

Brussels, 19 June 2026
(OR. en)

10728/26

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NOTE

From: General Secretariat of the Council
To: Delegations

Subject: AOB for the meeting of the Transport, Telecommunications and Energy
Council on 26 June 2026
Impacts of the Methane Regulation on the EU energy security
- Information from the Czech Republic and Slovakia

Impacts of the Methane Regulation on the EU energy security

This note outlines shared concerns among several Member States regarding the timely and proportionate implementation of Regulation (EU) 2024/1787 on methane emissions in the energy sector (EUMR). While fully supporting the objective of reducing methane emissions, we consider it necessary to introduce carefully targeted adjustments, including a **postponement of EUMR obligations by at least three years**.

Rationale: Geopolitical pressure on natural gas and crude oil markets

Ongoing instability and limited availability of certain natural gas and crude oil sources from the Middle East have tightened global energy markets. These constraints are expected to persist and may affect European supply during the filling season and even in the upcoming winter periods or peak demand events. In this context, it is essential that EUMR implementation does not unintentionally restrict access to diversified gas and crude oil sources.

Short-term risks of immediate EUMR enforcement

A rigid application of import-related obligations could lead some producers—especially those without advanced methane monitoring systems—to reduce or temporarily suspend deliveries to the EU. This would:

- narrow Europe’s supplier base at a time of heightened global competition;
- increase the risk of redirected LNG and crude oil cargoes to more permissive markets;
- reduce the EU’s flexibility to balance short-term supply gaps linked to Middle Eastern disruptions;
- increase prices of natural gas, crude oil, and refined products, adversely affecting European households and undermining industrial competitiveness.

Shortcomings of the recommended penalty waiver

The recently published Commission Recommendation 2026/XXXX (the Recommendation), which advises Member States not to apply penalties for three years in relation to infringements by importers for contracts concluded by the end of 2027, does not improve the precarious situation for importers because it does not alter the underlying legal obligations, and leaves major commercial, operational and enforcement uncertainties unresolved:

- The Recommendation is non-binding and does not remove significant legal uncertainty for importers negotiating long-term supply contracts.
- national authorities and courts may interpret or apply the Recommendation differently across the EU, especially in view of some vaguely defined concepts contained in it;
- the Recommendation does not eliminate the risk of future judicial reinterpretation or retrospective enforcement. Even if competent authorities initially apply a flexible approach, companies remain exposed to later legal challenges;
- the Recommendation assumes importers can continue operating while accepting a degree of non-compliance risk. In fact, many importers cannot knowingly sign contracts where compliance with EU law is uncertain due to governance, reputational, financing and litigation exposure.

Benefits of a time-limited postponement

A targeted postponement of at least three years would:

- ensure continued availability of natural gas and crude oil from diversified sources;
- preserve the EU's bargaining position and avoid price increase triggered by regulatory-driven constraints;
- allow suppliers time to upgrade monitoring and reporting systems;
- allow time to establish and make operational third party verification protocols, verification capacities, legal mandates and procedures for accreditation of third party verifiers, certification across the key regions applicable to gas and oil;
- allow time for EC to develop all relevant secondary legislation;
- support a stable market environment while maintaining the EU's long-term methane-reduction commitments, in line with **European Council** conclusions.

This approach maintains the Regulation's environmental ambition while ensuring proportionality and feasibility.

Member States supporting this non-paper invite the European Commission to **consider as a matter of urgency all available options to reduce barriers to natural gas and crude oil imports, including, but not limited to**

1. **Targeted amendments to postpone the application of the obligations under Chapter V of EUMR by at least three years**, allowing sufficient time to develop the necessary third-party verification methodologies and capacities, ensure availability of relevant technologies and services (e.g., certification schemes), and support compliance by third-country operators.
2. Assessment of the impact of import-related provisions on short-term supply security and avoid unintended market disruptions and overall assessment of the administrative, technical and financial impact of EUMR application.
3. Working closely with Member States and relevant stakeholders to ensure the Regulation is implemented in a technically achievable, proportionate and energy-secure manner.

4. Begin assessment of the Regulation and preparation of any additional amendments that follow the EU Simplification Agenda, and should be incorporated through earlier review of the EUMR in 2027.

A coordinated, time-limited postponement of EUMR obligations is essential to ensure effective and harmonized implementation while safeguarding the EU's energy security during a period of heightened geopolitical uncertainty. This approach preserves the environmental integrity of the Regulation, offers legal and operational clarity, and maintains stable access to diversified natural gas and crude supplies until current supply risks subside. It should also ensure that the proposed measures apply in a balanced and non-discriminatory manner to both domestic (EU) and external economic operators, thereby preserving a level playing field, while recognizing the role of domestic production in contributing to price affordability and overall energy system resilience.
