

Comments on the EU Methane Strategy Roadmap

The Clean Air Task Force welcomes DG Energy and the European Commission's efforts to mitigate methane emissions, especially from the oil and gas sector. The EU methane roadmap, the subsequent methane strategy, and the implementing policies and measures, are an opportunity for Europe to both reduce its own domestic methane emissions as well as an opportunity for the EU to create a globally leading policy to address methane emissions from oil and gas imported into the EU.

Global methane emissions have increased by 50 million metric tons per year since 2000 – a deeply alarming trend, as this additional methane will have similar climate implications over the coming decades as the CO₂ emissions from all US power plants, transportation, and residential and commercial heating combined.¹ Emissions from fossil fuel production reportedly contributed more than 30 percent of the total. In other words, methane emissions from fossil fuels have increased by approximately 16 million metric tons in the past 20 years. Fortunately, reining in methane from the oil and gas industry, the pollutant's largest industrial source, is feasible and cheap. It can be accomplished through basic equipment maintenance, good operating practices for drilling, transport, and storage of oil and natural gas, and better compliance planning. According to the International Energy Agency, half of today's methane emissions can be cut at no net cost, and three-quarters can be cut with existing technologies.²

The Roadmap states that the intention is to “tackle methane emissions throughout the energy supply chain” thus contributing to Europe's goal of becoming climate neutral. To be truly carbon neutral, Europe must cut the methane emissions both from any oil and gas produced in the Union and from imported oil and gas to near zero. Currently Europe is the largest importer of natural gas in the world and one of the largest importers of oil. Implementing best in-class standards for emission reductions throughout the domestic gas industry, from production to distribution, is a relatively straightforward policy to develop, as described above; there are numerous precedential policies from around the world that can serve as models for how to effectively address domestic methane emissions. Critically, however, the EU must go further, by developing a novel policy to address the emissions from any imported gas or oil. This policy development is of paramount importance to ensure that the EU can reach its carbon neutral goal and will contribute to emission reductions around the globe.

The roadmap also states, “In the energy sector, leak detection and repair programs, as well as finding and addressing ‘super- emitters’ can be a very effective action.” CATF agrees with the European Commission on the importance of implementing Leak Detection and Repair (LDAR) programs and reducing emission from super-emitters. However, CATF observes with concern the following statement, “Such policies (sectoral policies) will focus on, but will not be limited to, better measurement and reporting at private and sectoral entity level in the EU before stricter policy responses can be designed”. This approach delays emission reductions that are desperately needed right now, disregards the positive effects reducing methane emissions has in the short run, and is out of line with the many jurisdictions that have acted to aggressively mitigate methane pollution *despite imperfect information about the quantity of emissions*.

¹ Jackson, R B, et al. (2020) “Increasing anthropogenic methane emissions arise equally from agricultural and fossil fuel sources.” Environmental Research Letters. Vol. 15, 071002. <https://doi.org/10.1088/1748-9326/ab9ed2>.

² International Energy Agency, Methane Tracker 2020. Available at: <https://www.iea.org/reports/methane-tracker-2020/methane-abatement-options#abstract>.

North American jurisdictions (Canada, federal and provincial; US, federal and state; Mexico, federal) have been moving forward on methane abatement for ~10 years, with success, while research has been ongoing, and debate has continued in academic circles about the exact level of methane emissions. In the US, LDAR is mandatory at all new and modified facilities nationwide, and is required by law at a broader set of sites in many states, along with stringent application of other best practices to dramatically reduce methane emissions. Even jurisdictions that have already enacted strong methane regulations are still learning more about emissions from the oil and gas sector. For example, the U.S. state of Colorado enacted the first ever VOC/methane regulations for the oil and gas industry in 2014 using the best available information it had at the time. In the years since, the state has continued to learn more and study its emissions from its oil and gas industry, and it has progressively tightened its standard using this new information. Implementing LDAR programs now, combined with required reporting on the results of LDAR inspections, will greatly increase the understanding of the emissions inside the EU.

CATF encourages the European Commission to include the following essential actions in the methane strategy for oil and gas:

1. Mandatory Leak Detection and Repair - for the entire domestic oil and gas supply chain.
2. Rapid retrofit / replacement of outdated equipment that by design vents methane.
3. Strict standards to rapidly eliminate venting and ramp down flaring from oil and gas wells.
4. Standards to minimize venting during well, pipeline, and station maintenance.
5. Mandatory reporting of detailed data from leak surveys, equipment and component counts for venting sources, and oil well venting and flaring volumes.
6. Implement systems for monitoring for compliance, reporting of emissions, and verification of data for both domestic sources as well as a system of MRV for supplier countries.
7. Commit the EU to a clear, defined-timeline process for the development of legally binding import standards, border adjustment taxes, or other economic structures which will effectively leverage the EU's buying power to substantially reduce methane emissions associated with the production, processing, and transport of gas in non-EU producing nations.