, regional and Member State level. In case of sudden and significant developments, which seriously threaten the security of supply of one or more Member States, it is appropriate to empower the Commission to take the necessary emergency measures by authorising one or more Member States not to apply the import prohibitions concerning natural gas or LNG imports set out in this Regulation. Such an authorisation should be limited in time and the Commission implementing decision may impose certain additional conditions, to ensure that any suspension is strictly limited to addressing the threat. The Commission should closely monitor the application of any</del></p>	<p>times, and to deal with possible supply crises in a coordinated manner, including obligations <del>on</del>for Member States to provide for effective and operational solidarity to neighbours in need of gas. The Commission should constantly monitor the development of market risks for gas supply resulting from gas trade with <del>Russia</del>the <b>Russian Federation</b> at Union, regional and Member State level. In case of sudden and significant developments, <b>such as the unavailability of key import infrastructures or other types of significant disruptions of supply</b>, which seriously threaten the security of supply of one or more Member States, it is appropriate to empower the Commission to take the necessary emergency measures by <del>authorising one or more Member States not to</del> <b>suspending</b> the import prohibitions concerning natural gas or LNG imports set out in this Regulation <b>in one or more Member States. The Commission should, in such a situation, also be able to suspend</b></p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	monitor the application of any such temporary authorisation.	<del>such temporary authorisation.</del> <u>deleted</u>	the obligation to submit proof of the country of production prior to the entry into the Union's customs territory, in order to facilitate additional imports on short notice. Such a suspension- Such an authorisation should be limited in time and the Commission implementing decision <del>may</del> <b>should</b> impose certain additional conditions, to ensure that any <b>such</b> suspension is strictly limited to addressing the threat. The Commission should <b>inform the Gas Coordination Group, and should</b> closely monitor the application of any such temporary authorisation <b>suspension.</b>	
Recital 27a				
39a		<u>(27a) To ensure compliance with this Regulation, Member States should establish penalties that are effective, proportionate and dissuasive. These penalties should take into account the seriousness and duration of the infringement, any advantages gained, cooperation with authorities, past conduct, and other relevant circumstances. A</u>		Bulgaria supports the objective of ensuring compliance with the Regulation; however, we do not support introducing penalties because of the additional administrative burden.

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<u><i>harmonised provision of penalties, when applying administrative fines, should be introduced, to ensure consistent application of this Regulation across the Member States. By one month from the entry into force of this Regulation, Member States should inform the Commission of the penalty rules they adopt and of any later changes without undue delay.</i></u>		
Recital 28				
40	(28) The proposed measures fully reflect the principle of energy solidarity. Indeed, the level of exposure to Russian gas imports differs between Member States, and many Member States have already taken measures to phase out Russian gas. The proposal for this Regulation will ensure an EU-wide harmonised approach to the phase out of Russian gas, preserving solidarity between Member States.	(28) The proposed measures fully reflect the principle of energy solidarity. Indeed, the level of exposure to Russian gas imports differs between Member States, and many Member States have already taken measures to phase out Russian gas. The proposal for this Regulation will ensure an EU-wide harmonised approach to the phase out of Russian gas, preserving solidarity between Member States.	(28) The <del>proposed</del> measures <b>introduced with this Regulation</b> fully reflect the principle of energy solidarity. Indeed, the level of exposure to Russian gas imports differs between Member States, and many Member States have already taken measures to phase out Russian gas. <del>The proposal for</del> This Regulation will ensure an EU-wide harmonised approach to the <del>phase-out</del> <b>phase-out</b> of Russian gas, preserving solidarity between Member States.	
Recital 29				
41	(29) Since the objectives of this Regulation relating to the	(29) Since the objectives of this Regulation relating to the	(29) Since the objectives of this Regulation relating to the	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	monitoring of possible gas dependencies cannot be sufficiently achieved by the Member States in a coordinated manner and without risk of market fragmentation, but can be better and more efficiently achieved at Union level, the Union may adopt measures, in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union. In accordance with the principle of proportionality, as set out in that Article, this Regulation does not go beyond what is necessary in order to achieve that objective.	monitoring of possible gas dependencies cannot be sufficiently achieved by the Member States in a coordinated manner and without risk of market fragmentation, but can be better and more efficiently achieved at Union level, the Union may adopt measures, in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union. In accordance with the principle of proportionality, as set out in that Article, this Regulation does not go beyond what is necessary in order to achieve that objective.	monitoring of possible gas dependencies cannot be sufficiently achieved by the Member States in a coordinated manner and without risk of market fragmentation, but can be better and more efficiently achieved at Union level, the Union may adopt measures, in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union. In accordance with the principle of proportionality, as set out in that Article, this Regulation does not go beyond what is necessary in order to achieve that objective.	
Recital 30				
42	(30) In view of the importance for the Union to phase out further economic dependence of the Union on gas imports from the Russian Federation without any delay, this Regulation should enter into force on the day following that of its publication in the Official Journal of the European Union,	(30) In view of the importance for the Union to phase out further economic dependence of the Union on gas imports from the Russian Federation without any delay, this Regulation should enter into force on the day following that of its publication in the Official Journal of the European Union,	(30) In view of the importance for the Union to phase out further economic dependence of the Union on gas imports from the Russian Federation without any delay, this Regulation should enter into force on the day following that of its publication in the Official Journal of the European Union. <b>Market participants had significant time to adapt their supply portfolio after the Versailles Declaration of March</b>	

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			<p>2022 and the adoption of the proposal for this Regulation on 17 June 2025. Nevertheless, it appears appropriate to provide for a transition period to allow gas suppliers which have not yet adapted their supply strategies to make the necessary arrangements to comply with this Regulation. The prohibition to import gas from the Russian Federation should therefore only apply as of [OJ please insert the date 6 weeks after entry into force of this Regulation]. In order to allow importers with existing supply contracts and importers concluding new contracts to carry out the necessary prior authorisation in a timely manner and without disruptions for planned gas imports, the different authorisation processes provided for in this Regulation should already apply before the prohibition of imports of gas from the Russian Federation becomes applicable.</p>	
Formula				

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
43	HAVE ADOPTED THIS REGULATION:	HAVE ADOPTED THIS REGULATION:	HAVE ADOPTED THIS REGULATION:	
CHAPTER I				
44	CHAPTER I GENERAL PROVISIONS	CHAPTER I GENERAL PROVISIONS	CHAPTER I GENERAL PROVISIONS	
Article 1				
45	Article 1 Subject matter	Article 1 Subject matter	Article 1 Subject matter	
Article 1, first paragraph				
46	This Regulation provides a framework for effectively removing the Union's exposure to the significant risks for trade and security, resulting from gas trade with the Russian Federation by laying down:	This Regulation provides a framework for effectively <del>removing</del> <u>eliminating</u> the Union's <u>remaining</u> exposure to the significant risks for trade and security, resulting from gas <u>and oil</u> trade with the Russian Federation by laying down:	This Regulation provides a framework for effectively removing the Union's exposure to the significant risks for trade and security <b>of supply</b> , resulting from gas trade with the Russian Federation by laying down:	
Article 1, first paragraph, point (a)				
47	(a) a stepwise prohibition of imports of natural gas from the Russian Federation and of the provision of LNG terminal services;	(a) a stepwise prohibition of imports <u>and temporary storage</u> of natural gas from the Russian Federation and of the provision of LNG terminal services;	(a) a stepwise prohibition of imports of natural gas from the Russian Federation <del>and of the provision of LNG terminal services;</del>	We do not support the proposed extension of the prohibition to the temporary storage of Russian-origin gas in EU storage facilities. Such a measure goes beyond the scope and objectives of the REPowerEU Regulation, which target imports into the Union rather than storage operations. It could also create unintended risks for the functioning of the internal gas

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				market and the flexibility of the EU storage system, particularly in cases where gas is transiting or re-exported to third countries.
Article 1, first paragraph, point (aa)				
47a		<u><i>(aa) a prohibition of oil imports, including petroleum product imports, from the Russian Federation;</i></u>		Bulgaria does not support the proposed extension of the scope and objectives of the REPowerEU Regulation. It could create unintended risks for the functioning of the internal market.
Article 1, first paragraph, point (b)				
48	(b) rules to effectively implement and monitor that prohibition as well as the phase out of oil imports from Russia;	(b) rules to effectively implement and monitor <del>that prohibition as well as the phase out of oil imports from Russia;</del> <u>those prohibitions;</u>	(b) rules to effectively implement and monitor that prohibition as well as the <del>phase out</del> <b>phase-out</b> of oil imports from <del>Russia</del> <b>the Russian Federation;</b>	
Article 1, first paragraph, point (c)				
49	(c) provisions to better assess the security of energy supplies in the Union.	(c) provisions to better assess the security of energy supplies in the Union.	(c) provisions to better assess the security of energy supplies in the Union.	
Article 2				
50	Article 2 Definitions	Article 2 Definitions	Article 2 Definitions	
Article 2, first paragraph				
51	For the purpose of this Regulation, the following definitions shall apply:	For the purpose of this Regulation, the following definitions shall apply:	For the purpose of this Regulation, the following definitions shall apply:	

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
Article 2, first paragraph, point (1)				
52	<p>(1) ‘natural gas’ means natural gas as defined in Article 2, point (1), of Directive (EU) 2024/1788 of the European Parliament and of the Council<sup>1</sup> and as referred to in Combined Nomenclature (CN) codes 2711 11 00 and 2711 21 00;</p> <p><sup>1</sup> Directive (EU) 2024/1788 of the European Parliament and of the Council of 13 June 2024 on common rules for the internal markets for renewable gas, natural gas and hydrogen, amending Directive (EU) 2023/1791 and repealing Directive 2009/73/EC (OJ L, 2024/1788, 15.7.2024, ELI: <a href="http://data.europa.eu/eli/dir/2024/1788/oj">http://data.europa.eu/eli/dir/2024/1788/oj</a>).</p>	<p>(1) ‘natural gas’ means natural gas as defined in Article 2, point (1), of Directive (EU) 2024/1788 of the European Parliament and of the Council<sup>1</sup> and as referred to in Combined Nomenclature (CN) codes 2711 11 00 and 2711 21 00;</p> <p><sup>1</sup> Directive (EU) 2024/1788 of the European Parliament and of the Council of 13 June 2024 on common rules for the internal markets for renewable gas, natural gas and hydrogen, amending Directive (EU) 2023/1791 and repealing Directive 2009/73/EC (OJ L, 2024/1788, 15.7.2024, ELI: <a href="http://data.europa.eu/eli/dir/2024/1788/oj">http://data.europa.eu/eli/dir/2024/1788/oj</a>).</p>	<p>(1) ‘natural gas’ means <del>natural gas as defined in Article 2, point (1), of Directive (EU) 2024/1788 of the European Parliament and of the Council<sup>1</sup></del> <b>and gas</b> as referred to in Combined Nomenclature (CN) codes 2711 11 00 and 2711 21 00;</p> <p><del><sup>1</sup> Directive (EU) 2024/1788 of the European Parliament and of the Council of 13 June 2024 on common rules for the internal markets for renewable gas, natural gas and hydrogen, amending Directive (EU) 2023/1791 and repealing Directive 2009/73/EC (OJ L, 2024/1788, 15.7.2024, ELI: <a href="http://data.europa.eu/eli/dir/2024/1788/oj">http://data.europa.eu/eli/dir/2024/1788/oj</a>).</del></p>	
Article 2, first paragraph, point (2)				
53	<p>(2) ‘LNG’ means liquefied natural gas as referred to in CN code 2711 11 00;</p>	<p>(2) ‘LNG’ means liquefied natural gas as referred to in CN code 2711 11 00;</p>	<p>(2) ‘LNG’ means liquefied natural gas as referred to in CN code 2711 11 00;</p>	
Article 2, first paragraph, point (3)				
54	<p>(3) ‘natural gas in gaseous state’ means natural gas as referred to in CN code 2711 21 00;</p>	<p>(3) ‘natural gas in gaseous state’ means natural gas as referred to in CN code 2711 21 00;</p>	<p>(3) ‘natural gas in gaseous state’ means natural gas as referred to in CN code 2711 21 00;</p>	
Article 2, first paragraph, point (3a)				
54a			<p><b>(3a) ‘mixtures’ means mixtures of LNG volumes from different countries of origin;</b></p>	

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Article 2, first paragraph, point (4)				
55	(4) 'long-term supply contract' means a contract for the supply of natural gas, excluding a natural gas derivative, exceeding one year;	(4) 'long-term supply contract' means a contract for the supply of natural gas, excluding a natural gas derivative, exceeding one year;	(4) 'long-term supply contract' means a contract for the supply of natural gas, excluding a natural gas derivative, exceeding one year;	
Article 2, first paragraph, point (5)				
56	(5) 'short-term supply contract' means a contract for the supply of natural gas, excluding a natural gas derivative, not exceeding one year;	(5) 'short-term supply contract' means a contract for the supply of natural gas, excluding a natural gas derivative, not exceeding one year;	(5) 'short-term supply contract' means a contract for the supply of natural gas, excluding a natural gas derivative, not exceeding one year;	
Article 2, first paragraph, point (5a)				
56a			<b>(5a) 'country of production' means the country where the natural gas is extracted. Where natural gas extracted in other countries than the Russian Federation is liquified or re-gasified in the Russian Federation, the Russian Federation shall be considered the country of production;</b>	
Article 2, first paragraph, point (6)				
57	(6) 'landlocked country' means a country that is entirely surrounded by land and has not direct access to the sea;	(6) <del>'landlocked country' means a country that is entirely surrounded by land and has not direct access to the sea;</del> <del>deleted</del>	(6) 'landlocked country' means a country that is entirely surrounded by land and has <del>no</del> direct access to the sea;	
Article 2, first paragraph, point (6a)				

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57a			(6a) <b>‘import’ means the placing of goods under release for free circulation, as referred to in Article 201 of Regulation (EU) No 952/2013 of the European Parliament and of the Council;</b>	
Article 2, first paragraph, point (7)				
58	(7) <b>‘importer’ means a natural or legal person who has the power to determine and has determined that natural gas from a third country is to be brought into the customs territory of or otherwise placed on the Union market;</b>	(7) <b>‘importer’ means a natural or legal person who has the power to determine and has determined that natural gas from a third country is to be brought into the customs territory of or otherwise placed on the Union market;</b>	(7) <b>‘importer’ means the natural or legal person that is the declarant in the relevant customs declaration as defined in Article 5, point (15), of Regulation (EU) No 952/2013 of the European Parliament and of the Council, or otherwise a natural or legal person who has the power to determine and has determined that natural gas from a third country is to be brought, including affiliated undertakings, that brings the goods into the Union customs territory of or otherwise placed on the Union market;</b>	
Article 2, first paragraph, point (7a)				
58a			(7a) <b>‘affiliated undertaking’ means an undertaking as defined in Article 2, point (12), of Directive 2013/34/EU of the</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			<p><b>European Parliament and of the Council</b>;</p> <p>1. Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC (OJ L 182, 29.6.2013, p. 19).</p>	
Article 2, first paragraph, point (8)				
59	<p>(8) ‘customs authority’ means a customs authority as defined in Article 5, point (1), of Regulation (EU) No 952/2013 of the European Parliament and of the Council<sup>1</sup>;</p> <p>1. Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code (OJ L 269, 10.10.2013, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2013/952/oj">http://data.europa.eu/eli/reg/2013/952/oj</a>).</p>	<p>(8) ‘customs authority’ means a customs authority as defined in Article 5, point (1), of Regulation (EU) No 952/2013 of the European Parliament and of the Council<sup>1</sup>;</p> <p>1. Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code (OJ L 269, 10.10.2013, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2013/952/oj">http://data.europa.eu/eli/reg/2013/952/oj</a>).</p>	<p>(8) ‘customs authority’ means a customs authority as defined in Article 5, point (1), of Regulation (EU) No 952/2013 of the European Parliament and of the Council<sup>1</sup>;</p> <p>1. Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code (OJ L 269, 10.10.2013, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2013/952/oj">http://data.europa.eu/eli/reg/2013/952/oj</a>).</p>	
Article 2, first paragraph, point (8a)				
59a			<p><b>(8a) ‘authorising authority’ means the authority which is competent to examine the authorisation requests made pursuant to Article 7(1) and (2);</b></p>	

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Article 2, first paragraph, point (9)				
60	<p>(9) ‘competent authority’ means a competent authority as defined in Article 2, point (7), of Regulation (EU) 2017/1938 of the European Parliament and of the Council<sup>1</sup>;</p> <p>1. 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 (OJ L 280, 28.10.2017, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2017/1938/oj">http://data.europa.eu/eli/reg/2017/1938/oj</a>)</p>	<p>(9) ‘competent authority’ means a competent authority as defined in Article 2, point (7), of Regulation (EU) 2017/1938 of the European Parliament and of the Council<sup>1</sup>;</p> <p>1. 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 (OJ L 280, 28.10.2017, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2017/1938/oj">http://data.europa.eu/eli/reg/2017/1938/oj</a>)</p>	<p>(9) ‘competent authority’ means a competent authority as defined in Article 2, point (7), of Regulation (EU) 2017/1938 of the European Parliament and of the Council<sup>1</sup>;</p> <p>1. 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 (OJ L 280, 28.10.2017, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2017/1938/oj">http://data.europa.eu/eli/reg/2017/1938/oj</a>)</p>	
Article 2, first paragraph, point (10)				
61	<p>(10) ‘regulatory authority’ means a regulatory authority designated in accordance with Article 76(1) of Directive (EU) 2024/1788;</p>	<p>(10) ‘regulatory authority’ means a regulatory authority designated in accordance with Article 76(1) of Directive (EU) 2024/1788;</p>	<p>(10) ‘regulatory authority’ means a regulatory authority designated <del>in accordance</del> <b>with pursuant to</b> Article 76(1) of Directive (EU) 2024/1788;</p>	
Article 2, first paragraph, point (11)				
62	<p>(11) ‘control’ means control as defined in Article 2, point (55), of Directive (EU) 2024/1788;</p>	<p>(11) ‘control’ means control as defined in Article 2, point (55), of Directive (EU) 2024/1788;</p>	<p>(11) ‘control’ means control as defined in Article 2, point (55), of Directive (EU) 2024/1788;</p>	
Article 2, first paragraph, point (12)				
63	<p>(12) ‘long-term LNG terminal services’ means services provided by LNG system operators to customers, in particular</p>	<p>(12) ‘long-term LNG terminal services’ means services provided by LNG system operators to customers, in particular</p>	<p>(12) <del>‘long-term LNG terminal services’ means services provided by LNG system operators to customers, in particular</del></p>	

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	offloading, storage, sending out, berthing (loading and unloading), regassification, backhaul liquefaction, truck loading, bunkering of LNG, and including ancillary services and temporary storage necessary for the re-gasification process and subsequent delivery to the transmission system under contracts with a duration of more than one year;	offloading, storage, sending out, berthing (loading and unloading), regassification, backhaul liquefaction, truck loading, bunkering of LNG, and including ancillary services and temporary storage necessary for the re-gasification process and subsequent delivery to the transmission system under contracts with a duration of more than one year;	<del>offloading, storage, sending out, berthing (loading and unloading), regassification, backhaul liquefaction, truck loading, bunkering of LNG, and including ancillary services and temporary storage necessary for the re-gasification process and subsequent delivery to the transmission system under contracts with a duration of more than one year;</del> <b>deleted</b>	
Article 2, first paragraph, point (13)				
64	(13) ‘interconnection point’ means an interconnection point as defined in Article 2, point (63), of Directive (EU) 2024/1788;	(13) ‘interconnection point’ means an interconnection point as defined in Article 2, point (63), of Directive (EU) 2024/1788;	(13) ‘interconnection point’ means an interconnection point as defined in Article 2, point (63), of Directive (EU) 2024/1788;	
Article 2, first paragraph, point (13a)				
64a			<b>(13a) ‘interconnector’ means an interconnector as defined in Article 2, point (39), of Directive (EU) 2024/1788;</b>	
Article 2, first paragraph, point (14)				
65	(14) ‘entry point’ means an entry point as defined in Article 2, point (61), of Directive (EU) 2024/1788;	(14) ‘entry point’ means an entry point as defined in Article 2, point (61), of Directive (EU) 2024/1788;	(14) ‘entry point’ means an entry point as defined in Article 2, point (61), of Directive (EU) 2024/1788;	
Article 2, first paragraph, point (14a)				

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65a			(14a) ‘delivery point’ means the physical or virtual location specified in a gas supply contract at which natural gas is to be delivered by a seller and received by a buyer;	
Article 2, first paragraph, point (15)				
66	(15) ‘virtual trading point’ means virtual trading point as defined in Article 2, point (59), of Directive (EU) 2024/1788;	(15) ‘virtual trading point’ means virtual trading point as defined in Article 2, point (59), of Directive (EU) 2024/1788;	(15) <del>‘virtual trading point’ means virtual trading point as defined in Article 2, point (59), of Directive (EU) 2024/1788;</del> <b>deleted</b>	
Article 2, first paragraph, point (16)				
67	(16) ‘contracted quantities’ means the quantities of natural gas that the buyer or the importer is obligated to purchase and the seller or the exporter is obligated to provide, as specified in the supply contract, excluding volumes arising from adjustments to the contract, such as make-up quantities, shortfall recoveries, or other volumetric modifications under the terms of the contract; for long-term supply contracts, it means the annual contracted quantities;	(16) ‘contracted quantities’ means the quantities of natural gas that the buyer or the importer is obligated to purchase and the seller or the exporter is obligated to provide, as specified in the supply contract, excluding volumes arising from adjustments to the contract, such as make-up quantities, shortfall recoveries, or other volumetric modifications under the terms of the contract; for long-term supply contracts, it means the annual contracted quantities;	(16) ‘contracted quantities’ means the quantities of natural gas that <del>the</del> buyer or <del>the</del> importer is obligated to purchase and <del>the</del> seller or <del>the</del> exporter is obligated to provide, as specified in the <b>original</b> supply contract, <b>but</b> excluding volumes arising from <del>adjustments to the contract, such as make-up</del> <b>contractual provisions providing for quantity changes to baseline quantities, shortfall recoveries such as round-up quantities, fractional quantities, upward quantities</b> or other volumetric modifications under the terms of the contract; for long-term supply	

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			contracts, it means the annual contracted quantities paid before 17 June 2025;	
Article 2, first paragraph, point (16a)				
67a			(16a) ‘round-up quantities’ means volumes of natural gas added to the annual contracted quantity in a given year to provide for the last cargo to be rounded-up to a whole cargo;	
Article 2, first paragraph, point (16b)				
67b			(16b) ‘fractional quantities’ means volumes of natural gas carried forward to following contract years if the quantity delivered during a year is more or less than the adjusted annual contracted quantity after adjustments; these volumes can be both positive and negative;	
Article 2, first paragraph, point (16c)				
67c			(16c) ‘upward quantities’ means volumes of natural gas to be added optionally to the annual contracted quantity based on supply contracts at the discretion of a contract party;	
Article 2, first paragraph, point (17)				

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68	(17) ‘make-up quantities’ mean the volumes of natural gas which a purchaser or the importer is entitled or obligated to take delivery of and pay for in subsequent periods, in compliance with minimum take-or-pay requirements and in order to compensate for any shortfall in the quantities contracted but not taken in prior periods, as provided for in a long-term supply contract;	(17) ‘make-up quantities’ mean the volumes of natural gas which a purchaser or the importer is entitled or obligated to take delivery of and pay for in subsequent periods, in compliance with minimum take-or-pay requirements and in order to compensate for any shortfall in the quantities contracted but not taken in prior periods, as provided for in a long-term supply contract;	(17) ‘ <b>paid</b> make-up quantities’ mean the volumes of natural gas which a <del>purchaser or the importer</del> <b>buyer</b> is entitled or obligated to take delivery of and pay for in subsequent periods, in compliance with minimum take-or-pay requirements and in order to compensate for any shortfall in the quantities contracted but not taken in prior periods, as provided for in a long-term supply contract;	
Article 2, first paragraph, point (18)				
69	(18) ‘delivery schedule’ means the timetable or plan agreed between the parties to a gas supply contract, specifying the quantities of gas to be delivered by the seller or the exporter and received by the buyer or the importer over defined time intervals, including the timing, location, and conditions of delivery, as set forth in a supply contract or any related operational procedures;	(18) ‘delivery schedule’ means the timetable or plan agreed between the parties to a gas supply contract, specifying the quantities of gas to be delivered by the seller or the exporter and received by the buyer or the importer over defined time intervals, including the timing, location, and conditions of delivery, as set forth in a supply contract or any related operational procedures;	(18) ‘delivery schedule’ means the timetable or plan agreed between the parties to a gas supply contract, specifying the quantities of gas to be delivered by <del>the</del> <b>thea</b> seller <del>or the exporter</del> and received by <del>thea</del> <b>thea</b> buyer <del>or the importer</del> over defined time intervals, including the timing, location, and conditions of delivery, as set <del>forth</del> <b>forthout</b> in a supply contract or any related operational procedures;	
Article 2, first paragraph, point (19)				
70	(19) ‘nomination’ means a nomination as defined in Article 2, point (8), of Regulation (EU)	(19) ‘nomination’ means a nomination as defined in Article 2, point (8), of Regulation (EU)	(19) ‘nomination’ means a nomination as defined in Article 2, point (8), of Regulation (EU)	

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	<p>2024/1789 of the European Parliament and of the Council<sup>1</sup>;</p> <p>1. Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009 (OJ L, 2024/1789, 15.7.2024, ELI: <a href="http://data.europa.eu/eli/reg/2024/1789/oj">http://data.europa.eu/eli/reg/2024/1789/oj</a>) ; ENTSO, Security of Supply Simulation   ENTSO.</p>	<p>2024/1789 of the European Parliament and of the Council<sup>1</sup>;</p> <p>1. Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009 (OJ L, 2024/1789, 15.7.2024, ELI: <a href="http://data.europa.eu/eli/reg/2024/1789/oj">http://data.europa.eu/eli/reg/2024/1789/oj</a>) ; ENTSO, Security of Supply Simulation   ENTSO.</p>	<p>2024/1789 of the European Parliament and of the Council<sup>1</sup>;</p> <p>1. Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009 (OJ L, 2024/1789, 15.7.2024, ELI: <a href="http://data.europa.eu/eli/reg/2024/1789/oj">http://data.europa.eu/eli/reg/2024/1789/oj</a>) ; ENTSO, Security of Supply Simulation   ENTSO.</p>	
Article 2, first paragraph, point (20)				
71	(20) ‘oil’ means crude oil, natural gas liquids, refinery feedstocks, additives and oxygenates and other hydrocarbons and oil products falling under CN codes 2709 and 2710.	(20) ‘oil’ means crude oil, natural gas liquids, refinery feedstocks, additives and oxygenates and other hydrocarbons and oil products falling under CN codes 2709 and 2710.	(20) ‘oil’ means crude oil, natural gas liquids <del>liquids</del> <b>condensates</b> , refinery feedstocks, additives and oxygenates, and other hydrocarbons and oil products falling under CN codes 2709 and 2710.	
Article 2, first paragraph, point (20a)				
71a		<i><u>(20a) ‘import’ means the placing of goods under release for free circulation, as referred to in Article 201 of Regulation (EU) No 952/2013 of the European Parliament and of the Council;</u></i>		
Article 2, first paragraph, point (20b)				

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71b		<p><u>(20b) 'temporary storage' means temporary storage as defined in Article 5, point (17) of Regulation (EU) No 952/2013 of the European Parliament and of the Council</u>;</p> <p><u>1. Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code (OJ L 269, 10.10.2013, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/2013/952/oj">http://data.europa.eu/eli/reg/2013/952/oj</a>)</u></p>		
Article 2, first paragraph, point (20c)				
71c		<p><u>(20c) 'country of production' means the country where the natural gas is extracted; in cases where the natural gas is extracted in one country, but liquified or re-gasified in another country, the country of production is considered to be the country of extraction;</u></p>		
Article 2, first paragraph, point (20d)				
71d		<p><u>(20d) 'natural gas undertakings' means natural gas undertakings as defined in Article 2 point 15 of Directive (EU) 2024/1788 of the European Parliament and of the Council;</u></p>		We do not support the amendment of Art. 7(1) and respectively - a definition of "natural gas undertaking" to be included in the text.
Article 2, first paragraph, point (20e)				

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
71e		<u>(20e) 'pipeline operator' means a natural or legal person responsible for planning, organising, supervising or conducting activities associated with the operation of the pipeline;</u>		
Article 2, first paragraph, point (20f)				
71f		<u>(20f) 'significant influence' means significant influence as defined in Article 1 point (5) of Commission Delegated Regulation (EU) 2022/676<sup>1</sup>.</u>  <u>1. Commission Delegated Regulation (EU) 2022/676 of 3 December 2021 supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to regulatory technical standards specifying the conditions in accordance with which consolidation is to be carried out in the cases referred to in Article 18(3) to (6) and Article 18(8) of that Regulation (OJ L 123, 26.4.2022, p. 1, ELI: <a href="http://data.europa.eu/eli/reg_del/2022/676/oj">http://data.europa.eu/eli/reg_del/2022/676/oj</a>).</u>		
CHAPTER II				
72	CHAPTER II STEPWISE BAN OF NATURAL GAS IMPORTS FROM THE RUSSIAN FEDERATION	CHAPTER II STEPWISE BAN OF NATURAL GAS IMPORTS FROM THE RUSSIAN FEDERATION	CHAPTER II STEPWISE BAN PROHIBITION OF NATURAL GAS IMPORTS FROM THE RUSSIAN FEDERATION	
Article 3				

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
73	Article 3 Prohibition of natural gas imports from the Russian Federation	Article 3 Prohibition of natural gas imports from the Russian Federation	Article 3 Prohibition of natural gas imports from the Russian Federation	
Article 3(1)				
74	1. The import of natural gas in gaseous state via pipelines, which originates in or is exported directly or indirectly from the Russian Federation, shall be prohibited as of 1 January 2026 unless one of the exceptions in Article 4 applies.	1. The import of natural gas in gaseous state via pipelines, which originates in or is exported directly or indirectly from the Russian Federation, <u>and temporary storage of such gas</u> shall be prohibited as of 1 January 2026 unless one of the exceptions in Article 4 applies.	1. The import of natural gas in gaseous state via pipelines, which originates in or is exported, directly or indirectly, from the Russian Federation, shall be prohibited as of 1 January 2026 unless one of the <del>exceptions</del> <b>exemptions provided for</b> in Article 4 applies.	
Article 3(2)				
75	2. The import of LNG, which originates in or is exported directly or indirectly from the Russian Federation, shall be prohibited as of 1 January 2026, unless one of the exceptions in Article 4 applies.	2. The import <u>and the temporary storage</u> of LNG, which originates in or is exported directly or indirectly from the Russian Federation, shall be prohibited as of 1 January 2026, unless one of the exceptions in Article 4 applies.	2. The import of LNG, which originates in or is exported, directly or indirectly, <b>from the Russian Federation, or which is obtained from natural gas in gaseous state extracted in from</b> the Russian Federation, shall be prohibited as of 1 January 2026, unless one of the <del>exceptions</del> <b>exemptions provided for</b> in Article 4 applies. <b>This prohibition shall also apply to LNG which originates in or is exported, directly or indirectly, from the Russian Federation contained in mixtures.</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
				<p>We insist on the addition of the following provision:</p> <p><b><u>Art. 3.(3). The Commission shall be liable for any loss, damage or penalty claimed against a Member State or against companies registered in a Member State resulting from the implementation of this Regulation, even if this Regulation is subsequently repealed or declared to be in conflict with EU law.</u></b></p> <p>Further necessary safeguard should be introduced in the text in order to protect companies with transmission and reserved capacity long-term contracts from potential arbitration cases and financial penalties.</p>
Article 4				
76	Article 4 Transition phase for existing supply contracts	Article 4 Transition phase for existing supply contracts	Article 4 Transition phase for existing supply contracts	With regard to the transitional period proposed in Article 4 for existing contracts, given the need to adapt to the new requirements of the Regulation, we consider it necessary to provide achievable deadlines. In this regard, we consider the proposed initial

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
				approach to be balanced, which is why we did not comment on it during the negotiations until now. In view of the need to adapt to the new provisions, increasing the ambition and reducing the proposed deadlines would not be feasible or acceptable to us.
Article 4(1)				
77	1. Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a short-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 17 June 2026.	1. Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a short-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 17 June 2026.	1. <b>Article 3 shall apply as of 17 June 2026</b> , where <del>the importer can demonstrate to customs</del> <b>it can be demonstrated to the authorising</b> authorities that imports of natural gas referred to in Article 3 are executed under a short-term supply contract, concluded before 17 June 2025, and not amended thereafter, <del>Article 3 shall apply as of 17 June 2026.</del> <b>unless the amendment is covered by paragraph 4.</b>	
Article 4(2)				
78	2. Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are:	2. <del>Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are:</del> <b>deleted</b>	2. <b>Article 3 shall apply as of 1 January 2028</b> , where <del>the importer can demonstrate to customs</del> <b>it can be demonstrated to the authorising</b> authorities <del>that imports of natural gas referred to in Article 3 are:</del>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VSEEC Council Mandate	VS.EC Draft Agreement
Article 4(2), point (a)				
79	(a) executed under a short-term supply contract with delivery to an interconnection point with a landlocked country and,	(a) <del>executed under a short-term supply contract with delivery to an interconnection point with a landlocked country and,</del> <u>deleted</u>	(a) <b>that imports of natural gas referred to in Article 3 are</b> executed under a short-term supply contract with delivery to an interconnection point with a landlocked country <b>which is necessary to fulfil the long-term supply contract under point (b), and, and,</b>	
Article 4(2), point (b)				
80	(b) that a long-term supply contract with delivery at the virtual trading point of that landlocked country for the import of natural gas in gaseous state via pipelines exists, which originates in or is exported directly or indirectly from the Russian Federation, and which was concluded before 17 June 2025 and not amended thereafter, Article 3 shall apply as of 1 January 2028.	(b) <del>that a long-term supply contract with delivery at the virtual trading point of that landlocked country for the import of natural gas in gaseous state via pipelines exists, which originates in or is exported directly or indirectly from the Russian Federation, and which was concluded before 17 June 2025 and not amended thereafter, Article 3 shall apply as of 1 January 2028.</del> <u>deleted</u>	(b) that a long-term supply contract with delivery at the virtual trading point of <del>that</del> to a landlocked country for the import of natural gas in gaseous state via pipelines exists, which originates in or is exported directly or indirectly from the Russian Federation, and which was concluded before 17 June 2025 and not amended thereafter, Article 3 shall apply as of 1 January 2028.:	
Article 4(2), point (ba)				
80a			(i) <b>which originates in or is exported, directly or indirectly, from the Russian Federation,</b>	
Article 4(2), point (bb)				

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
80b			(ii) for which the delivery at the original delivery point at an EU border with a third country can no longer be executed, and	
Article 4(2), point (bc)				
80c			(iii) which was concluded before 17 June 2025 and not amended thereafter, unless the amendment is covered by paragraph 4.	
Article 4(3)				
81	3. Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a long-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 1 January 2028.	3. Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a long-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 1 January <del>2028</del> <u>2027</u> .	3. <b>Article 3 shall apply as of 1 January 2028</b> , where <del>the importer can demonstrate to customs</del> <b>it can be demonstrated to the authorising</b> authorities that imports of natural gas referred to in Article 3 are executed under a long-term supply contract concluded before 17 June 2025, and not amended thereafter, <del>Article 3 shall apply as of 1 January 2028 unless the amendment is covered by</del> <b>paragraph 4.</b>	Setting 1 January 2027 as the end date for Russian gas imports appears too ambitious given the current state of infrastructure and market readiness. We prefer the deadline proposed in the GA.
Article 4(3a)				
81a			3a. The exemptions provided for in paragraphs 1 to 3 shall also apply with regard to	

	<b>CLEAN</b> <b>Commission Proposal</b>	<b>VS.EC</b> <b>EP Mandate</b>	<b>VS.EC</b> <b>Council Mandate</b>	<b>VS.EC</b> <b>Draft Agreement</b>
			<b>existing supply contracts with the following amendments:</b>	
Article 4(3b)				
81b			<b>(a) lowering contracted quantities;</b>	
Article 4(3c)				
81c			<b>(b) lowering prices and fees;</b>	
Article 4(3d)				
81d			<b>(c) amending confidentiality clauses;</b>	
Article 4(3e)				
81e			<b>(d) amending operational procedures, such as communication procedures;</b>	
Article 4(3f)				
81f			<b>(e) changes of addresses of contract parties;</b>	
Article 4(3g)				
81g			<b>(f) transfers of contractual obligations between affiliated undertakings;</b>	
Article 4(3h)				
81h			<b>(g) changes required by judicial or arbitration procedures; or</b>	
Article 4(3i)				

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
81i			(h) for landlocked countries, changes between national delivery points.	
Article 4(4)				
82	4. The quantities of imports made in accordance with paragraphs 1 and 2 shall not exceed the contracted quantities.	4. The quantities of imports made in accordance with paragraphs 1 and <del>2</del> 3 shall not exceed the contracted quantities.	4. The quantities of imports made in accordance with paragraphs 1, <b>2 and 3</b> and <del>2</del> shall not exceed the contracted quantities.	
Article 5				
83	Article 5 Prohibition to provide LNG long-term terminal services to Russian customers	Article 5 Prohibition to provide LNG long-term terminal services to Russian customers	Article 5 <del>Prohibition to provide LNG long-term terminal services to Russian customers</del>	
Article 5, first paragraph				
84	The provision of long-term LNG terminal services in the EU to entities established in the Russian Federation or entities controlled by natural persons or legal entities established in the Russian Federation shall be prohibited as of 1 January 2026.	The provision of long-term LNG terminal services in the <del>EU</del> Union to entities established in the Russian Federation or <del>to</del> entities <u>owned or controlled, directly or indirectly via various frameworks, such as intermediate structures or subsidiaries,</u> by natural persons or legal entities established in the Russian Federation <u>or under significant influence of the Russian Federation</u> shall be prohibited as of 1 January 2026.	The provision of long-term LNG terminal services in the EU to <del>entities established in the Russian Federation or entities controlled by</del> natural persons or legal entities established in the Russian Federation shall be prohibited as of 1 January 2026. <del>deleted</del>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VSEEC Council Mandate	VS.EC Draft Agreement
Article 6				
85	Article 6 Transition phase for LNG terminal services under existing contracts	Article 6 Transition phase for LNG terminal services under existing contracts	Article 6 <del>Transition phase for LNG terminal services under existing contracts</del> <b>deleted</b>	
Article 6, first paragraph				
86	Where the provider of long-term LNG terminal services can demonstrate to customs authorities that those services are provided under a contract concluded before 17 June 2025 and not amended thereafter, Article 5 shall apply as of 1 January 2028.	Where the provider of long-term LNG terminal services <u>referred to in Article 5</u> can demonstrate to customs authorities that those services are provided under a contract concluded before 17 June 2025 and not amended thereafter, Article 5 shall apply as of 1 January <del>2028</del> <u>2027</u> .	<del>Where the provider of long-term LNG terminal services can demonstrate to customs authorities that those services are provided under a contract concluded before 17 June 2025 and not amended thereafter, Article 5 shall apply as of 1 January 2028.</del> <b>deleted</b>	
Chapter IIa				
86a		<u><i>Chapter II a</i></u> <u><i>BAN OF OIL IMPORTS FROM THE RUSSIAN FEDERATION</i></u>		
Article 6a				
86b		<u><i>Article 6a</i></u> <u><i>Prohibition of oil imports, including petroleum product imports, from the Russian Federation</i></u>		Bulgaria does not support the proposed by the EP extension of the scope of the REPowerEU Regulation. It could create unintended risks for the functioning of the internal market.
Article 6a(1)				
86c		<u><i>1. The import and temporary storage of oil,</i></u>		

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		<u>including petroleum products, which originate in or are exported directly or indirectly from the Russian Federation as well as of petroleum products obtained in a third country from crude oil originating in the Russian Federation, shall be prohibited as of 1 January 2026.</u>		
Article 6b				
86d		<u>Article 6b Submission and verification of relevant information</u>		
Article 6b(1)				
86e		<u>1. Importers of the products referred to in Article 6a shall provide customs authorities with relevant information and evidence necessary to implement that Article.</u>		
Article 6b(2), first subparagraph				
86f		<u>2. The information and evidence referred to in paragraph 1 shall allow the customs authorities to establish:</u>		
Article 6b(2), first subparagraph, point (a)				
86g		<u>(a) in the case of crude oil: the country of origin of that oil;</u>		
Article 6b(2), first subparagraph, point (b)				

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86h		<u>(b) in the case of petroleum products: the country of origin of the product or, where the product is imported from a third country, the country of origin of the crude oil on the basis of which the product was obtained.</u>		
Article 6b(2), second subparagraph				
86i		<u>By means of an implementing act, the Commission shall, by no later than 5 days after entry into force of this Regulation, determine the minimum standards for such evidence, including the type, format and authentication requirements, in order to ensure uniform application across Member States.</u>		
Article 6b(2), third subparagraph				
86j		<u>In case where customs authorities consider that the evidence provided in relation to a good as referred to in Article 6a is not conclusive, they shall refuse the release for free circulation or the temporary storage of that good.</u>		
Article 6b(3), first subparagraph				
86k		<u>3. Operators of oil pipelines transporting crude oil into the</u>		

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		<u><i>territory of the Union shall analyse and verify the geographic origin of all oil volumes entering the Union at border entry points.</i></u>		
Article 6b(3), second subparagraph				
86l		<u><i>Pipeline operators shall submit, on a quarterly basis, the following to the competent national authority of the Member State where the entry point is located:</i></u>		
Article 6b(3), second subparagraph, point (a)				
86m		<u><i>(a) a summary report of origin certifications for all imported oil volumes;</i></u>		
Article 6b(3), second subparagraph, point (b)				
86n		<u><i>(b) copies of all corresponding countries of origin;</i></u>		
Article 6b(3), second subparagraph, point (c)				
86o		<u><i>(c) notification of any discrepancies or suspected falsifications.</i></u>		
Article 6b(3), third subparagraph				
86p		<u><i>Competent authorities of the Member States shall have the right to conduct on-site inspections and audits of pipeline</i></u>		


	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<u>entry points, to request full documentation relating to the origin of imported oil and to require enforcement measures in cases of non-compliance.</u>		
Article 6b(3), fourth subparagraph				
86q		<u>Pipeline operators shall retain all records and origin certifications for a minimum of five years and make them available for inspection upon request.</u>		
CHAPTER III				
87	CHAPTER III SUBMISSION AND EXCHANGE OF RELEVANT INFORMATION	CHAPTER III SUBMISSION AND EXCHANGE OF RELEVANT INFORMATION	CHAPTER III <b>AUTHORISATION,</b> SUBMISSION AND EXCHANGE OF RELEVANT INFORMATION	
Article 7				
88	Article 7 Submission of relevant information by importers	Article 7 Submission of relevant information <i>by importers</i>	Article 7 <b>Authorisation and</b> submission of relevant information by importers	
Article 7(1), first subparagraph				
89	1. Importers of natural gas shall provide customs authorities with all relevant information necessary to implement Articles 3 and 4, in particular appropriate evidence to verify whether the natural gas originates in or is	1. Importers of natural gas, <u>and/or natural gas undertakings where appropriate,</u> shall provide customs authorities with all relevant information necessary to implement Articles 3 and 4, in particular appropriate evidence.	1. <del>Importers of natural gas shall provide customs authorities with all relevant information necessary to implement Articles 3 and 4, in particular appropriate evidence to verify whether the natural gas originates in or is</del>	The inclusion of the “natural gas undertaking” in the text is not clear. The importers are the obliged persons according to the custom legislation and this Regulations. The text leads to legal uncertainty.

	CLEAN Commission Proposal	VS.EC EP Mandate	VSEEC Council Mandate	VS.EC Draft Agreement
	exported directly or indirectly from the Russian Federation.	<u><i>such as evidence of independent verification of the country of production, which may include upstream delivery documentation and satellite tracking of LNG tankers</i></u> to verify whether the natural gas originates in or is exported directly or indirectly from the Russian Federation.	exported directly or indirectly from the Russian Federation. <del>deleted</del>	
Article 7(1), second subparagraph				
90	For the purposes of application of Article 4, importers of natural gas shall provide customs authorities and other authorities involved in the monitoring pursuant to Article 9 and 10, with appropriate evidence to assess whether the conditions set out in that Article are met.	For the purposes of application of Article 4, importers of natural gas shall provide customs authorities and other authorities involved in the monitoring pursuant to Article 9 and 10, with appropriate evidence to assess whether the conditions set out in <del>that</del> Article 4 are met.	<b>Where an exemption is requested for imports</b> <del>For the purposes of application of Article 4, importers of natural gas shall provide customs authorities and other authorities involved in the monitoring</del> <b>which originates in or is exported, directly or indirectly, from the Russian Federation</b> pursuant to Article 9 and 10, with appropriate evidence <del>4, imports shall be subject to prior authorisation. Authorising authorities shall be provided with all information necessary</del> to assess whether the conditions set out in <del>that</del> Article 4 are met.	
Article 7(2)				

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
91	2. The information referred to in paragraph 1 shall include at least all of the following:	2. <del>The information referred to in paragraph 1</del> <u>Where natural gas, which originates in or is exported directly or indirectly from the Russian Federation, is imported or temporarily stored pursuant to Article 4, that import or temporary storage shall include be subject to prior authorisation from customs authorities. Importers shall provide to the customs authorities, no later than one month before the planned date of import or temporary storage,</u> at least <del>all of</del> the following <u>information:</u>	2. <del>The</del> <u>That</u> information referred to in paragraph 1 shall include at least all of the following:	We support the Council's proposal for 5 working days for prior authorisation for non-Russian gas. As we have already commented in the course of the discussions so far, a longer period (30 days) would make it more difficult to implement in case of short-term products even for non-Russian gas.
Article 7(2), point (a)				
92	(a) the date of the conclusion of the gas supply contract;	(a) the date of the conclusion of the gas supply contract;	(a) the date of the conclusion of the gas supply contract;	
Article 7(2), point (b)				
93	(b) the duration of the gas supply contract;	(b) the duration of the gas supply contract;	(b) the duration of the gas supply contract;	
Article 7(2), point (c)				
94	(c) the contracted gas quantities, including all upward or downward flexibility rights;	(c) the contracted gas quantities, including all upward or downward flexibility rights;	(c) the contracted <del>gas</del> quantities, including all upward or downward flexibility rights;	
Article 7(2), point (d)				

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
95	(d) the identity of the parties to the gas supply contract, including, for parties registered in the EU, the Economic Operator Registration and Identification (EORI) number;	(d) the identity of the parties to the gas supply contract, including, for parties registered in the EU, the Economic Operator Registration and Identification (EORI) number;	(d) the identity of the parties to the gas supply contract, including, for parties registered in the EU, the Economic Operator Registration and Identification (EORI) number;	
Article 7(2), point (e)				
96	(e) the producer of the gas and the country of production, and, as appropriate, the country where the gas was further processed;	(e) the producer of the gas and the country of production, and, as appropriate, the country where the gas was further processed;	(e) <del>the producer of the gas and the country of production, and, as appropriate, the country where the gas was further processed;</del> <b>deleted</b>	
Article 7(2), point (ea)				
96a			<b>(ea) in the case of LNG mixtures, documentation proving the respective quantities of Russian and non-Russian gas in the mixture and establishing the mixing process;</b>	
Article 7(2), point (f)				
97	(f) for LNG imports, the port of first loading;	(f) for LNG imports, <u>the place of liquefaction and</u> the port of first loading, <u>as well as all the evidence needed to prevent flag of convenience and shadow fleets</u> ;	(f) for LNG imports, <b>the place of liquefaction and</b> the port of first loading;	
Article 7(2), point (g)				
98	(g) the delivery points, including possible flexibilities concerning the delivery point.	(g) the delivery points, including possible flexibilities concerning the delivery point.	(g) the delivery points, including possible flexibilities	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			concerning the delivery point; <b>and</b>	
Article 7(2), point (h)				
99	(h) any modification of the gas supply contract, indicating content and date of the modification, with the exception of modifications which relate solely to the gas price;	(h) any modification of the gas supply contract, indicating content and date of the modification, with the exception of modifications which relate solely to the gas price;	(h) any <del>modification</del> <b>amendment</b> of the gas supply contract, indicating <b>the</b> content and <b>the</b> date of the <del>modification</del> <b>amendment</b> , with the exception of <del>modifications</del> <b>amendments</b> which relate solely to the gas price;.	
Article 7(2a)				
99a			<b>Where an exemption under Article 4 is requested and the price of the gas was amended on 17 June 2025 or later, information on the price amendment shall be provided.</b>	
Article 7(2a)				
99b		<u><i>2a. Imports of natural gas produced in countries other than the Russian Federation shall be subject to prior authorisation, except in the cases set out in paragraph 2b. Importers shall provide the customs authorities and other authorities in the Member State where the gas is to be imported or temporarily stored, no later than one month before</i></u>		The proposed procedure in 2a leads to unproportional administrative burden.

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<p><u>the planned date of import or temporary storage, with unambiguous evidence to establish the country of production of the natural gas. In order to ensure uniform application of paragraph 1 across Member States, the Commission shall, by ... [5 days after entry into force of this Regulation], adopt implementing acts determining the minimum standards for evidence referred to in that paragraph, including the type, format and authentication requirements. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 15a(2). On duly justified imperative grounds of urgency relating to significant risks for trade and security stemming from possible circumvention of this Regulation, the Commission shall adopt immediately applicable implementing acts in accordance with the procedure referred to in Article 15a(3). Member States shall cooperate with one another and with the</u></p>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<p><u>Commission in the assessment of applications for prior authorisation. Where there are indications of falsification, fraud or circumvention, OLAF, in line with its mandate, shall provide support to the customs and other competent authorities.</u></p> <p><u>Information on authorisations granted, refused or revoked shall be transmitted without delay to the Commission and shared within the Gas Coordination Group, in order to enhance transparency and assist Member States in preventing circumvention, minimising risk and combating fraud.</u></p> <p><u>On its own initiative, or following a notification from a Member State, the Commission may request additional information from the customs authorities for the purpose of ensuring a uniform application of the criteria used for the authorisation procedure.</u></p>		
Article 7(2b)				
99c			The required information shall be submitted to the authorising authority no	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			later than one month before the entry into the customs territory.	
Article 7(2b)				
99d		<p><u>2b. No prior authorisation shall be required where the gas is imported from a gas-producing country which prohibits the import of natural gas produced in the Russian Federation. In order to facilitate the application of paragraph 1 across Member States, the Commission shall, by ... [5 days after entry into force of this Regulation], adopt implementing acts setting out the list of countries which prohibit the import of natural gas produced in the Russian Federation. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 15a(2). The Commission shall review that list every three months and, where appropriate, amend it.</u></p> <p><u>On duly justified imperative grounds of urgency relating to significant risks for trade and security stemming from possible circumvention of this Regulation,</u></p>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<u><i>the Commission shall adopt immediately applicable implementing acts in accordance with the procedure referred to in Article 15a(3).</i></u>		
Article 7(2c)				
99e			<b>2a. Imports of natural gas where the country of production is not the Russian Federation shall be subject to prior authorisation, except in case those imports fall under paragraph 3. The authorising authorities in the Member State where the gas is to be released for free circulation shall be provided with evidence establishing the country of production of that natural gas, no later than 5 working days before its entry into the customs territory.</b>	
Article 7(2d)				
99f			<b>2b. No prior authorisation is required where gas is imported from a country which produces gas and has exported more than 5 bcm of natural gas to the Union in 2024 and has either prohibited the import of Russian</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			gas or is applying other restrictive measures concerning Russian gas, or has no gas infrastructure in place which allows to import LNG or pipeline gas. No later than 5 days after entry into force of this Regulation, the Commission shall, by means of an implementing decision, draw up the list of such countries and update it as necessary. The report pursuant to Article 15(1) shall include an assessment of the effectiveness of the prior authorisation process pursuant to Article 7(2).	
Article 7(3)				
100	3. Customs authorities or other authorities involved in the monitoring pursuant to Article 9 and 10, may request more detailed information, except price information, if the required information is necessary to assess whether the conditions set out in Article 3 and 4 are fulfilled. Customs authorities may, in particular, require importers to submit the text of certain	3. Customs authorities or other authorities involved in the monitoring pursuant to Article 9 and 10, may request more detailed information, except price information, if the required information is necessary to assess whether the conditions set out in Article 3 and 4 are fulfilled. Customs authorities may, in particular, require importers to submit the text of certain	3. <b>Authorising authorities</b> , customs authorities, <b>where they are not identical</b> or other authorities involved in the monitoring pursuant to <del>Article 9 and 10</del> <b>referred to in Article 9 and 10</b> , may request more detailed information, <del>except price information, if the required</del> <b>if that information is deemed</b> necessary to assess whether the conditions set out in <del>Article</del> <b>Articles 3 and 4 are</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	provisions of the gas supply contract in full or the text of entire gas supply contract, except price information, especially where certain contractual provisions are interrelated, or where the full knowledge of the formulation of the contractual provisions is crucial for the assessment. In case customs authorities consider that the evidence provided is not conclusive, they may refuse the release for free circulation of the goods.	provisions of the gas supply contract in full or the text of entire gas supply contract, except price information, especially where certain contractual provisions are interrelated, or where the full knowledge of the formulation of the contractual provisions is crucial for the assessment. In <i>ease</i> <b>cases where the</b> customs authorities consider that the evidence provided is not conclusive, they <i>may</i> <b>shall</b> refuse the release for free circulation <b>or</b> <b><u>the temporary storage</u></b> of the goods.	fulfilled. Customs <del>They may also</del> <b>rely on information from other sources. Authorising</b> authorities may, in particular, require <del>importers to submit</del> <b>submitting</b> the text of certain provisions of the gas supply contract in full or the <del>entire</del> <b>entire</b> text of <del>entire</del> the gas supply contract, except price information, <del>especially</del> <b>in particular</b> where certain contractual provisions are interrelated, or where the full knowledge of the formulation of the contractual provisions is crucial for <del>the</del> <b>that</b> assessment. <del>In ease</del> <b>Where the</b> <del>customs authorities consider that the evidence</del> <b>information</b> provided is not conclusive, <del>they</del> <b>the customs authorities</b> may refuse the release for free circulation of the goods.	
Article 7(4)				
101	4. Natural gas entering to the Union through the following interconnection points shall be presumed to be exported directly or indirectly from the Russian Federation, unless the importer can provide unambiguous evidence to customs authorities that the imported natural gas	4. Natural gas entering <del>to</del> the Union through the following interconnection points shall be presumed to be exported directly or indirectly from the Russian Federation, <del>unless the importer can provide unambiguous evidence to customs authorities that the imported natural gas</del>	4. Natural gas <del>entering to be imported into</del> the Union through <del>the following</del> <b>borders or via interconnectors or interconnection points between the Union and the Russian Federation or Belarus, or via the interconnection point Strandzha 2 / Malkoclar (TurkStream)</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	originates in a country other than the Russian Federation that has been in transit through the Russian Federation.	<del>originates in a country other than the Russian Federation that has been in transit through the Russian Federation.</del>	shall be presumed to be exported, directly or indirectly, from the Russian Federation, unless the importer can provide unambiguous evidence <b>can be provided to the authorising to customs authorities no later than 1 month before the entry into the customs territory establishing</b> that the imported natural gas originates in a country other than the Russian Federation that has been in transit through the Russian Federation.:	
Article 7(4), point (-a)				
101a			<b>(-a) has been in transit through the Russian Federation; and</b>	
Article 7(4), point (-b)				
101b			<b>(-b) that the country of production is not the Russian Federation.</b>	Taking into account the general obligation of all gas importers to prove the non-Russian origin of the imported gas, this para is irrelevant, regardless of whether IPs or EU borders are specified.
Article 7(4), point (a)				
102	(a) Imatra (FI/RU);	(a) Imatra (FI/RU);	(a) <del>Imatra (FI/RU);</del> <b>deleted</b>	
Article 7(4), point (b)				
103	(b) Narva (EE/RU);	(b) Narva (EE/RU);	(b) <del>Narva (EE/RU);</del> <b>deleted</b>	
Article 7(4), point (c)				

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104	(c) Värška (EE/RU);	(c) Värška (EE/RU);	(c) <del>Värška (EE/RU);</del> <b>deleted</b>	
Article 7(4), point (d)				
105	(d) Luhamaa (LV/RU);	(d) Luhamaa <del>(LV/RU)</del> <u>(EE/RU)</u> ;	(d) <del>Luhamaa (LV/RU);</del> <b>deleted</b>	
Article 7(4), point (e)				
106	(e) Šakiai (LT/RU);	(e) Šakiai (LT/RU);	(e) <del>Šakiai (LT/RU);</del> <b>deleted</b>	
Article 7(4), point (f)				
107	(f) Kotlovka (LT/BY);	(f) Kotlovka (LT/BY);	(f) <del>Kotlovka (LT/BY);</del> <b>deleted</b>	
Article 7(4), point (g)				
108	(g) Kondratki (PL/BY);	(g) Kondratki (PL/BY);	(g) <del>Kondratki (PL/BY);</del> <b>deleted</b>	
Article 7(4), point (h)				
109	(h) Wysokoje (PL/BY);	(h) Wysokoje (PL/BY);	(h) <del>Wysokoje (PL/BY);</del> <b>deleted</b>	
Article 7(4), point (i)				
110	(i) Tietierowka (PL/BY);	(i) Tietierowka (PL/BY);	(i) <del>Tietierowka (PL/BY);</del> <b>deleted</b>	
Article 7(4), point (j)				
111	(j) Kobryń (PL/BY);	(j) Kobryń (PL/BY);	(j) <del>Kobryń (PL/BY);</del> <b>deleted</b>	
Article 7(4), point (k)				
112	(k) Greifswald (DE/RU);	(k) Greifswald (DE/RU);	(k) <del>Greifswald (DE/RU);</del> <b>deleted</b>	
Article 7(4), point (ka)				

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
112a		<a href="#"><u>(ka) Strandzha 1 (BG) - Malkoclar (TR)</u></a>		Non-Russian gas is transported through the Strandzha 1/Malkoclar entry point.
Article 7(4), point (l)				
113	(l) Strandzha 2 (BG)/Malkoclar (TR) – TurkStream	(l) Strandzha 2 (BG)/Malkoclar (TR) – TurkStream	(l) Strandzha 2 (BG)/Malkoclar (TR) – TurkStream <del>deleted</del>	
Article 7(4), point (m)				
114	(m) Kiskundorozsma-2 (HU) / Horgos (RS)	(m) Kiskundorozsma-2 (HU) / Horgos (RS)	(m) <del>Kiskundorozsma-2 (HU) / Horgos (RS)</del> <del>deleted</del>	
Article 7(4), point (n)				
115	(n) Kiskundorozsma (HU/RS)	(n) Kiskundorozsma (HU/RS)	(n) <del>Kiskundorozsma (HU/RS)</del> <del>deleted</del>	
Article 7(4), point (o)				
116	(o) Kireevo (BG) / Zaychar (RS)	(o) Kireevo (BG) / Zaychar (RS)	(o) <del>Kireevo (BG) / Zaychar (RS)</del> <del>deleted</del>	
Article 7(4), point (p)				
117	(p) Kalotina (BG)/ Dimitrovgrad (RS)	(p) Kalotina (BG)/ Dimitrovgrad (RS)	(p) <del>Kalotina (BG)/ Dimitrovgrad (RS)</del> <del>deleted</del>	
Article 7(4), point (pa)				
117a			<b>5. Where natural gas is transported through the EU from third country to third country under a transit procedure under the Union Customs Code, the authorising and customs authorities, where</b>	

	<b>CLEAN</b> <b>Commission Proposal</b>	<b>VS.EC</b> <b>EP Mandate</b>	<b>VS.EC</b> <b>Council Mandate</b>	<b>VS.EC</b> <b>Draft Agreement</b>
			<b>they are not identical, shall be informed no later than one month before the planned transit about:</b>	
Article 7(4), point (pb)				
117b			<b>(a) the country of production of the natural gas to be transiting, unless such information is not available;</b>	
Article 7(4), point (pc)				
117c			<b>(b) the planned or actual nomination schedules specifying volume, timing, and entry and exit points of the gas in transit, with daily granularity where applicable;</b>	
Article 7(4), point (pd)				
117d			<b>(c) volumes and delivery points in the gas supply contracts; and</b>	
Article 7(4), point (pe)				
117e			<b>(d) the contract between the seller or buyer or any intermediary entity and the relevant Transmission System Operators in the Union, where applicable.</b>	
Article 7(4), point (pf)				

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
117f			Authorising authorities shall verify the consistency of the data and share the information received with customs authorities, where they are not identical, without delay.	
Article 7(4a)				
117g		<u>4a. The Commission shall adopt delegated acts in accordance with Article 15b to amend the list of interconnection points set out in paragraph 4, where there is evidence that such revision and updating are necessary to ensure the effectiveness of the implementation of Articles 3 and 4.</u>		
Article 8				
118	Article 8 Submission of relevant information by providers of LNG terminal services	Article 8 Submission of relevant information by providers of LNG terminal services	Article 8 <del>Submission of relevant information by providers of LNG terminal services</del>	
Article 8, first paragraph				
119	Providers of LNG terminal services to customers established in the Russian Federation or controlled by natural persons or legal entities established in the Russian Federation shall provide	Providers of LNG terminal services to customers established in the Russian Federation or <u>owned or controlled directly or indirectly via various frameworks, such as intermediate</u>	<del>Providers of LNG terminal services to customers established in the Russian Federation or controlled by natural persons or legal entities established in the Russian Federation shall provide</del>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	customs authorities with relevant information for the implementation of Articles 5 and 6.	<u>structures or subsidiaries</u> , by natural persons or legal entities established in the Russian Federation <u>or under significant influence of the Russian Federation</u> , shall provide customs authorities with relevant information for the implementation of Articles 5 and 6.	<del>customs authorities with relevant information for the implementation of Articles 5 and 6.</del> <del>deleted</del>	
Article 9				
120	Article 9 Effective monitoring	Article 9 Effective monitoring	Article 9 Effective monitoring	We do not support the proposal. Increasing the scope of monitoring and reporting obligations only leads to an unnecessary increase in the administrative burden for the implementing authority.
Article 9, first paragraph				
121	Customs authorities, and, where relevant, competent authorities and regulatory authorities and the Agency for the Cooperation of Energy Regulators (ACER), shall ensure effective monitoring of the provisions in Chapter II, if necessary by making full use of their enforcement powers, and cooperate closely with relevant national authorities, authorities	Customs authorities, and, where relevant, competent authorities and regulatory authorities, <u>the European Anti-Fraud Office (OLAF), the European Public Prosecutor's Office (EPPO)</u> and the Agency for the Cooperation of Energy Regulators (ACER), shall ensure effective monitoring of the provisions in Chapter II <u>and [IIa], and when, if necessary by making, make</u> full use of their enforcement	<del>Customs</del> <b>Authorising</b> authorities, and, where relevant, <del>competent authorities and regulatory</del> <b>customs</b> authorities and the Agency for the Cooperation of Energy Regulators (ACER), shall ensure effective monitoring of the provisions in Chapter II, if necessary by making full use of their enforcement powers, and cooperate closely with relevant national authorities,	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>from other Member States, ACER or the Commission.</p>	<p>powers, and cooperate closely with <u>other</u> relevant national authorities, authorities from other Member States, <del>ACER</del> <del>or international authorities and</del> the Commission.</p> <p><u>The monitoring of Chapters II and IIa referred to in the first subparagraph shall include monitoring of any maritime transport practices in the territorial waters of Member States that may obscure the true origin of LNG or oil shipments and of the so called shadow fleets, including by requesting any relevant documentation, which could be employed to supply LNG or oil of Russian origin to the Union.</u></p> <p><u>Member States shall ensure that the customs authorities and other relevant authorities have adequate powers, functional independence and the capabilities to fulfil the obligations set out in this Regulation.</u></p> <p><u>Where the Commission has doubts as to the effectiveness of monitoring at the national level, it shall request the necessary</u></p>	<p>authorities from other Member States, ACER or the Commission.</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<u><i>information from the customs authorities.</i></u>		
Article 9, second paragraph				
121a		<u><i>2. The Commission shall continuously monitor the development of the Union's energy security of supply risks in relation to energy imports from the Russian Federation.</i></u>		
Article 9, third paragraph				
121b		<u><i>3. The Commission, in cooperation with the Member States, shall monitor the total volumes of natural gas imported through third countries, especially those suspected of enabling circumvention, regardless of the declared origin of the imported natural gas, in order to assess potential risks of circumvention of Articles 3 and 5. In addition, the Commission shall provide, within the framework of its annual State of the Energy Union report to the European Parliament and the Council, a dedicated annex on natural gas flows from the third countries, including an assessment of identified risks of circumvention,</i></u>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<u>as well as the implementation and effectiveness of framework for verifying the origin of oil, including petroleum products.</u>		
Article 9, fourth paragraph				
121c		<u>4. The Commission shall carry out a risk-based analysis of LNG terminals, in order to identify those for which there are reasonable grounds to suspect that there is a risk that the natural gas being imported is wholly or partially of Russian origin. Based on that analysis, the Commission shall, by three months after the entry into force of this Regulation, establish a list of such LNG terminals. That list shall be reviewed at least three months and, where necessary, updated. Where appropriate, the Commission shall propose measures, including legislative proposals, to mitigate those risks.</u>		
Article 9, fifth paragraph				
121d		<u>5. By 1 March 2026, the Commission shall analyse imports into the Union of petrochemical products falling under CN Code 39 obtained in</u>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<i><u>third countries from crude oil originating in Russia and assess their impact on the Union market. Where that analysis confirms market disruptions, the Commission shall take appropriate measures, which may include a legislative proposal.</u></i>		
Article 10				
122	Article 10 Exchange of information	Article 10 <i><u>Transparency and</u></i> exchange of information	Article 10 <b>Authorising authority, cooperation and</b> exchange of information	
Article 10, first paragraph -a				
122a			<b>1. The authorising authority is the customs authority, unless the Member State designates another authority for that purpose. Member States shall inform the Commission in the case that they designate another authority than the customs authority as authorising authority.</b>	
Article 10, first paragraph				
123	Customs authorities shall exchange the information received from natural gas importers with regulatory authorities, competent authorities, ACER and the	Customs authorities shall exchange the information received from natural gas importers with regulatory authorities, competent authorities, <i><u>OLAF, EPP0</u></i> , ACER	<b>2. <del>Customs</del> Authorising authorities shall cooperate and exchange the information received from imports of natural gas importers with regulatory</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	<p>Commission to the extent necessary to ensure effective assessment whether the conditions set out in Articles 3 to 6 of this Regulation are fulfilled. Customs authorities from different Member States shall exchange information received from natural gas importers to the extent necessary, and cooperate with each other in order to avoid circumvention. They shall make use of existing tools and databases allowing that relevant information can be effectively exchanged between national authorities in their Member State and authorities in other Member States, or put such tools in place where necessary.</p>	<p>and the Commission to the extent necessary to ensure effective assessment whether the conditions set out in Articles 3 to 6 of this Regulation are fulfilled. Customs authorities from different Member States shall exchange information received from natural gas importers to the extent necessary, and cooperate with each other in order to <u>ensure effective enforcement in accordance with the requirements of this Regulation and to</u> avoid circumvention. They shall make use of existing tools and databases allowing that relevant information can be effectively exchanged between national authorities in their Member State and authorities in other Member States, or put such tools in place where necessary.</p>	<p>authorities, competent authorities <b>and, where applicable, customs authorities, as well as ACER and the Commission in line with their tasks, responsibilities and competences and</b> to the extent <del>necessary</del> <b>possible</b> to ensure effective assessment <b>of</b> whether the conditions set out in Articles 3 <del>to 6</del> <b>and 4</b> of this Regulation are fulfilled. <del>Customs authorities from different Member States shall exchange information received from natural gas importers to the extent necessary, and cooperate with each other in order to avoid circumvention. They shall make use of existing tools and databases allowing that relevant information can be effectively exchanged between national authorities in their Member State and authorities in other Member States, or put such tools in place where necessary.</del></p> <p>deleted part moved to para 4 amended</p>	
Article 10, first paragraph a				
123a			<p><b>3. Authorising authorities or, where applicable, customs</b></p>	

	<b>CLEAN</b> <b>Commission Proposal</b>	<b>VS.EC</b> <b>EP Mandate</b>	<b>VS.EC</b> <b>Council Mandate</b>	<b>VS.EC</b> <b>Draft Agreement</b>
			<p>authorities, shall update regulatory authorities, competent authorities, ACER and the Commission, on a monthly basis, on the key elements concerning the development of imports of natural gas which originates in or is exported, directly or indirectly, from the Russian Federation, such as quantities imported under long-term or short-term supply contracts, entry points, or contract partners. These updates shall also cover key developments concerning Russian gas entering the Union under a transit procedure as referred to in Article 7(5).</p>	
Article 10, first paragraph b				
123b			<p>4. Authorising authorities and, where applicable, customs authorities, from different Member States, shall exchange, to the extent necessary, information received on natural gas imports and cooperate with one another in order to ensure efficient enforcement and avoid circumvention. They shall make</p>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			<p>use of existing tools and databases allowing for the effective exchange of relevant information between national authorities in their Member State and authorities in other Member States, or put such tools in place where necessary.</p> <p>initially in para 2</p>	
Article 10, second paragraph				
124	By 31 August 2026 and 31 August 2027, ACER shall, based on the data received under this Regulation and own information, publish a report providing an overview of contracts on the supply of gas originating in or directly or indirectly exported from Russia, and assessing the impact of diversification on energy markets.	By 31 <del>August</del> <u>March</u> 2026 and 31 <del>August</del> <u>March</u> 2027, ACER shall, based on the data received under this Regulation and own information, publish a report providing an overview of contracts on the supply of gas originating in or directly or indirectly exported from Russia, and assessing the impact of diversification on energy markets.	<p>5. By 31 August 2026 and 31 August 2027, ACER shall, based on the data received under this Regulation and <del>on</del> own information, publish a report providing an overview of contracts <del>on</del><b>for the supply of natural gas, which originates</b> gas originating in or <b>is exported</b>, directly or indirectly <del>exported from Russia,</del> <b>from the Russian Federation</b>, and assessing the impact of diversification on energy markets. <b>Where relevant, the report shall also cover data on Russian gas entering the Union under a transit procedure as referred to in Article 7(5).</b></p>	
Article 10, third paragraph				

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
125	The Commission and ACER shall share relevant information on contracts on the import of Russian gas in their possession with customs authorities where appropriate to facilitate the enforcement of this Regulation.	The Commission and ACER shall share relevant information on contracts on the import of Russian gas in their possession with customs authorities where appropriate to facilitate the enforcement of this Regulation.	6. The Commission and ACER shall, <b>where appropriate, exchange</b> share relevant information <del>on contracts on the import of Russian gas</del> in their possession <b>on contracts for the import of natural gas, which originates in or is exported, directly or indirectly, from the Russian Federation with authorising authorities and, where applicable,</b> with customs authorities where appropriate to facilitate the enforcement of this Regulation.	
Article 10, fourth paragraph				
125a		<u><i>Council Regulation (EC) No 515/97<sup>1</sup> shall apply mutatis mutandis to the exchange of information referred to in the first subparagraph.</i></u>  <u><i>1. Council Regulation (EC) No 515/97 of 13 March 1997 on mutual assistance between the administrative authorities of the Member States and cooperation between the latter and the Commission to ensure the correct application of the law on customs and agricultural matters (OJ L 82, 22.3.1997, p. 1, ELI: <a href="http://data.europa.eu/eli/reg/1997/515/oj">http://data.europa.eu/eli/reg/1997/515/oj</a>)</i></u>		
Article 10, fifth paragraph				

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125b		<u><i>The Commission shall, on the basis of information received from customs authorities of the Member States pursuant to Articles 7 and 10, publish on a quarterly basis non-confidential and aggregated information, including the entry point, volume, and stated origin of all gas imported into the Union. The Commission shall ensure the information is made publicly accessible in a clear and timely manner.</i></u>		
Article 10a				
125c		<u><i>Article 10a</i></u> <u><i>Penalties</i></u>		Bulgaria supports the objective of ensuring compliance with the Regulation; however, we do not support introducing penalties because of the additional administrative burden.
Article 10a, first paragraph				
125d		<u><i>1. Notwithstanding provisions in Regulation (EU) No 952/2013, the Member States shall lay down the rules on penalties applicable to infringements of the provisions of Chapter II, Articles 7 and 8 and Chapter IIIa and shall take all</i></u>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<p><u>measures necessary to ensure that they are implemented.</u></p> <p><u>The penalties provided for shall be effective, proportionate, and dissuasive, and shall include administrative fines. In determining the penalties, Member States shall take into account the nature, gravity, and duration of the infringement, the degree of cooperation with the competent authorities, any financial benefits gained or losses avoided by the company as a result of the infringement, any previous infringements by the company, and any mitigating or aggravating circumstances applicable to the case.</u></p> <p><u>The minimum administrative fines shall be 5% of the undertaking's total worldwide annual turnover for the preceding financial year.</u></p>		
Article 10a, second paragraph				
125e		<p><u>2. Member States shall, by one month after the enter into force of this Regulation, notify the Commission of those rules, and shall notify it, without delay,</u></p>		

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		<u><a href="#">of any subsequent amendment affecting them.</a></u>		
CHAPTER IV				
126	CHAPTER IV NATIONAL DIVERSIFICATION PLANS	CHAPTER IV NATIONAL DIVERSIFICATION PLANS	CHAPTER IV NATIONAL DIVERSIFICATION PLANS	
Article 11				
127	Article 11 National diversification plans for natural gas	Article 11 National diversification plans for natural gas	Article 11 National diversification plans for natural gas	
Article 11(1)				
128	1. Member States shall establish a diversification plan describing measures, milestones and potential barriers to diversify their gas supplies, to discontinue all imports of natural gas which originates in or is exported directly or indirectly from the Russian Federation within the deadline for the full prohibition of Russian imports on 1 January 2028.	1. Member States shall establish a diversification plan describing measures, milestones and potential barriers to diversify their gas supplies, to discontinue all imports <u><a href="#">and temporary storage, where applicable,</a></u> of natural gas which originates in or is exported directly or indirectly from the Russian Federation within the deadline for the full prohibition of Russian imports on 1 January <del>2028</del> <u>2027</u> .	1. <b>Each Member StatesState</b> shall establish a diversification plan describing measures, milestones and potential barriers to <del>diversify</del> <b>diversifying</b> their gas supplies, <b>in order</b> to discontinue all imports of natural gas, which originates in or is exported, directly or indirectly, from the Russian Federation, within the deadline for the full prohibition of <b>imports from the Russian importsFederation</b> on 1 January 2028.	
Article 11(1a)				
128a			<b>The obligation referred to in the first subparagraph shall not apply where Member</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			States can demonstrate to the Commission, in particular on the basis of information provided pursuant to Article 14(6) of Regulation (EU) 2017/1938, that they do not receive natural gas, which originates in or is exported, directly or indirectly, from the Russian Federation. Member States shall demonstrate this to the Commission by the date of notification to the Commission of the national diversification plans. The Commission shall inform the Gas Coordination Group of the Member States that are exempted from establishing a national diversification plan.	
Article 11(2)				
129	2. The national diversification plan for natural gas shall include all the following:	2. The national diversification plan for natural gas shall include all the following:	2. The national diversification plan for natural gas shall include all of the following:	
Article 11(2), point (a)				
130	(a) available information on the volume of imports of natural gas which originates in or is exported directly or indirectly from the Russian Federation under	(a) available information on the volume of imports of natural gas, <u>as well as a breakdown of the volumes of natural gas consumed on the national territory of the</u>	(a) available information on the volume of imports of natural gas which originates in or is exported, directly or indirectly, from the Russian Federation under	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	existing supply contracts, as well as on LNG terminal services contracted by natural or legal persons established in the Russian Federation, where applicable;	<i>Member State</i> , which originates in or is exported directly or indirectly from the Russian Federation under existing supply contracts, as well as on LNG terminal services contracted by natural or legal persons established in the Russian Federation, where applicable;	existing supply contracts, as well as on LNG terminal services contracted by natural or legal persons established in the Russian Federation, where applicable;	
Article 11(2), point (b)				
131	(b) a clear description of measures in place and planned at national level to replace natural gas which originates in or is exported directly or indirectly from the Russian Federation, including the quantities expected to be phased out, milestones and timeline of implementation and, insofar as available, envisaged options for alternative supplies and supply routes. Such measures may notably include the use of the Aggregate EU Platform pursuant to Article 43 of Directive (EU) 2024/718, support measures for diversification efforts of energy companies, cooperation in regional groups such as the CESEC High-Level Group, identifying alternatives to natural gas imports via electrification, energy	(b) <del>a clear description of</del> measures in place and planned at national level to replace natural gas which originates in or is exported directly or indirectly from the Russian Federation, including the quantities expected to be phased out, milestones and timeline of implementation and, insofar as available, envisaged options for alternative supplies and supply routes. Such measures may notably include the use of the Aggregate EU Platform pursuant to Article 43 of Directive (EU) 2024/718, support measures for diversification efforts of energy companies, cooperation in regional groups such as the CESEC High-Level Group, identifying alternatives to natural gas imports via electrification, energy	(b) a clear description of <b>supporting</b> measures in place and <b>supporting measures</b> planned at national level to replace natural gas, which originates in or is exported, directly or indirectly, from the Russian Federation, including the quantities expected to be phased out, milestones and a timeline <del>effor</del> <b>for</b> implementation and, <del>insofar as</del> <b>where</b> available, envisaged options for alternative supplies and supply routes. Such measures may <del>notably</del> include the use of the Aggregate EU Platform pursuant to Article <del>43 of Directive (EU) 2024/718</del> <b>42 of Regulation (EU) 2024/1789</b> , support measures for diversification efforts of energy companies, cooperation in regional groups such as the CESEC High-Level Group,	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	efficiency measures, boosting the production of biogas, biomethane and clean hydrogen, renewable energy deployment or voluntary demand reduction measures;	<u>sufficiency, energy</u> efficiency measures, boosting the production of biogas, biomethane and clean hydrogen, renewable energy deployment or voluntary demand reduction measures;	identifying <b>the identification of</b> alternatives to natural gas imports via electrification, energy efficiency measures, boosting the production of biogas, biomethane and clean hydrogen, renewable energy deployment <del>or</del> , voluntary demand reduction measures <b>or possibilities of other Member States to facilitate diversification of supply;</b>	
Article 11(2), point (ba)				
131a		<u>(ba) measures in place and planned at national level to ensure full transparency, traceability of natural gas which originates in or is exported directly or indirectly from the Russian Federation, including measures on verification of possible re-labelled imports;</u>		
Article 11(2), point (bb)				
131b		<u>(bb) measures in place to ensure that natural gas traded on spot markets is traceable to its country of production;</u>		
Article 11(2), point (c)				
132	(c) identification of any potential technical, contractual or regulatory barriers to replace	(c) identification of any potential technical, contractual or regulatory barriers to replace	(c) <b>the</b> identification of any potential technical, contractual or regulatory barriers to	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	natural gas which originates in or is exported directly or indirectly from the Russian Federation, and options to overcome those barriers.	natural gas which originates in or is exported directly or indirectly from the Russian Federation, and options to overcome those barriers.	<del>replace</del> replacing natural gas, which originates in or is exported, directly or indirectly, from the Russian Federation, and options to overcome those barriers.	
Article 11(3)				
133	3. By 1 March 2026, Member States shall notify the Commission of their national diversification plans using the template set out in Annex I.	3. By 1 March 2026, Member States shall <del>notify</del> <u>submit to</u> the Commission <del>of</del> their national diversification plans using the template set out in Annex I.	3. By 1 March 2026, Member States shall notify the Commission of their national diversification plans using the template set out in Annex I.	
Article 11(3a)				
133a		<u>3a. For the purpose of paragraph 2 point (a), importers shall report to the competent authorities of the Member States the origin and quantities of imported natural gas. The relevant competent authorities shall verify the accuracy of the submitted information, and importers shall fully cooperate with the authorities during this verification process. In justified cases, the Commission may carry out additional verifications to ensure the quality and consistency of the data.</u>		
Article 11(4)				

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134	<p>4. The Commission shall facilitate the preparation and implementation of the national diversification plans for natural gas where appropriate. Member States shall report regularly to the Gas Coordination Group established by Article 4 of Regulation (EU) 2017/1938 on the progress achieved with the preparation, adoption and implementation of those plans. On the basis of the national diversification plans, the Commission shall assess the implementation of the phase out of Russian gas and report it to the Gas Coordination Group, as per Article 13 of this Regulation.</p>	<p>4. The Commission shall facilitate the preparation and implementation of the national diversification plans for natural gas where appropriate, <u>including by providing best practices and technical assistance</u>. Member States shall report regularly to the Gas Coordination Group established by Article 4 of Regulation (EU) 2017/1938 on the progress achieved with the preparation, adoption and implementation of those plans. On the basis of the national diversification plans, the Commission shall assess the implementation of the phase out of Russian gas and report it to the Gas Coordination Group, as per Article 13 of this Regulation.</p>	<p>4. The Commission shall, <b>where appropriate</b>, facilitate the preparation and implementation of the national diversification plans for natural gas where appropriate. <b>During the transition phase for existing supply contracts pursuant to Article 4, the Commission shall coordinate with Member States in their diversification efforts to identify alternative supply sources. New supplies could also compensate for lost revenues by using existing infrastructure previously utilised to transit Russian gas.</b> Member States shall report regularly to the Gas Coordination Group established by Article 4 of Regulation (EU) 2017/1938 on the progress achieved with the preparation, adoption and implementation of those plans. On the basis of the national diversification plans, the Commission shall assess the implementation of the <del>phase out of</del> <b>phase-out of gas, which originates in or is exported, directly or indirectly, from the</b></p>	<p>We propose the following revision to the Council Mandate text: [...] <del>During the transition phase for existing supply contracts pursuant to Article 4, the Commission shall coordinate with Member States in their diversification efforts to identify alternative supply sources, including mechanisms to support operators. New supplies could also compensate for lost revenues by using existing infrastructure [...]</del></p>

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
			Russian gas Federation and report it to the Gas Coordination Group, as per Article 13 of this Regulation.	
Article 12				
135	Article 12 National diversification plans for oil	Article 12 National diversification plans for oil, <u>including petroleum products</u>	Article 12 National diversification plans for oil	Bulgaria considers that petroleum products should not be included within the scope of the REPowerEU Regulation. Extending the Regulation to petroleum products could create disproportionate administrative and market burdens and falls outside the core objective of the legislative proposal.
Article 12(1)				
136	1. Where Member States receive imports of oil originating in or exported directly or indirectly from the Russian federation, they shall establish a diversification plan describing measures, milestones and potential barriers to diversify their oil supplies, to discontinue, by 1 January 2028, imports of oil which originates in or is exported directly or indirectly from the Russian Federation.	1. <del>Where Member States receive</del> <u>In order to ensure the implementation of the prohibition on</u> imports of oil, <u>including petroleum products, referred to in Article 6a, without disruption, Member States</u> <del>originating in or exported directly or indirectly from the Russian federation, they</del> shall establish a diversification plan describing measures, milestones and potential barriers to diversify their oil supplies, <del>to discontinue,</del> by 1 January <del>2028,</del>	1. <del>Where</del> A Member States <del>receive</del> <b>State that receives</b> imports of oil originating in or exported, directly or indirectly, from the Russian Federation, <del>they</del> shall establish a diversification plan describing measures, milestones and potential barriers to <del>diversify</del> <b>diversifying</b> their oil supplies, <b>in order</b> to discontinue, by 1 January 2028, imports of oil, which originates in or is exported, directly or indirectly, from the Russian Federation.	

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		<i>imports of oil which originates in or is exported directly or indirectly from the Russian Federation.</i> <u>2026</u>		
Article 12(2)				
137	2. The national diversification plan for oil shall include all the following:	2. The national diversification plan for oil, <u>including petroleum products</u> , shall include all the following:	2. <del>The</del> A national diversification plan for oil shall include all <del>of</del> the following:	
Article 12(2), point (a)				
138	(a) available information on the volume of direct or indirect imports of oil imports from Russia under existing supply contracts;	(a) available information on the volume of direct or indirect imports of oil, <u>including petroleum products</u> , imports from Russia under existing supply contracts;	(a) available information on the volume of direct or indirect imports of oil imports from <del>Russia</del> <b>the Russian Federation</b> under existing supply contracts;	
Article 12(2), point (b)				
139	(b) measures planned at national level to replace oil which originates in or is exported directly or indirectly from the Russian Federation, including the quantities expected to be phased out, milestones and timeline of implementation, and options for alternative supplies and supply routes;	(b) measures planned at national level to replace oil, <u>including petroleum products</u> , which originates in or is exported directly or indirectly from the Russian Federation, including the quantities expected to be phased out, milestones and timeline of implementation, and options for alternative supplies <del>and</del> , supply routes <u>and energy sources</u> ;	(b) measures planned at national level to replace oil, which originates in or is exported, directly or indirectly, from the Russian Federation, including the quantities expected to be phased out, milestones and <del>a</del> timeline <del>effor</del> <b>for</b> implementation, and options for alternative supplies and supply routes <b>or possibilities of other Member States to facilitate diversification of supply</b> ;	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
Article 12(2), point (ba)				
139a		<i><u>(ba) measures in place and planned at national level to ensure full transparency, traceability of oil, including petroleum products, which originates in or is exported directly or indirectly from the Russian Federation, including measures on verification of possible re-labelled imports;</u></i>		
Article 12(2), point (bb)				
139b		<i><u>(bb) measures in place and planned at national level for implementation of framework for verifying the country of origin of oil, including petroleum products;</u></i>		
Article 12(2), point (bc)				
139c		<i><u>(bc) where introduced by the Member State concerned, measures taken in order to prevent the Russia' shadow fleets from entering its territorial waters or using its ports;</u></i>		
Article 12(2), point (c)				
140	(c) potential technical or regulatory barriers to replace oil which originates in or is exported	(c) potential technical or regulatory barriers to replace oil, <i><u>including petroleum products,</u></i>	(c) potential technical, <b>contractual</b> or regulatory barriers to <del>replace oil</del> <b>replacing oil</b> , which	

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
	directly or indirectly from the Russian Federation, and options to overcome those barriers.	which originates in or is exported directly or indirectly from the Russian Federation, and options to overcome those barriers.	originates in or is exported, directly or indirectly, from the Russian Federation, and options to overcome those barriers.	
Article 12(3)				
141	3. By 1 March 2026, Member States shall notify the Commission of their national diversification plans in accordance with / using the template set out in Annex II.	3. By 1 March 2026, Member States shall notify the Commission of their national diversification plans in accordance with / using the template set out in Annex II.	3. By 1 March 2026, Member States shall notify the Commission of their national diversification plans <del>in accordance with</del> / using the template set out in Annex II.	
Article 12(4)				
142	4. The Commission shall facilitate the preparation and implementation of the national diversification plans for oil where appropriate. Member States shall report regularly to the Oil Coordination Group established by Article 17 of Council Directive 2009/119/EC <sup>1</sup> on the progress achieved with the preparation, adoption and implementation of those national diversification plans.  <small>1. Council Directive 2009/119/EC of 14 September 2009 imposing an obligation on Member States to maintain minimum stocks of crude oil and/or petroleum products (OJ L 265, 9.10.2009, p. 9, ELI: <a href="http://data.europa.eu/eli/dir/2009/119/oj">http://data.europa.eu/eli/dir/2009/119/oj</a>).</small>	4. The Commission shall facilitate the preparation and implementation of the national diversification plans for oil, <u>including by providing best practices and technical assistance</u> where appropriate. Member States shall report regularly to the Oil Coordination Group established by Article 17 of Council Directive 2009/119/EC <sup>1</sup> on the progress achieved with the preparation, adoption and implementation of those national diversification plans.  <small>1. Council Directive 2009/119/EC of 14 September 2009 imposing an obligation on Member States to maintain minimum</small>	4. The Commission shall, <b>where appropriate</b> , facilitate the preparation and implementation of the national diversification plans for oil <del>where appropriate</del> . <b>The Commission shall assist in the cooperation between Member States when they implement the national diversification plans.</b> Member States shall report regularly to the Oil Coordination Group established by Article 17 of Council Directive 2009/119/EC <sup>1</sup> on the progress achieved <del>with</del> <b>on</b> the preparation, adoption and implementation of those national diversification plans.	

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		stocks of crude oil and/or petroleum products (OJ L 265, 9.10.2009, p. 9, ELI: <a href="http://data.europa.eu/eli/dir/2009/119/oj">http://data.europa.eu/eli/dir/2009/119/oj</a> ).	1. Council Directive 2009/119/EC of 14 September 2009 imposing an obligation on Member States to maintain minimum stocks of crude oil and/or petroleum products (OJ L 265, 9.10.2009, p. 9, ELI: <a href="http://data.europa.eu/eli/dir/2009/119/oj">http://data.europa.eu/eli/dir/2009/119/oj</a> ).	
Article 12(5)				
143	5. Where the national diversification plan for oil identifies a risk that the objective of phasing out Russian oil by 1 January 2028 may not be achieved, the Commission may issue a recommendation, after assessing the plan, to the respective Member State on how to achieve the phase out in a timely manner. Following that recommendation, the Member State shall update its diversification plan within three months, taking into consideration the Commission's recommendation.	5. Where the national diversification plan for oil identifies a risk that the objective of <del>phasing out</del> <b>implementing the prohibition of</b> Russian oil by 1 January <del>2028</del> <b>2026</b> may not be achieved, the Commission may issue a <del>recommendation</del> <b>decision</b> , after assessing the plan, to the respective Member State on how to achieve the <del>phase out</del> <b>implementation</b> in a timely manner. Following that <del>recommendation</del> <b>decision</b> , the Member State shall update its diversification plan within three months, taking into consideration the Commission's <del>recommendation</del> <b>decision</b> .	5. Where the national diversification plan for oil identifies a risk that the objective of phasing out <del>of oil, which originates in or is exported, directly or indirectly, from the Russian oil Federation,</del> by 1 January 2028 <del>may</del> <b>might</b> not be achieved, the Commission may, <b>after assessing the national diversification plan and within 3 months of the submission of the national diversification plan,</b> issue a recommendation, <del>after assessing the plan,</del> to the <del>respective</del> Member State <b>concerned</b> on how to achieve the <del>phase out</del> <b>phaseout</b> in a timely manner. Following that recommendation, the Member State shall update its diversification plan within three months, taking into consideration the Commission's recommendation.	

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CHAPTER V				
144	CHAPTER V MONITORING OF SECURITY OF GAS SUPPLY	CHAPTER V MONITORING OF SECURITY OF GAS SUPPLY	CHAPTER V MONITORING OF SECURITY OF GAS SUPPLY	
Article 13				
145	Article 13 Amendments to Regulation (EU) 2017/1938	Article 13 Amendments to Regulation (EU) 2017/1938	Article 13 Amendments to Regulation (EU) 2017/1938	
Article 13, first paragraph				
146	Regulation (EU) 2017/1938 is amended as follows:	Regulation (EU) 2017/1938 is amended as follows:	Regulation (EU) 2017/1938 is amended as follows:	
Article 13, first paragraph, point (1)				
147	(1) in Article 2, the following points (32) and (33) are added:	(1) in Article 2, the following points (32) and (33) are added:	(1) in Article 2, the following points ( <del>32</del> 33) and ( <del>33</del> 34) are added:	
Article 13, first paragraph, point (1), amending provision, numbered paragraph (33)				
148	‘ (33) ‘take-or-pay provision’ means a contractual provision which obliges the buyer to either take delivery of, or alternatively pay for a specified minimum quantity of gas within a given period, regardless of whether the gas is actually received;	‘ (33) ‘take-or-pay provision’ means a contractual provision which obliges the buyer to either take delivery of, or alternatively pay for a specified minimum quantity of gas within a given period, regardless of whether the gas is actually received;	‘ (33) ‘take-or-pay provision’ means a contractual provision which obliges the buyer to either take delivery of, or alternatively pay for a specified minimum quantity of gas within a given period, regardless of whether the gas is actually received;	
Article 13, first paragraph, point (1), amending provision, numbered paragraph (34)				
149	(34) deliver-or-pay provisions’ means a contractual provision	(34) deliver-or-pay provisions’ means a contractual provision	(34) ‘deliver-or-pay provisions’ means a contractual	

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	which obliges the seller to pay a contractual fine in case of non-delivery of gas.;	which obliges the seller to pay a contractual fine in case of non-delivery of gas.;	provision which obliges the seller to pay a contractual fine in <b>the</b> case of non-delivery of gas.;	
Article 13, first paragraph, point (2)				
150	(2) Article 14(6) is amended as follows:	(2) Article 14(6) is amended as follows:	(2) Article 14(6) is amended as follows:	
Article 13, first paragraph, point (2)(a)				
151	(a) in the first subparagraph, the following point (c) is added:	(a) in the first subparagraph, the following point (c) is added:	(a) in the first subparagraph, the following point (c) is added:	
Article 13, first paragraph, point (2)(a), amending provision, numbered paragraph (c)				
152	(c) to the Commission and to the concerned competent authority the following information relating to supply contracts for natural gas which originates in or is exported directly or indirectly from the Russian Federation:	(c) to the Commission and to the concerned competent authority the following information relating to supply contracts for natural gas which originates in or is exported directly or indirectly from the Russian Federation:	(c) to the Commission and to the <del>concerned</del> <b>authorities concerned</b> the following information relating to supply contracts for natural gas, which originates in or is exported, directly or indirectly, from the Russian Federation:	
Article 13, first paragraph, point (2)(a), amending provision, numbered paragraph (c), point (i)				
153	(i) the information referred to in Article 7(2) of Regulation (EU) XX/2025 - this Regulation;	(i) the information referred to in Article 7(2) of Regulation (EU) XX/2025 - this Regulation;	(i) the information referred to in Article <del>7(2)</del> <b>7(1)</b> of Regulation (EU) XX/2025 –[this Regulation];	
Article 13, first paragraph, point (2)(a), amending provision, numbered paragraph (c), point (ii)				
154	(ii) information on quantities to be supplied and taken, including	(ii) information on quantities to be supplied and taken, including	(ii) information on <b>the</b> quantities to be supplied and	

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	possible flexibilities under take-or-pay provisions or deliver-or-pay provisions;	possible flexibilities under take-or-pay provisions or deliver-or-pay provisions;	taken, including possible flexibilities under take-or-pay provisions or deliver-or-pay provisions;	
Article 13, first paragraph, point (2)(a), amending provision, numbered paragraph (c), point (iii)				
155	(iii) delivery schedules (LNG) or nominations (pipeline gas);	(iii) delivery schedules (LNG) or nominations (pipeline gas);	(iii) delivery schedules (LNG) or nominations (pipeline gas);	
Article 13, first paragraph, point (2)(a), amending provision, numbered paragraph (c), point (iv)				
156	(iv) possible contractual flexibilities concerning the annual contracted quantities, including make-up quantities;	(iv) possible contractual flexibilities concerning the annual contracted quantities, including make-up quantities;	(iv) possible contractual flexibilities concerning the annual contracted quantities, including make-up quantities;	
Article 13, first paragraph, point (2)(a), amending provision, numbered paragraph (c), point (v)				
157	(v) conditions for the suspension or termination of gas deliveries, including force majeure provisions;	(v) conditions for the suspension or termination of gas deliveries, including force majeure provisions;	(v) conditions for the suspension or termination of gas deliveries, including force majeure provisions;	
Article 13, first paragraph, point (2)(a), amending provision, numbered paragraph (c), point (vi)				
158	(vi) information on which law is governing the contract and which arbitration mechanism is chosen;	(vi) information on which law is governing the contract and which arbitration mechanism is chosen;	(vi) information on which law <del>is governing</del> governs the contract and which arbitration mechanism is chosen;	
Article 13, first paragraph, point (2)(a), amending provision, numbered paragraph (c), point (vii)				
159	(vii) key elements of other commercial agreements that are relevant for the execution of the gas supply contract, excluding price information.;	(vii) key elements of other commercial agreements that are relevant for the execution of the gas supply contract, excluding price information.;	(vii) key elements of other commercial agreements that are relevant for the execution of the gas supply contract, excluding price information.;	

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Article 13, first paragraph, point (2)(b)				
160	(b) the following third and fourth subparagraphs are added:	(b) the following third and fourth subparagraphs are added:	(b) the following third and fourth subparagraphs are added: <b>a</b> subparagraph is added:	
Article 13, first paragraph, point (2)(b), amending provision, first paragraph				
161	The information referred to in point (c) shall be provided for each contract in a disaggregated format, including the full relevant text parts, excluding price information, notably where the full knowledge of the formulation of the contractual provisions is crucial for the security of supply assessment or where certain contractual provisions are interrelated.	The information referred to in point (c) shall be provided for each contract in a disaggregated format, including the full relevant text parts, excluding price information, notably where the full knowledge of the formulation of the contractual provisions is crucial for the security of supply assessment or where certain contractual provisions are interrelated.	The information referred to in point (c) shall be provided for each contract in a disaggregated format, including the full relevant text parts <b>in full</b> , excluding price information, <b>notably in particular</b> where the full knowledge of the formulation of the contractual provisions is crucial for the <b>assessment of the security of gas supply</b> assessment or where certain contractual provisions are interrelated.	
Article 13, first paragraph, point (2)(b), amending provision, second paragraph				
162	Providers of LNG terminal services shall provide the Commission with information concerning services booked by customers from the Russian Federation, customers controlled by undertakings from the Russian Federation, including contracted	Providers of LNG terminal services shall provide the Commission with information concerning services booked by customers from the Russian Federation, customers controlled by undertakings from the Russian Federation, including contracted	<del>Providers of LNG terminal services shall provide the Commission with information concerning services booked by customers from the Russian Federation, customers controlled by undertakings from the Russian Federation, including contracted</del>	

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	services, affected quantities and contract duration.;	services, affected quantities and contract duration.;	<del>services, affected quantities and contract duration.;</del> <b>deleted</b>	
Article 13, first paragraph, point (3)				
163	(3) in Article 17, the second paragraph is replaced by the following:	(3) in Article 17, the second paragraph is replaced by the following:	(3) in Article 17, the second paragraph is replaced by the following:	
Article 13, first paragraph, point (3), amending provision, first paragraph				
164	The Commission shall carry a continuous monitoring of an exposure of the Union's energy system to Russian gas supplies, notably on the basis of information notified to competent authorities pursuant to Article 14(6), point (c).	The Commission shall carry a continuous monitoring of an exposure of the Union's energy system to Russian gas supplies, <b><i>also via third countries</i></b> notably on the basis of information notified to competent authorities pursuant to Article 14(6), point (c).	The Commission shall <del>carry a continuous monitoring of an exposure of the Union's energy system to Russian gas supplies of</del> <b>continuously monitor the exposure of the Union's energy system to Russian gas supplies of gas, which originates in or is exported, directly or indirectly, from the Russian Federation in particular,</b> notably on the basis of information notified to <b>the Commission and the</b> competent authorities pursuant to <b>accordance with</b> Article 14(6), point (c).	
Article 13, first paragraph, point (3), amending provision, second paragraph				
165	The Commission shall assess the implementation of the phase out of Russian gas pursuant to Regulation (EU) XX/2025 at national, regional and Union level	The Commission shall assess the implementation of the phase out of Russian gas pursuant to Regulation (EU) XX/2025 at national, regional and Union level	The Commission shall assess the implementation of the <del>phase-out of</del> <b>phase-out of gas, which originates in or is exported, directly or indirectly, from the</b>	

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	on the basis of the national diversification plans pursuant to Article 11 of that Regulation. This assessment shall be reported to the Gas Coordination Group.	on the basis of the national diversification plans pursuant to Article 11 of that Regulation. This assessment shall be reported to the Gas Coordination Group.	Russian gas pursuant to <del>Federation</del> under Regulation (EU) XX/2025 at national, regional and Union level on the basis of the national diversification plans pursuant to <del>referred to in</del> Article 11 of that Regulation. <b>That assessment shall also include an evaluation of the effectiveness of the exchange of information and cooperation among the relevant authorities, and, where appropriate, shall set out recommendations for their improvement.</b> This assessment shall be reported to the Gas Coordination Group.	
Article 13, first paragraph, point (3), amending provision, third paragraph				
166	On the basis of the conclusions of the assessment referred to in the third paragraph, the Commission shall publish an annual report, which shall provide a comprehensive overview of the progress achieved by Member States in implementing their national diversification plans.	On the basis of the conclusions of the assessment referred to in the third paragraph, the Commission shall publish an annual report, which shall provide a comprehensive overview of the progress achieved by Member States in implementing their national diversification plans.	On the basis of the conclusions of the assessment referred to in the third paragraph, the Commission shall publish an annual report, which shall provide a comprehensive overview of the progress achieved by Member States in implementing their national diversification plans.	
Article 13, first paragraph, point (3), amending provision, fourth paragraph				
167	Where relevant, the report referred to in the fourth paragraph may be	Where relevant, the report referred to in the fourth paragraph may be	Where relevant, the <del>report referred to in the fourth paragraph</del> may be	

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	accompanied by a Commission recommendation which identifies possible actions and measures to ensure secure supply diversification and a timely phase out of Russian gas.	accompanied by a Commission <del>recommendation</del> <u>decision</u> which identifies possible actions and measures to ensure secure supply diversification and a timely phase out of Russian gas.	<del>accompanied by a Commission</del> <b>may issue, within three months of notification of a diversification plan, a recommendation which identifies possible actions and measures to ensure a secure supply diversification of gas supply and a timely phase-out of gas, which originates in or is exported, directly or indirectly, from the Russian gas Federation.</b>	
Article 13, first paragraph, point (3), amending provision, fifth paragraph				
168	The Member States concerned shall update their national diversification plan within three months, taking into consideration the Commission's recommendation..	The Member States concerned shall update their national diversification plan within three months, taking into consideration the Commission's <del>recommendation</del> <u>decision</u> ..?	The Member States concerned shall update their national diversification plan within three months, taking into consideration the Commission's recommendation.-	
CHAPTER VI				
169	CHAPTER VI FINAL PROVISIONS	CHAPTER VI FINAL PROVISIONS	CHAPTER VI FINAL PROVISIONS	
Article 14				
170	Article 14 Professional secrecy	Article 14 Professional secrecy	Article 14 Professional secrecy	
Article 14(1)				

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171	1. Any confidential information received, exchanged, or transmitted pursuant to this Regulation shall be subject to the conditions of professional secrecy laid down in this Article.	1. Any confidential information received, exchanged, or transmitted pursuant to this Regulation shall be subject to the conditions of professional secrecy laid down in this Article.	1. Any confidential information received, exchanged, or transmitted pursuant to <del>in</del> <b>accordance with</b> this Regulation shall be subject to the conditions of professional secrecy laid down in this Article.	
Article 14(2)				
172	2. The obligation of professional secrecy shall apply to all persons who work or who have worked for authorities involved in the implementation of this Regulation or any natural or legal person to whom the relevant authorities have delegated its powers, including auditors and experts contracted by the competent authorities.	2. The obligation of professional secrecy shall apply to all persons who work or who have worked for authorities involved in the implementation of this Regulation or any natural or legal person to whom the relevant authorities have delegated its powers, including auditors and experts contracted by the competent authorities.	2. The obligation of professional secrecy shall apply to all persons who work or who have worked for authorities involved in the implementation of this Regulation <del>or</del> <b>and to</b> any natural or legal person to whom the relevant authorities have delegated <del>its</del> <b>their</b> powers, including auditors and experts contracted by the <del>competent</del> <b>relevant</b> authorities.	
Article 14(3)				
173	3. Information covered by professional secrecy shall not be disclosed to any other person or authority except by virtue of provisions laid down by Union or national law.	3. Information covered by professional secrecy shall not be disclosed to any other person or authority except by virtue of provisions laid down by Union or national law.	3. Information covered by professional secrecy shall not be disclosed to any other person or authority except by virtue of provisions laid down by Union or national law.	
Article 14(4)				
174	4. All information exchanged between the relevant authorities under this Regulation that	4. All information exchanged between the relevant authorities under this Regulation that	4. All information exchanged between the relevant authorities <b>or Member States</b> under this	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
	concerns business or operational conditions, and other economic or personal affairs shall be considered confidential and shall be subject to the requirements of professional secrecy, except where the competent authority states at the time of communication that such information may be disclosed or where such disclosure is necessary for legal proceedings.	concerns business or operational conditions, and other economic or personal affairs shall be considered confidential and shall be subject to the requirements of professional secrecy, except where the competent authority states at the time of communication that such information may be disclosed or where such disclosure is necessary for legal proceedings.	Regulation that concerns business <b>conditions</b> or operational conditions, <del>and or</del> other economic or personal affairs shall be considered confidential and shall be subject to the requirements of professional secrecy, except where the <del>competent</del> <b>relevant</b> authority states at the time of <b>the</b> communication that such information may be disclosed, <b>is required by virtue of Union or national law</b> or where such disclosure is necessary for legal proceedings.	
Article 15				
175	Article 15 Monitoring and review	Article 15 <del>Monitoring and review</del> <del>deleted</del>	Article 15 Monitoring and review	We believe that Article 15 should be retained and propose the following addition to paragraph 1:
Article 15, first paragraph				
176	The Commission shall continuously monitor the development of the Union's energy market, notably with respect to potential gas supply dependencies or other security of supply risks in relation to energy imports from the Russian Federation. In the case of sudden and significant developments,	<del>The Commission shall continuously monitor the development of the Union's energy market, notably with respect to potential gas supply dependencies or other security of supply risks in relation to energy imports from the Russian Federation. In the case of sudden and significant developments, seriously</del>	<b>1.</b> The Commission shall continuously monitor the development of the Union's energy market, <del>notably</del> <b>in particular</b> with respect to potential gas supply dependencies or other <b>risks to the</b> security of energy supply risks in relation to energy imports from the Russian Federation. <del>In the case of sudden</del>	[...]By [OJ: please insert date two years after entry into force of this Regulation], the Commission shall submit a report on the implementation of this Regulation to the European Parliament and the Council, <b><u>including an assessment of its impact on operators.</u></b>

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	seriously threatening the security of supply of one or more Member States, the Commission may authorise one or more Member States to temporarily suspend the application of Chapter Two of this Regulation, in whole or in part. The Commission decision may contain certain conditions, in particular, to ensure that any suspension is strictly limited to addressing the threat.	<del>threatening the security of supply of one or more Member States, the Commission may authorise one or more Member States to temporarily suspend the application of Chapter Two of this Regulation, in whole or in part. The Commission decision may contain certain conditions, in particular, to ensure that any suspension is strictly limited to addressing the threat.</del> <u>deleted</u>	and significant developments, seriously threatening the security of supply of one or more Member States <b>By [OJ: please insert date two years after entry into force of this Regulation]</b> , the Commission may authorise one or more Member States to temporarily suspend the application of Chapter Two <b>shall submit a report on the implementation</b> of this Regulation, in whole or in part. The Commission decision may contain certain conditions, in particular, to ensure that any suspension is strictly limited to addressing the threat <b>to the European Parliament and the Council.</b>  split compared to COM proposal, deleted part amended in the next para	
Article 15, first paragraph a				
176a			<b>In the case of sudden and significant developments, seriously threatening the security of energy supply of one or more Member States, the Commission may temporarily suspend the application of</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			Chapter II of this Regulation in one or more Member States, in whole or in part. The Commission may, in such a situation, also suspend the requirement of prior authorisation pursuant to Article 7(2). The Commission's decision shall contain certain conditions, in particular to ensure that any suspension is strictly limited to addressing the threat. The Commission shall inform the Gas Coordination Group about any suspensions.	
Article 15a				
176b		<a href="#">Article 15a Committee Procedure</a>		
Article 15a(1)				
176c		<a href="#">1. The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</a>		
Article 15a(2)				
176d		<a href="#">2. Where reference is made to this paragraph, Article 4 of Regulation (EU) No 182/2011 shall apply.</a>		

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Article 15a(3)				
176e		<u>3. Where reference is made to this paragraph, Article 8 of Regulation (EU) No 182/2011, in conjunction with Article 4 thereof, shall apply.</u>		
Article 15b				
176f		<u>Article 15b Exercise of the delegation</u>		
Article 15b(1)				
176g		<u>1. The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.</u>		
Article 15b(2)				
176h		<u>2. The power to adopt delegated acts referred to in Article 7 shall be conferred on the Commission for an indeterminate period of time from ... [date of entry into force].</u>		
Article 15b(3)				
176i		<u>3. The delegation of power referred to in Article 7 may be revoked at any time by the European Parliament or by the Council. A decision to revoke shall put an end to the delegation</u>		

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
		<i><u>of the power specified in that decision. It shall take effect the day following the publication of the decision in the Official Journal of the European Union or at a later date specified therein. It shall not affect the validity of any delegated acts already in force.</u></i>		
Article 15b(4)				
176j		<i><u>4. Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making.</u></i>		
Article 15b(5)				
176k		<i><u>5. As soon as it adopts a delegated act, the Commission shall notify it simultaneously to the European Parliament and to the Council.</u></i>		
Article 15b(6)				
176l		<i><u>6. A delegated act adopted pursuant to Article 7 shall enter into force only if no objection has been expressed either by the European Parliament or by the</u></i>		

	CLEAN Commission Proposal	vs.EC EP Mandate	vs.EC Council Mandate	vs.EC Draft Agreement
		<u><i>Council within a period of two months of notification of that act to the European Parliament and the Council or if, before the expiry of that period, the European Parliament and the Council have both informed the Commission that they will not object. That period shall be extended by [two months] at the initiative of the European Parliament or of the Council.</i></u>		
Article 16				
177	Article 16 Entry into force	Article 16 Entry into force	Article 16 Entry into force <b>and application</b>	
Article 16, first paragraph				
178	This Regulation shall enter into force on the day following that of its publication in the Official Journal of the European Union.	This Regulation shall enter into force on the day following that of its publication in the Official Journal of the European Union.	This Regulation shall enter into force on the day following that of its publication in the Official Journal of the European Union.	
Article 16, first paragraph a				
178a			<b>Articles 3 and 4 shall apply from [OJ: please insert the date - 6 weeks after the entry into force of this Regulation].</b>	
Article 16, first paragraph b				
178b			<b>Article 7 paragraphs 1, 4 and 5 shall apply from [OJ: please insert the date - 6 weeks minus</b>	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
			<i>one month after the entry into force of this Regulation</i> ].	
Article 16, first paragraph c				
178c			Article 7 paragraph 2 shall apply from [ <i>OJ: please insert the date - 6 weeks minus 5 working days after the entry into force of this Regulation</i> ].	
Article 16, first paragraph d				
178d			<b>This Regulation is without prejudice to the application of the prohibition related to LNG established in [Council Regulation (EU) No 833/2014]<sup>1</sup> which shall apply and be complied with regardless of the provisions of this Regulation.</b>  <b>1. OJ: please insert updated reference</b>	
Article 16, second paragraph				
179	This Regulation shall be binding in its entirety and directly applicable in all Member States.	This Regulation shall be binding in its entirety and directly applicable in all Member States.	This Regulation shall be binding in its entirety and directly applicable in all Member States.	
Formula				
180	Done at Strasbourg,	Done at Strasbourg,	Done at <del>Strasbourg</del> ...	
Formula				
180a			<b>For the European Parliament</b>	

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Formula				
180b			The President	
Formula				
180c			For the Council	
Formula				
181	The President	The President	The President	
ANNEX I				
182	ANNEX I	ANNEX I	ANNEX I	
ANNEX I, point 1., first subparagraph				
183	1. Template for national diversification plans for natural gas	1. Template for national diversification plans for natural gas	1. Template for national diversification plans for natural gas	
ANNEX I, point 1., second subparagraph				
184	This template is designed for national authorities drafting a national diversification plan as provided for in Article 11. It shall include the following:	This template is designed for national authorities drafting a national diversification plan as provided for in Article 11. It shall include the following:	This template is designed for national authorities drafting a national diversification plan as provided for in Article 11. It shall include the following:	
ANNEX I, first paragraph				
185	General information	General information	General information	
ANNEX I, Table 1				
186	Table 1	Table 1	Table 1	
ANNEX I, second paragraph				
187	Main information about the import of gas which originates in or is	Main information about the import <u>or temporary storage</u> of gas which	Main information about the import of gas which originates in or is	

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	exported directly or indirectly from the Russian Federation to the Member State	originates in or is exported directly or indirectly from the Russian Federation to the Member State	exported directly or indirectly from the Russian Federation to the Member State	
ANNEX I, Table 2				
188	Table 2	Table 2	Table 2 amended	
ANNEX I, third paragraph				
189	Description of the measures to replace natural gas which originates in or is exported directly or indirectly from the Russian Federation.	Description of the measures to replace natural gas which originates in or is exported directly or indirectly from the Russian Federation.	Description of the measures to replace natural gas which originates in or is exported directly or indirectly from the Russian Federation.	
ANNEX I, point 2., first subparagraph				
190	3.1. The description shall include the following elements:	3.1. The description shall include the following elements:	3.1. The description shall include the following elements:	
ANNEX I, point 2., first subparagraph, Table 3				
191	Table 3	Table 3	Table 3	
ANNEX I, point 2., second subparagraph				
192	Technical or regulatory barriers to replace gas which originates in or is exported directly or indirectly from the Russian Federation.	Technical or regulatory barriers to replace gas which originates in or is exported directly or indirectly from the Russian Federation.	Technical, <b>contractual</b> or regulatory barriers to replace gas which originates in or is exported directly or indirectly from the Russian Federation.	
ANNEX I, point 2., second subparagraph, Table 4				
193	Table 4	Table 4	Table 4 amended	
ANNEX I, point 2., second subparagraph, Table 5				

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194	Table 5	Table 5	Table 5	
ANNEX II				
195	ANNEX II	ANNEX II	ANNEX II	
ANNEX II, point 1., first subparagraph				
196	2. Template for national diversification plans for oil	2. Template for national diversification plans for oil	2. Template for national diversification plans for oil	
ANNEX II, point 1., second subparagraph				
197	This template is designed for national authorities drafting a detailed national diversification plan as provided for in Article 12. It shall include:	This template is designed for national authorities drafting a detailed national diversification plan as provided for in Article 12. It shall include:	This template is designed for national authorities drafting a detailed national diversification plan as provided for in Article 12. It shall include:	
ANNEX II, first paragraph				
198	General information	General information	General information	
ANNEX II, Table 6				
199	Table 6	Table 6	Table 6	
ANNEX II, second paragraph				
200	Main information about the import of oil which originates in or is exported directly or indirectly from the Russian Federation to the Member State	Main information about the import <u>or temporary storage</u> of oil, <u>including petroleum products</u> , which originates in or is exported directly or indirectly from the Russian Federation to the Member State	Main information about the import of oil which originates in or is exported directly or indirectly from the Russian Federation to the Member State	
ANNEX II, Table 7				
201	Table 7	Table 7	Table 7	

	CLEAN Commission Proposal	VS.EC EP Mandate	VS.EC Council Mandate	VS.EC Draft Agreement
ANNEX II, third paragraph				
202	Description of the measures to replace oil which originates in or is exported directly or indirectly from the Russian Federation.	Description of the measures to replace oil, <u>including petroleum products</u> , which originates in or is exported directly or indirectly from the Russian Federation.	Description of the measures to replace oil which originates in or is exported directly or indirectly from the Russian Federation.	
ANNEX II, fourth paragraph				
203	The description shall include the following elements:	The description shall include the following elements:	The description shall include the following elements:	
ANNEX II, fourth paragraph, Table 8				
204	Table 8	Table 8	Table 8	
ANNEX II, fifth paragraph				
205	Technical or regulatory barriers to replace oil which originates in or is exported directly or indirectly from the Russian Federation.	Technical or regulatory barriers to replace oil, <u>including petroleum products</u> , which originates in or is exported directly or indirectly from the Russian Federation.	Technical, <b>contractual</b> or regulatory barriers to replace oil which originates in or is exported directly or indirectly from the Russian Federation.	
ANNEX II, Table 9				
206	Table 9	Table 9	Table 9 amended	

## Commission Proposal Table 1

Name of the authority responsible for the preparation of the plan
Description of the gas system. It should include a description of: (i) the gas demand; (ii) the supply mix considering the dependence on Russian supply.

## EP Mandate Table 1

Name of the authority responsible for the preparation of the plan
Description of the gas system. It should include a description of: (i) the gas demand; (ii) the supply mix considering the dependence on Russian supply.

## Council Mandate Table 1

Name of the authority responsible for the preparation of the plan
Description of the gas system. It should include a description of: (i) the gas demand; (ii) the supply mix considering the dependence on Russian supply.

## Commission Proposal Table 2

Reference of the individual contracts as communicated by the importers to the competent authorities and the Commission.
LNG terminal services booked by companies from the Russian Federation
Overall contracted quantities of Russian gas for delivery in the Member State. Include contractual flexibilities and point of delivery (interconnection point, import point, LNG terminal, etc).

## EP Mandate Table 2

Reference of the individual contracts as communicated by the importers to the competent authorities and the Commission.
LNG terminal services booked by <del>companies</del> <u>natural persons or legal entities</u> from the Russian Federation <u>or by legal entities directly or indirectly owned, controlled or under significant influence by the Russian Federation</u>
Overall contracted quantities of Russian gas for delivery <u>in the Member State, including a breakdown of the volumes of natural gas consumed</u> in the Member State. Include contractual flexibilities and point of delivery (interconnection point, import point, LNG terminal, etc).

## Council Mandate Table 2

Reference of the individual contracts as communicated by the importers to the competent authorities and the Commission.
<del>LNG terminal services booked by companies from the Russian Federation</del>
Overall contracted quantities of <b>gas which originates in or is exported, directly or indirectly, from the Russian gas Federation</b> for delivery in the Member State. Include contractual flexibilities and point of delivery (interconnection point, import point, LNG terminal, etc).

### Commission Proposal Table 3

Diversification options: (i) alternative supplies; (ii) alternative supply routes; (iii) demand aggregation.
Description of the measure and its objectives, including quantities expected to be phase out and intermediate steps in case of a multi-stage measure.
Implementation timeline
Impact of the measures to the energy system, including on flow patterns, infrastructure capacities, tariffs, etc.
Impact on neighbouring Member States.

### EP Mandate Table 3

Diversification options: (i) alternative supplies; (ii) alternative supply routes; (iii) demand aggregation.
<del>Description of</del> The measure and its objectives, including quantities expected to be phase out and intermediate steps in case of a multi-stage measure. <u>Measures to trace and verify potential re-labelled imports. Measures to trace country of production of gas traded on spot markets.</u>
<u>Other measures referred to in Article 11 paragraph 2(b)</u>
Implementation timeline
Impact of the measures to the energy system, including on flow patterns, infrastructure capacities, tariffs, etc.
Impact on neighbouring Member States.

### Council Mandate Table 3

Diversification options: (i) alternative supplies; (ii) alternative supply routes; (iii) demand aggregation.
Description of the measure and its objectives, including quantities expected to be phase out and intermediate steps in case of a multi-stage measure.
Implementation timeline
Impact of the measures to the energy system, including on flow patterns, infrastructure capacities, tariffs, etc.
Impact on neighbouring Member States.

## Commission Proposal Table 4

Technical and regulatory barriers	
Options to overcome barriers and timeline	

**EP Mandate Table 4**

Technical and regulatory barriers	
Options to overcome barriers and timeline	

## Council Mandate Table 4

Technical, <del>contractual or</del> regulatory barriers	
Options to overcome barriers and timeline	

## Commission Proposal Table 5

Category	Replacement of volumes for the phase out <sup>1</sup>
Information required	Description of measures in place and planned at national level to replace the remaining volumes of natural gas originated in or exported directly or indirectly from the Russian Federation (i) quantities expected to be phased out by each measure, (ii) implementation timeline (start-end), (iii) options for alternative supplies and supply routes
Pipeline gas	
LNG	

1. Such measures may include the use of the Aggregate EU Platform pursuant to Article 42 of Regulation (EU) 2024/1789, [The reference seems to be incorrect, please check and correct] support measures for diversification efforts of energy companies, cooperation in regional groups such as the Central and South-Eastern Europe Energy Connectivity (CESEC) High-Level Group, identifying alternatives to natural gas imports via electrification, energy efficiency measures, boosting the production of biogas, biomethane and clean hydrogen, renewable energy deployment or voluntary demand reduction measures.

## EP Mandate Table 5

Category	Replacement of volumes for the phase out <sup>1</sup>
Information required	Description of measures in place and planned at national level to replace the remaining volumes of natural gas originated in or exported directly or indirectly from the Russian Federation (i) quantities expected to be phased out by each measure, (ii) implementation timeline (start-end), (iii) options for alternative supplies and supply routes
Pipeline gas	
LNG	

1. Such measures may include the use of the Aggregate EU Platform pursuant to Article 42 of Regulation (EU) 2024/1789, [The reference seems to be incorrect, please check and correct] support measures for diversification efforts of energy companies, cooperation in regional groups such as the Central and South-Eastern Europe Energy Connectivity (CESEC) High-Level Group, identifying alternatives to natural gas imports via electrification, energy efficiency measures, boosting the production of biogas, biomethane and clean hydrogen, renewable energy deployment or voluntary demand reduction measures.

## Council Mandate Table 5

Category	Replacement of volumes for the phase out <sup>1</sup>
Information required	Description of measures in place and planned at national level to replace the remaining volumes of natural gas originated in or exported directly or indirectly from the Russian Federation (i) quantities expected to be phased out by each measure, (ii) implementation timeline (start-end), (iii) options for alternative supplies and supply routes
Pipeline gas	
LNG	

1. Such measures may include the use of the Aggregate EU Platform pursuant to Article 42 of Regulation (EU) 2024/1789, ~~{The reference seems to be incorrect, please check and correct}~~ support measures for diversification efforts of energy companies, cooperation in regional groups such as the Central and South-Eastern Europe Energy Connectivity (CESEC) High-Level Group, identifying alternatives to natural gas imports via electrification, energy efficiency measures, boosting the production of biogas, biomethane and clean hydrogen, renewable energy deployment or voluntary demand reduction measures.

## Commission Proposal Table 6

Name of the authority responsible for the preparation of the plan
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Description of the oil system. It should include a description of: (i) the oil demand; (ii) the supply mix considering the dependence on Russian supply.
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## EP Mandate Table 6

Name of the authority responsible for the preparation of the plan
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Description of the oil system. It should include a description of: (i) the oil demand; (ii) the supply mix considering the dependence on Russian supply.
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## Council Mandate Table 6

Name of the authority responsible for the preparation of the plan
Description of the oil system. It should include a description of: (i) the oil demand; (ii) the supply mix considering the dependence on Russian supply.

### Commission Proposal Table 7

Overall contracted quantities of Russian oil for delivery in the Member State. Include expiry date of contractual obligations.
Information about the identity of the different stakeholders (seller, importer, and buyer).

## EP Mandate Table 7

Overall contracted quantities of Russian *oil for delivery in the Member State. Include overall contracted quantities of petroleum products obtained from Russian origin* oil for delivery in the Member State. Include expiry date of contractual obligations.

Information about the identity of the different stakeholders (seller, importer, and buyer).

## Council Mandate Table 7

Overall contracted quantities of Russian oil for delivery in the Member State. Include expiry date of contractual obligations.

Information about the identity of the different stakeholders (seller, importer, and buyer).

## Commission Proposal Table 8

Diversification options: (i) alternative supplies; (ii) alternative supply routes.
Description of the measure and its objectives, including quantities expected to be phased out and intermediate steps in case of a multi-stage measure.
Implementation timeline
Impact of measures to the energy system, including on flow patterns, infrastructure capacities, tariffs, etc.
Impact on neighbouring Member States.

## EP Mandate Table 8

Diversification options: (i) alternative supplies; (ii) alternative supply routes.
<i>Description of</i> The measure and its objectives, including quantities expected to be phased out and intermediate steps in case of a multi-stage measure. <u>Measures to trace and verify potential re-labelled imports. Measure to verify the country of origin of oil, including petroleum products. Measures to prevent shadow fleets, where applicable.</u>
Implementation timeline
Impact of measures to the energy system, including on flow patterns, infrastructure capacities, tariffs, etc.
Impact on neighbouring Member States.

## Council Mandate Table 8

Diversification options: (i) alternative supplies; (ii) alternative supply routes.
Description of the measure and its objectives, including quantities expected to be phased out and intermediate steps in case of a multi-stage measure.
Implementation timeline
Impact of measures to the energy system, including on flow patterns, infrastructure capacities, tariffs, etc.
Impact on neighbouring Member States.

## Commission Proposal Table 9

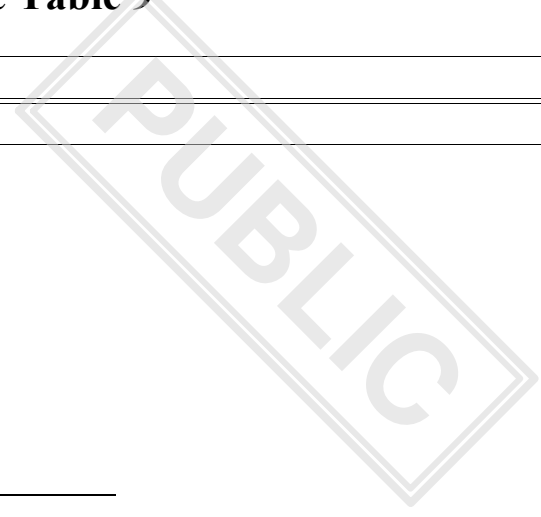
Technical and regulatory barriers	
Options to overcome reach barrier and timeline	

**EP Mandate Table 9**

Technical and regulatory barriers	
Options to overcome reach barrier and timeline	

## Council Mandate Table 9

Technical, <b>contractual</b> or <del>and</del> regulatory barriers	
Options to overcome <del>each</del> barrier and timeline	



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