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## NOTE

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From: General Secretariat of the Council  
To: Delegations

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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 Austria, Belgium, Bulgaria, the Czech Republic, Hungary, Italy, Lithuania, the Netherlands, Poland, Romania, Slovakia and Sweden

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### *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). We fully support the EU's climate ambitions and the objectives of the EUMR. At the same time, we consider it necessary to introduce carefully targeted adjustments, including a **postponement of the application of those EUMR obligations, whose implementation is currently not feasible, by three years, subject to regular review to ensure that it remains justified**. To secure security of supply, it is important to ensure that all legal risks are effectively excluded. In the meantime, it is important to continue working towards compliance.

## **Rationale: Geopolitical pressure on natural gas and crude oil markets**

Ongoing geopolitical instability, global market volatility 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 recommendation currently considered by the Commission not to apply penalties for three years in relation to infringements by importers for contracts concluded by the end of 2027, is a welcome step forward but remains insufficient to address 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 therefore 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;

- 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, financing and litigation exposure.

### **Benefits of a time-limited postponement**

A targeted postponement of those EUMR obligations, whose implementation is currently not feasible, for 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 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;
- maintain reliable cross-border energy flows and contribute to the resilience of the European energy system;
- support a stable and predictable 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 note thank the European Commission for its work on the recommendation, which they consider a first step in the right direction. We invite the European Commission to **consider as a matter of urgency all available options to reduce barriers to natural gas and crude oil imports**. In particular:

- 1. Targeted amendments to postpone the application of the obligations under Chapter V, article 28 of EUMR by three years should be introduced**, allowing sufficient time to develop the necessary third-party verification methodologies and capacities, publish the delegated acts establishing relevant reporting methodologies, 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 in order to avoid unintended market disruptions and overall assessment of the administrative, technical and financial impact of EUMR application.
- 3. Implementation dialogue based on close cooperation** with Member States and relevant stakeholders to ensure the Regulation is implemented in a technically achievable, proportionate and energy-secure manner that recognizes challenges faced by all relevant actors in the supply chain, including Union-based oil and gas operators.

A coordinated, time-limited and targeted postponement of those EUMR obligations whose implementation is currently not feasible 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 oil 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.