Joint industry recommendations for simplification of the importer requirements of the EU Methane Regulation (EU) 2024/1787

As the MRV equivalency requirements scheduled to apply from 1st January 2027 are, for the reasons outlined below, not feasible to achieve in practice in the given timeline, we call for the stop-the-clock and consideration of the targeted amendments proposed in this document.

We, the undersigned representatives, **fully support the objective of reducing methane emissions by the EU Methane Emissions Regulation (EUMR)** and EU's ambition to reduce greenhouse gas emissions and advance global climate leadership. Our sector is actively advancing efforts to reduce methane emissions through innovation (e.g., investing in advanced monitoring technologies), voluntary action (e.g., OGMP 2.0), and engaging in collaborative projects with international partners to deliver methane reductions (e.g., OGDC). **Our goal is to ensure that the EUMR's provisions are effective, achievable and practical** - achieving real environmental impact while safeguarding Europe's energy security, competitiveness, and industrial resilience.

The importer requirements of EUMR **introduce a new layer of compliance risks and contractual complexities for natural gas, LNG and crude oil importers**, which will affect crude and natural gas markets whilst putting a significant burden and compliance risk on EU importers, with uncertain extraterritorial implications, which is expected to reduce supply options for the EU, reduce operational flexibility and increase costs for compliant molecules.[1] These challenges are exacerbated as the EU is looking for more diverse supply, notably following the phase-out of natural gas supply from Russia.

The most pressing issues are linked to equivalency requirements that start in 2027:

- Many crude oil and natural gas producers in third countries will simply not be able to meet the high requirements for equivalency in time.
- This is partly due to the lack of clarity around, and availability of, recognized verification protocols, as well as the limited number of accredited verifiers with expertise on methane measurement, and the time typically required to complete such independent verification for a particular asset/operator.
- In addition, importers often cannot identify the producer as supply chains are usually complex with the product being traded many times including at virtual trading hubs or from portfolios.
- The use of certificates as requested by industry[2] is not yet clarified and not fully enabled, despite the Commission's ongoing work on recommendations related to certain high-level criteria for certification. However, implementation of the necessary schemes and suggested controls (e.g., audits) will take time and likely further delay the availability of certification across all relevant exporting countries, for both crude oil and natural gas.

[1] ACER, '2025 Monitoring Report: Analysis of the European LNG market developments': https://www.acer.europa.eu/sites/default/files/documents/Publications/ACER-LNG-Monitoring-Report-2025.pdf
[2] Industry coalition on Methane Regulation, 'Description of principles for solutions addressing the challenge for EU importers to identify the producer of natural gas or crude oil to achieve compliance with the EU Methane Regulation': 1761222136_251015 - DEF2 - EU MR - Industry Coalition solution to address the tracing issue (2).pdf

- The uncertainty linked to penalty schemes and - given the above issues - the significant compliance risk for importers and suppliers is already deterring deliveries into the EU for the period beyond 2027 and can lead to serious security of supply issues and price increases. This applies in particular to crude oil imports because refining operations are designed and optimized around certain crude oil grades/blends and changing supplies will come with a loss of processing capacity, efficiency and flexibility.
- Article 28 is designed to ensure robust methane emissions measurement by producers in preparation for the methane intensity thresholds set by Article 29. Therefore, targeted amendments to the relevant provisions are both urgently needed and justified to ensure that consecutive steps are coherent, proportionate, and practically implementable.
- As fixing the issues via "simple and robust implementation"[3] is impossible because additional rules e.g. on Member State (MS) level cannot simply deviate from EUMR provisions and would lead to many different country-level rules, a relief with legal certainty for all actors to avoid unnecessarily jeopardizing security of supply or competitiveness, can only be achieved via targeted simplification coupled with a stop-the-clock mechanism, to allow comprehensive stakeholder consultations addressing fundamental issues of the EUMR, and allow market participants to operationalize all necessary elements for compliance in a structured, effective, and legally certain manner (e.g., approaches to 'traceability', setting penalties).

Without targeted adjustments/simplification following a stop-the-clock process, a recent study found that by 2027 up to 43% of natural gas volumes and up to 87% of crude oil volumes could be non-compliant.[4] While the EUMR does not formally prohibit the import of non-compliant natural gas and crude oil, the associated legal, financial, and reputational liability risks for EU importers are substantial – particularly in a context where securing sufficient compliant volumes to meet the EU demand as of January 2027 will be extremely challenging. These risks are, therefore, likely to deter imports, reduce production capacity in European refineries and jeopardize the security of affordable energy supply. As the exact impact is hard to determine, the same study used another scenario that considers modifications to EUMR leading to a wider amount of compliant products, which still showed a significant impact on prices, shortening of supply, industry competitiveness, and on the overall EU security of oil and natural gas supply.

Contrary to concerns that amending the EUMR would undermine regulatory certainty, **a limited and well-defined adjustment of the primary legislation, during a period when implementation deadlines are frozen and enforcement of penalties is paused, is precisely what is required to address structural issues and to deliver clarity, consistency, and legal certainty** for operators, investors, and MSs/Competent Authorities (CAs). Whilst we welcome Commission's guidance to MSs/CAs on 'flexible implementation', it will not be sufficient or able to fix the issues from overly prescriptive requirements and unrealistic timelines in the EUMR and comes with the risk of diverging interpretation and application across MSs that can distort the Union markets for crude and gas/LNG.

The proposals set out in the Annex, which have been developed by the undersigned associations, are non-exhaustive and seek to ensure that the importer requirements under Chapter 5 of the EUMR are implemented in a manner that is effective, proportionate, and operationally feasible, without undermining the objectives of the Regulation.

[3] Commissioner Dan Jorgensen's letter to EU Energy Ministers, ahead of the 15 December 2025 Energy Council meeting.
[4] Wood Mackenzie, 2026, 'EU Methane Emissions Regulation – Analysis of Market Impacts': https://iogpeurope.org/projects/the-impact-of-the-eu-methane-regulation/ (up to 114 bcm of natural gas and 9.8 mb/d crude oil may become non-compliant due to importer requirement).

We highlight some of the key proposals:

- Set a conditional, time-bound deferral of Articles 28 & 29 until essential secondary legislation, MRV standards, methodologies, and verification systems are in place, to provide all stakeholders (incl. verifiers) with sufficient time to develop and set up compliance options.
- Revise producer- and country-level MRV equivalency criteria to make compliance achievable whilst using credible, internationally recognized approaches (including OGMP 2.0 Levels 4–5 pathways), while preserving the EUMR's ambition to drive high-quality emissions data and abatement.
- Allow third-party verification at a "limited assurance" level, reflecting current verifier capabilities and ensuring scalability across global supply chains.
- Allow the use of voluntary certification schemes for cases where importers cannot identify the producer of the imported quantities.
- Adjust penalty criteria to reflect the physical and commercial realities of crude oil and natural gas markets (e.g. molecule commingling, crude grade constraints), and the limitations of tracing volumes to producers.
- Introduce grandfathering provisions and clarify the treatment of secondary contracts to preserve legal certainty, market liquidity, and security of supply.
- Anchor the importer definition firmly in the Union Customs Code to ensure legal certainty, consistent enforcement across MSs, and clarity on responsibilities for EU- and non-EU-established entities.

Finally, and regardless of the recommended adjustments, it would be advisable for the European Commission to conduct a thorough impact assessment of the importer requirements, focusing on key criteria such as workability, environmental effectiveness, security of supply and competitiveness.

For more details, please refer to Annex.

Annex

EU Methane Emissions Regulation (EU) 2024/1787: Chapter 5 – Importer Requirements			
Amendment proposals: addressing fundamental implementation challenges			
Nr.	Recommendation	Amendment proposal	Justification
1.	Defer implementation until key preparatory actions are completed.	**Introduce new Article 28a: 'The implementation of Articles 28(1) and 28(2) shall commence from 1 January in the year that is [three] years after the effective date of the implementation of all the necessary actions by the Commission, which shall include the adoption of secondary legislation referred to in Article 28(6), and the establishment of relevant standards referred to in Article 32(1)(a).** **Introduce new Article 29a: 'The application of Article 29(1) shall commence, by 31 May in the year following the implementation of Articles 28(1) and 28(2) and of all the necessary actions by the Commission for implementation of Article 29(1), which shall include the adoption of secondary legislation referred to in Articles 29(4).** **Introduce new Article 29b: 'The application of Article 29(2) shall commence by May 31 in the year that is [three] years after the effective date of the implementation of all the necessary actions by the Commission, which shall include the adoption of secondary legislation referred to in Articles 29(6), and implementation of Article 29(1) and apply to supply contracts concluded or renewed after the application of Article 29(2).**	Several critical compliance elements are still missing and/or will not be available at the scale and in the time required for widespread compliance.[5] While many producers are on a journey to achieve OGMP 2.0 Level 5, the latest report sees only approximately 7% of global oil and gas production at Level 5 and their levels projected for 2027 see significant shortfalls for many countries compared to EU demand from these countries.[6] Operators typically require approximately 4 years to progress from Level 3 to Level 5 reporting, and 2 years to move from L4 to L5. Moreover, OGMP Level 5 is insufficient for compliance as third-party verification by independent accredited verifiers is needed. These efforts are currently hampered by the lack of recognized verification protocols, limited capacity of verifiers to conduct relevant audits and the missing paths for verifiers to obtain accreditation. Importers face growing contractual and operational complexity due to new compliance obligations. As highlighted in ACER's 2025 Gas Monitoring Report, escalating requirements may increase costs, complicate contract negotiations, and limit the range of viable suppliers - with implications for both competitiveness and energy security.[7]

[5] For example: monitoring, reporting, and verification standard (incl. third party verification protocol); methodology for calculating the methane emissions intensity; country-level MRV equivalence procedures; certification or other types of systems applicable to crude and natural gas, globally.

[6] UNEP, 2025, 'An eye on methane' report: https://wedocs.unep.org/items/c98bc5bf-b0d6-4ccf-a497-2f25f624cf1a

[7] ACER, 2025, '2025 Monitoring Report: Analysis of the European LNG market developments': https://www.acer.europa.eu/sites/default/files/documents/Publications/ACER-LNG-Monitoring-Report-2025.pdf

			Therefore, we propose the following: • **A three-year conditional deferral of Articles 28(1)(2), and Article 29(1) after the effective date of implementation of all the necessary actions by the EC**: necessary to allow implementation to align with the availability of essential technical guidance and secondary legislation. This deferral provides the EC time to adopt the necessary implementing measures and for operators to establish data collection and verification systems, as well as to enable the market to operationalise compliance approaches, in particular when it relates to the certification and tracing, in line with the recommendations formulated by the industry[8] (certification). It also helps avoid premature unrealizable enforcement and non-compliance risks, market disruption, and legal uncertainty in energy supply contracts. The measurement standard is a precondition for consistent and credible implementation of Article 28. Without it, operators and verifiers lack a harmonized reference for defining detection thresholds, quantification accuracy, and verification methodologies—creating legal uncertainty and unrealizable enforcement across Member States. • **A three-year conditional deferral of Article 29(2) after the effective date of the implementation of all the necessary actions by the EC and of Articles 28(1)(2) and Article 291(1)**: the proposed three-year transition before methane intensity thresholds become mandatory is justified by

[8] https://www.eurogas.org/wp-content/uploads/2025/07/250709-Action-plan-to-address-the-issues-of-the-importers-requirements-in-the-Methane-Regulation.pdf and https://www.eurogas.org/wp-content/uploads/2025/10/251015-DEF2-EU-MR-Industry-Coalition-solution-to-address-the-tracing-issue-.pdf

			the need for the EC to collect, assess, and benchmark producer-level data. Experience shows that second-year reporting data under OGMP 2.0 and other reporting frameworks demonstrate significant improvements in quality and accuracy. This period will be needed to enable the EC to assess the potential impact of methane intensity values associated with imports as defined in Article 29(5)(6). Only once sufficiently robust and representative data are available – covering the majority of export sources, and using a transparent, consistent methodology – can meaningful MI thresholds be established.
2.	Revise the producer- and country-level MRV equivalency criteria.	Article 28(5): 'For the purposes of this Article, monitoring, reporting and verification measures shall be considered to be equivalent to those set out in this Regulation in the following cases: (a) crude oil, natural gas and coal are subject to independent third party verification equivalent to that set out in Articles 8 and 9 **at a level of limited assurance** and the producer, **in line with definition set by Article 2(28),** established in a third country applies: (i) for crude oil and natural gas, **i)** monitoring and reporting measures ensuring quantification of methane emissions equivalent to those set out in Article 12, or **ii)** monitoring and reporting **of material source-level emissions (such as OGMP 2.0 Level 4), deployment of a site-level technology, and with a process to address material discrepancies between source-level and site-level data~~at OGMP 2.0 level 5~~**; (ii) for coal, monitoring and reporting measures equivalent to those set out in Article 20; or '(b) the third country has in place and applies to producers and exporters established in that third country and supplying crude oil, natural gas or coal to the Union market a regulatory framework **that contains or refers to a protocol** on monitoring, reporting and verification that is **~~at least equivalent to that applied in the Union~~**	For producer-level MRV equivalency: There is currently significant **uncertainty regarding what is required to achieve OGMP 2.0 Level 5** and **whether third-party verification can be delivered** within the EUMR timelines. Since adoption of the Regulation, operators and verifiers have identified several gaps that hinder implementation, including: • Verification capacity: absence of appropriate verification protocols and a shortage of verifiers with the specialized skills required for Level 5. • Methodological clarity: insufficient distinction between Level 3 and Level 4 methods, and unclear procedures for implementing Level 5, particularly reconciliation; • Technical maturity: emerging, not yet standardized, approaches for integrating multi-scale measurements; • Guidance gap: lack of detailed Technical Guidance within OGMP 2.0 to support consistent level determination.

		These protocols should be publicly available and includes requirements for source-level quantification (such as OGMP 2.0 Level 4), deployment of a method for integrating information from site-level technologies, independent verification at a level of limited assurance via regulatory bodies or verifiers, and regular reporting on an annual basis. ~~**in particular, the third country has demonstrated that those monitoring and reporting requirements ensure at least source- and site-level quantification and regular reporting equivalent to those set out in Article 12, for crude oil and natural gas, and in Article 20, for coal, and that effective verification by an independent third party, equivalent to that set out in Articles 8 and 9, as well as effective supervision and enforcement are in place.**~~	These uncertainties undermine the ability of producers to confidently demonstrate compliance. The amendment proposal preserves the core objective of the EUMR which is centred around the need for operators to obtain high-quality methane emissions data through global uptake of MRV practices to support abatement. It does so by: • requiring operators to develop source-level inventories using established and internationally recognized methods, including OGMP 2.0; • promoting deployment of site-level detection technologies to validate the completeness of source-level inventories; • ensuring that verification focuses on evaluating internal procedures to detect, analyze, and resolve material discrepancies between source-level reporting and site-level detection results. Verifiers in the EU have indicated that Level 5 assessments and the emerging field of source-level and site-level reconciliation are likely beyond their current skills sets and would be challenging to scale in the required timeframe. The amendment therefore aligns verification tasks with existing capabilities. Verifiers would review: • the completeness and accuracy of source-level methodologies; • documentation confirming site-level technology deployment; • internal procedures for addressing material discrepancies. In Sum, this proposal enables technically more realistic global uptake and limits the likelihood of trade disputes resulting from the application of the

			EUMR, with very little – or no substantive – reduction in MRV standards and would focus producer efforts more quickly on reducing emissions from their operations. Crucially, it supports a progressive "methane reduction journey," where the focus is on continuous improvement and demonstrated emissions reductions over time, rather than immediate compliance with the most stringent standards, which may not be proven at the scale needed today. Such approach lays the groundwork for a future transition to measurement-informed approaches such as OGMP 2.0 Level 5, without delaying action today. Standards that cannot be implemented across global producers at different stages of their methane management journey today risks those producers seeking alternative markets for their products, limiting the reach of the EU Methane Regulation to a smaller number of global producers. <u>For country-level MRV equivalency:</u> Requirements should be the same as for producer-level MRV equivalency and allow for demonstrating equivalence both by use of Article 12 and OGMP2.0 Level 4 or similar, as detailed in Article 28(5)(a). The country-level equivalency definitions, as proposed, have challenges with an assessment of any individual country, as each third country has adopted unique methane reduction and reporting requirements. This proposal would streamline the approval process for additional frameworks by the Commission and includes more objective criteria against which the Commission could compare other frameworks, including regulatory reporting frameworks. This would also give certainty to third-country governments that are seeking to establish national

			reporting programs aligned with EU requirements on the criteria that would be needed to ensure that their protocol is deemed acceptable by the Commission and focus country efforts on improving inventories to inform methane reduction decision-making within their jurisdictions. Several countries outside the EU have strong regulatory GHG reporting regimes. While these GHG reporting regimes may be structured differently than the EU approach, they have the same intended outcome of collecting and publicly reporting accurate GHG emissions data. National regulatory bodies should be allowed to act as a third-party verifier for purposes of the EUMR, and the data reported to their respective country reporting program should be accepted.
3.	Allow reports to be 3rd party verified, with a 'limited assurance' level.	Article 8(4): 'If, following the verifier's assessment, the verifier concludes with ~~**reasonable**~~ **limited** assurance that the emissions report complies with the requirements of this Regulation, the verifier shall issue a verification statement attesting the conformity of the emissions report and specifying the verification activities carried out. […]'.	Article 8 sets out detailed requirements for third-party verification of reported methane emissions. While independent verification is essential to ensure data credibility, the extensive number of emission sources across often complex value chains makes comprehensive verification highly resource intensive. To ensure proportionality and consistency with related EU legislation, it is proposed that the EUMR specify that third-party verification be conducted at a "limited assurance" level, in line with the approach outlined in the EC Omnibus proposal for the Corporate Sustainability Reporting Directive (CSRD).[9]

[9] EC, 2025 'Proposal amending Directives 2006/43/EC, 2013/34/EU, (EU) 2022/2464 and (EU) 2024/1760': https://commission.europa.eu/document/download/892fa84e-d027-439b-8527-72669cc42844_en?filename=COM_2025_81_EN.pdf

4.	Introduce additional criteria for the imposition of penalties to recognize that imports may not be able to trace the imported volumes to a specific producer in 3rd country.	**Introduce new Article 33(7) (j): <u>'the importer's ability to trace the imported volumes of natural gas, oil or coal to the origin of production;'</u>**	Point (j): Crude oil, natural gas molecules are mixed during transportation and processing, making it nearly impossible to identify their source. This lack of traceability complicates the importer's ability to link imported molecules to specific producers and their assets. This should be addressed in allowing for different possible pathways for compliance.
		Introduce new Article 33(7) (k): <u>'for crude oil, the necessity to import a specific crude grade, for the continued functioning/operation of refining processes;'</u>	Point (k): Refineries are designed and optimized to process specific crude grades that match the technical configuration of their equipment. Each crude oil type has a distinct composition, including sulphur content, density, and contaminants, which affect refining efficiency, product yields, and operating costs. Substituting with a different crude quality can cause imbalances in processing units, equipment fouling, catalyst deactivation, or even safety risks. Therefore, stable supply of the designated crude grade is essential to maintain operational reliability, product quality, and economic performance.
		Introduce new Article 33(7) (l): <u>'availability of third party verification protocols, and their formal acceptance by competent authorities;'</u>	Point (l): In the absence of formally accepted verification protocols, importers have limited ability to demonstrate compliance despite acting in good faith. Existence of harmonized third-party verification protocols is currently lacking. In many exporting countries, verification frameworks are still under development, differ significantly from EU approaches, or are not formally recognized by EU competent authorities.
		Introduce new Article 33(7) (m): <u>'availability of an independent accredited verifier in the exporting country, and of a recognized certification scheme capable of linking producers and importers.'</u>	Point (m): Without access to appropriate verifiers and certification schemes, importers face structural barriers to obtaining verified, auditable data, regardless of their contractual or commercial efforts or operator's efforts in meeting the requirements (e.g., MRV equivalency).

5.	Introduce grandfathering clause.	Article 33(1): '1. Member States shall lay down the rules on penalties applicable to infringements of this Regulation and shall take all measures necessary to ensure that they are implemented. The penalties provided for shall be effective, proportionate and dissuasive and shall include at least: (a) fines proportionate to the environmental damage and impact on human safety and health, set at a level which: (i) at least deprives those responsible of the economic benefits derived from the infringement in an effective way; and (ii) gradually increases for repeated serious infringements; (b) periodic penalty payments to compel operators, undertakings, mine operators or importers to put an end to an infringement, comply with a decision ordering remedial actions or corrective measures, provide information or submit to an inspection, as applicable. By 5 August 2025, Member States shall notify the Commission of those rules and those measures and shall notify it without delay of any subsequent amendment affecting them. **'Penalties applicable to Chapter 5 Articles 28(1)(2), and 29(1) shall only apply to contracts renewed or concluded after the effective dates of implementation of Articles 28(1)(2), 29(1) and should not apply retrospectively.'**	Even in the case of postponement of implementation of said articles of EU MR, sustained uncertainty will remain. This uncertainty will severely hinder the conclusion of long-term contracts as contractual parties will not be able to find consensus on the allocation of associated risks. To exclude long term contracts concluded until the implementation rules are published, will therefore be beneficial to the security of supply of the European Union. As a minimum, should member states that want to encourage long-term contracts be able to apply such grand fathering in their Jurisdiction. Please also see the justification in amendment Nr. 1.
6.	Clarifying treatment of secondary contracts.	**New Article 28a(1): 'For the purposes of this Regulation, any contracts concluded in execution, extension, or partial reassignment of a primary contract shall not be considered new contracts, provided that (i) the primary contract was concluded prior to the date of application of the relevant provisions of this Regulation, and (ii) the new contract refer to the same physical supply terms.** **Such contracts shall retain the compliance status and applicable exemptions of the corresponding primary contract.'**	The term "primary contract" denotes an individual contract to which the MER is directly applicable. The situations referred to in the relevant amending provision - namely extensions, sub-contracts, or reallocation - concern and derive from such primary contracts. In practice, long-term supply agreements for crude oil and natural gas are often executed through a series of secondary contracts - such as extensions, sub-contracts, or reallocations between affiliated entities- without any change to the underlying physical delivery or the original contractual obligations.

			However, under the current wording of the MER, such secondary arrangements risk being classified as “new contracts,” thereby losing the compliance status or exemptions applicable to the protected primary contracts from which they originate. This interpretation would create unnecessary regulatory fragmentation and expose importers to duplicate compliance obligations on the same physical volumes. It would also discourage normal commercial flexibility in contract management, reduce market liquidity, and undermine the stability of long-term supply relationships that are vital for Europe’s energy security. The ‘primary’ contract refers to an individual contract to which the MER effectively applies. The situations referred to in the relevant amendment point (i.e. extensions, sub-contracts, or reallocations) relate to these “primary” contracts.
7.	Clarify ‘*importer*’ definition to ensure legal certainty.	Article 2(59): ‘importer’ means a natural or legal person who, in the course of a commercial activity, places crude oil, natural gas or coal originating from a third country on the Union market **by means of a declaration for release for free circulation within the meaning of Regulation (EU) No. 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code, or the person on whose behalf this declaration is made~~, including any natural or legal person established in the Union appointed to carry out acts and formalities required under Chapter 5;~~**’	The MER should establish a consistent and comprehensive definition of ‘*importer’* in Article 2(59) to address legal uncertainties and administrative challenges related to the placement of goods on the EU market by entities not established in the Union. The definition should be anchored in the Union Customs Code Regulation (EU) 2013/952 and Delegated Regulation (EU) 2015/2446, clarifying that declarant representation can be direct (i.e., when the declarant acts in the name and on behalf of the person represented) or indirect (i.e., when the declarant acts in their own name, but on behalf of the person represented). For importers established in the EU, direct or indirect representation shall apply; whilst for importers not established in the EU, an indirect representation shall apply.

EU Methane Emissions Regulation (EU) 2024/1787: Chapter 5 – Importer Requirements			
Amendment proposals: seeking clarifications, ensuring timely adoption of necessary secondary legislation.			
Nr.	Recommendation	Amendment proposal	Justification
8.	Clarify the methodology for calculating the methane intensity.	Article 29 (4): By 5 August 2027 the Commission shall adopt a delegated act in accordance with Article 34 to supplement this Regulation by setting out the methodology for calculating, at the level of the producer, the methane intensity of the production of crude oil, natural gas and coal placed on the Union market**, in line with definition set by Article 2(28). That methodology shall take into account different production processes, and existing international methodologies and best practice for calculating methane intensity that include co-product allocation.** That methodology shall be non-discriminatory and based on transparent and objective criteria. When preparing such delegated acts, the Commission shall inform the Coordination Group for oil and petroleum products, the Gas Coordination Group, the Electricity Coordination Group and other relevant stakeholders.	The methodology for calculating methane intensity is urgently needed to provide producers and industry with clarity on the parameters that will determine the ultimate methane intensity threshold. This methodology should be developed in accordance with the latest version of ISO 14067:2018 and relevant life-cycle assessment (LCA) standards, ensuring consistency, transparency, and comparability across value chains. As oil and natural gas are often co-produced globally, LCA methods recognize the need to assign emissions between co-produced products. This would ensure a level playing field for producers with different oil and gas mixes and promote EU policy objectives like reductions in the flaring of associated gas in other jurisdiction.
9.	Ensure that sufficient data is available before assessing the potential impact of maximum methane intensity values.	Article 29 (5): ‘’**~~By 5 August 2029,~~ Within 12 months after the availability of at least two consecutive annual methane intensity reports submitted in accordance with Article 29(1)**, the Commission shall assess the potential impact of various levels of maximum methane intensity values associated with crude oil, natural gas and coal placed on the Union market at the level of the producer, and present a report to the European Parliament and to the Council. That report shall include an assessment of the potential reduction of global methane emissions, of the impact on the security of energy supply at Union and national level and on the competitiveness of the Union’s economy, and of the potential global and regional market distortions. That report shall also include a market assessment with regard to the methane intensity of current and future supplies to the Union **~~until 2049~~** through both long-term contracts and spot purchases. That assessment shall analyse the situation per Member State, taking into account contractual commitments entered into before 4 August 2024, energy infrastructure capacities and potential constraints.’’	An impact assessment of potential impacts of methane intensity values is needed, with sufficient data. Therefore, the impact assessment referred to in Article 29(5) shall consider at least two years of methane intensity reports in accordance with Articles 29(1) and 29(2) and may therefore happen later than 5 August 2029. Please refer to further justification in amendment Nr. 1. The reference to the 2049 sunset date originally stemming from the Gas Directive should also be removed: it has yet to be fully clarified to what it refers to.
10.	Adopt the country-level MRV equivalence	Article 28(8): ‘From 4 August 2024, where appropriate and subject to the applicable procedures, the Commission shall propose and aim for	The MER should be amended to strengthen Article 28 by requiring the EC to establish structured

	procedure and decisions without delay	the Union to enter into cooperation frameworks with third countries from which the Union imports crude oil, natural gas or coal **by 1 January 2027; and (ii)** support them in establishing a monitoring, reporting and verification system equivalent to that established in this Regulation. The Commission shall not recommend entering into such cooperation frameworks where those frameworks would circumvent restrictive measures adopted under Article 215 TFEU on the import of crude oil, natural gas or coal.'	dialogues with major energy partners and to report on progress within defined timelines, ensuring that country-level MRV equivalence becomes a credible and operational mechanism rather than a theoretical option.
11.	Clarification amendment seeking partial deletion to recognize challenges for crude oil and natural gas imports due to the complexity of tracing supply chains, limited data availability, and the administrative burden on importers.	Annex IX point 2: 'exporting third countries ~~**and regions**~~, as classified in the Union nomenclature of territorial units for statistics (NUTS) level 1, where the products were produced~~, and countries and regions, as classified in the NUTS level 1, through which the products were transported before they were placed on the Union market~~;'	Maintaining wording in point 2 risks non-compliance from third countries, potential trade disruptions, and misalignment with international standards, impacting market competitiveness and energy security. For additional details, please see justification in amendment Nr. 1.
12.	Ensure structured engagement with 3rd countries.	**Introduce new Article 28b: ''Ahead of and in the course of the completion of all obligations related to the implementation of Article 28 as a whole, sufficient notice must be given by the EU Commission to exporting third countries, including in the context of the cooperation frameworks outlined under article 28(8), to facilitate their adaptation to the monitoring and reporting requirements established under Articles 8, 9 and 12. Additionally, the possibility to obtain MRV equivalence must be ensured, provided that the majority of producers in a given third countries are on a clear path to achieve OGMP 2.0 Level 4 .''** **Introduce new Article 29d: "Ahead of and in the course of the completion of all obligations related to the implementation of Article 29 as a whole, sufficient notice must be given by the EU Commission to exporting third countries to ensure their adaptation to the future methane intensity calculation methodology as well as to the maximum methane intensity values specifying different classes for crude, gas and coal, considering different sources, production processes and site conditions, to safeguard security of supply of these commodities to the EU."**	In the spirit of the EU commitment highlighted in the EU MR Article 28(8), cooperation and collaboration with third countries is critical. It will be necessary to provide sufficient time to third countries to adapt to the IA on MRV equivalence, especially considering the high percentage of reliance on countries that are at risk of not prioritize measures to reduce methane emissions, both for gas and crude. "Ahead of" means as soon as possible prior to the new implementation date of for Article 28 (1) and (2) and for Article 29 (1). "In the course of" means that the process must be collaborative and transparent so that third countries are able to provide comments and participate in discussion.

13.	Protecting equivalent producers	Article 28(6): 'Equivalence may be revoked at any time by the Commission, by means of an implementing act, where the third country no longer complies, in law or in practice, with the conditions set out in paragraph 5, point (b), of this Article during a period of at least 12 months. That implementing act shall be adopted in accordance with the examination procedure referred to in Article 35(3). Prior to adopting that implementing act, the Commission shall notify the third country of its concerns and give it an opportunity to state its views. **In case equivalence of a given third country is revoked, this does not affect the equivalence demonstrated by its national producers.'**	In case country equivalence is prevailing over producers' equivalence – a point to be explicitly clarified by the EC – it should be made sure that the equivalence of its national producers is not tied to it.
14.	Clarify '*producer*' definition.	Article 2(58): 'producer' means an undertaking which, in the course of a commercial activity, produces crude oil, natural gas or coal, by extracting it from the ground in a licensed area, processing it or conveying it ~~**through connected infrastructure**~~ within that licensed area;	The definition of producer should cover specifically the upstream activities within a licensed area.
15.	Seek clarity on timeline related to reporting of elements in Annex IX.	Article 27(1): By 5 May 2025 and by 31 May every year thereafter, importers shall provide the information set out in Annex IX to the competent authorities of the Member State in which they are established. **The reporting requirement shall not apply before the date of entry into force of the corresponding obligation**. Where importers fail to provide that information, in whole or in part, they shall provide sound justification to those competent authorities for such failure and set out the actions that they have undertaken to obtain that information.	This specification is required to avoid any misunderstanding of the current text, specifying the timeline for the reporting of Annex IX elements. Such requirements should also be reflected in a unified template for reporting Annex IX info, to be adopted by all Member States Competent Authorities.