

President Ursula von der Leyen
President of the European Commission
Rue de la Loi / Wetstraat 200
B-1049 Brussels, Belgium

CC: Executive Vice-President Teresa Ribera, Executive Vice-President Stéphane Séjourné, Commissioner Dan Jørgensen, Commissioner Dombrovskis, EU Energy Ministers

25 June 2026

Dear President von der Leyen,

On behalf of the undersigned organizations, we are writing to urge the European Commission to hold the line against attempts to weaken, reopen, or postpone Chapter V of the EU Methane Regulation (EUMR) at this week's Transport, Telecommunications and Energy (Energy) Council. We welcome the European Commission's [23 June joint statement](#) with the United Kingdom and Canada,¹ reaffirming that methane abatement is a pillar of energy security and ask that the Commission adheres to the goals it sets forth by protecting Europe's most concrete means of driving methane abatement.

A non-paper put forward by the Czech Republic and Slovakia, supported by 9 other EU Member States and industry groups, calls for a three-year legislative postponement of core importer requirements. Reopening or postponing this regulation agreed by co-legislators would be a disproportionate and counterproductive response to temporary administrative hurdles, effectively neutralizing Europe's global leverage on climate and methane reduction until 2029.

The administrative and market concerns being raised to justify this delay are factually flawed and can be resolved through immediate Commission guidance, without altering the legislative text:

- **Implementing acts and secondary legislation are not a bottleneck:** The non-paper argues that the absence of secondary legislation under Article 28(6) regarding MRV equivalency creates a compliance bottleneck. This is legally incorrect. No third country is currently presumed to have regulatory equivalency. The baseline obligations under Articles 27 and 28 provide two other pathways for MRV equivalency (at the producer level by either meeting Article 12 or OGMP 2.0 Level 5), which do not require implementing acts to function. For the purpose of reporting, importers can ensure compliance by requiring producers to meet these standards and share their empirical data.²

¹ See also: UN Secretary General Antonio Guterres published a statement on 23 June calling for immediate action on methane. [Available here.](#)

² The EUMR's importer obligations under Articles 27 and 28 do not require additional implementing acts. The methane intensity methodology delegated act, which is due in 2027, will set forth new reporting obligations in 2028 for the forthcoming methane performance standard.

- The key challenge regarding verification is administrative and easily resolved:** National Accreditation Bodies (NABs) are hesitating to accredit independent verifiers because they lack an approved EU framework for Article 12 verification that satisfies the requirements of Articles 8 and 9. The Commission has the explicit authority under Article 8 (3) to provide guidance on verification activities.³ By issuing a Commission guidance indicating that the criteria are met by an existing international standard, such as the [Energy Emissions Modelling and Data Lab \(EEMDL\) protocol](#), the Commission can give competent authorities and NABs the certainty to unlock the accreditation pipeline within months, not years.
- Energy security claims contradict market reality:** The non-paper makes incorrect statements about cost and energy security impacts that rely on false assumptions that large volumes of fuels will require strict traceability requirements. The European Commission has clearly communicated that it will not apply these traceability requirements,⁴ rendering the conclusions of the Wood Mackenzie study invalid.⁵ Rystad Energy finds that global OGMP 2.0 Level 5 volumes are expected to be three times EU demand by 2027.⁶ Separate energy security concerns regarding cost impacts are overstated. Independent modelling by Rystad Energy shows that a phased EUMR performance standard will cost an average of just €0.07/MMBtu for gas and €1.33/barrel for oil,⁷ costs that are an [order of magnitude lower](#) than standard geopolitical price volatility⁸ and entirely negligible to global suppliers.⁹

Allowing a legislative rollback would reward historical inaction by international producers, penalize the proactive operators who have already invested in robust monitoring, and leave EU domestic producers operating on an unequal playing field. Furthermore, it would undermine the very [legal certainty](#) that companies wish to strengthen.

³ Article 8 (3) of the EUMR instructs competent authorities to take due account of guidance issued by the Commission with respect to verification activities. This is particularly relevant in the transitional period laid out in Article 8 (2) for verification of measurement and reporting according to Article 12 before technical prescriptions are established in accordance with Article 32.

⁴ At the Eurogas Annual Conference, former DG ENER Director General Ditte Jørgensen clarified that strict physical or molecule-tracing would not be required under the EUMR. See also, CATF. "Why claims that EU Methane Regulation threatens energy security supply miss the mark." April 2026. [Available here](#).

⁵ International Association of Oil & Gas Producers (IOGP), supply modelling EUMR impact commissioned from Wood Mackenzie. [Available here](#).

⁶ Rystad Energy and EDF, "EU energy security considerations in light of EU MER & the Middle East conflict," June 2026. Global availability of OGMP 2.0 Level 5 volumes is expected to be threefold EU import requirements in 2027 for both oil and gas. [Available here](#).

⁷ CATF and Rystad Energy. "Impact of an EU Methane Import Performance Standard: Impact Assessment." November 2023. [Available here](#).

⁸ Data also shows that cargo diversion shipping costs to Asia via the Cape of Good Hope exceeded \$3-4/MMBtu, more than 50 times the modelled EUMR compliance costs. Data also shows that long-term supply agreements have not been impeded by the EUMR since 2024, with multiple long-term contracts agreed by Venture Global with ENI, SEFE, Naturgy and Atlantic-SEE. For more see: CATF. "EU Methane Regulation Penalties: Why proportionate, phased penalty regimes pose no energy security risks." June 2026. [Available here](#).

⁹ A new assessment by DataDesk shows that the EU is unlikely to face a gas shortage because of the Methane Regulation in 2027, as most gas contracts are grandfathered, global LNG supply is growing strongly, more producers are joining methane-reporting initiatives, and Europe's gas demand is declining. [Available here](#).

We urge the Commission to reject any reopening or early review of the EUMR at the Energy Council, as called for in [the joint CSO letter signed by nearly 30 organisations on 10 June](#). Instead, we recommend a proportionate, administrative path forward:

1. **If temporary penalty flexibility is considered necessary, it should be strictly limited to one year and to Article 28, accompanied by a review of market conditions and supported by a transparent assessment of any actual security of supply risks.** Any suspension recommendation should be reviewed within one year or automatically withdrawn, and legal obligations to comply should not be removed.
2. **The European Commission should urgently issue transitional guidance on independent third-party verification,** recognizing the EEMDL verification protocol as an appropriate internationally aligned methodology for conducting Article 12 verification activities, to unblock the European verifier accreditation pipeline. This is consistent with the competence established in Article 8(3) of the EUMR.
3. **Encourage Member States to establish clear, phased, and predictable national penalty regimes by the end of 2026** to provide industry with long-term economic certainty, and enable companies to price the benefits of compliance to secure early capital investments in methane mitigation.

The EU has the tools to deliver regulatory clarity without delay and strengthen energy security while upholding its climate leadership. The undersigned organisations look forward to supporting the Commission in ensuring the successful and timely implementation of this critical regulation.

Signed:

1. Jonathan Banks, Vice President, Methane, Clean Air Task Force
2. Britt Dam, Senior Advisor for Climate and Energy, Green Transition Denmark
3. Mihai Stoica, Executive Director, 2Celsius
4. Nika Murzynova, Expert on Energy Transition, Centre for Transport and Energy
5. Juraj Melichar, Senior Coordinator, Friends of the Earth-CEPA, Slovakia
6. Dana Mareková, Coordinator, Klima Fokus
7. Mary Rice, Executive Director, EIA UK
8. Chiara Martinelli, Director, CAN Europe
9. Durwood Zaelke, President, Institute for Governance & Sustainable Development
10. Michał Hetmański, CEO and Co-founder, Instrat
11. Morgane Créach, Director, Réseau Action Climat France
12. Colin Black, Executive Director, Center for Climate Crime Analysis
13. Lauren Pagel, Policy Director, Earthworks
14. Mario Rodríguez, Public Policy Director, Fundación Ecología y Desarrollo (ECODES)
15. Monica Tommasi, President, Amici della Terra
16. Ismael Morales, Head Climate Policy, Fundación Renovables.
17. Sascha Müller-Kraenner, Executive Director, Deutsche Umwelthilfe (DUH)
18. Diana Maciąga, Coordinator and Expert on Gas, Polska Zielona Sieć
19. Katarzyna Wiekiera, Climate Campaigner, Workshop for All Beings (Pracownia na rzecz Wszystkich Istot), Poland

20. Helen Spence-Jackson, Executive Director, Europe, Environmental Defense Fund Europe
21. Theodota Nantsou, Head of policy, WWF Greece
22. Alex Galinos, Executive Director, Organization Earth, Greece
23. Constantinos Machairas, General Secretary, IFOAM Organics Mediterranean
24. Laura Nazare, Campaign Director, Bankwatch Romania
25. Kajsja Pira, Programme Director, AirClim Sweden
26. Mariagrazia Midulla, Head of Climate and Energy, WWF Italy
27. Christopher Lambin, Head of Data Investigations, Global Witness
28. Jérémie Suissa, CEO, Notre Affaire à Tous

