

October 2026

Response to the proposed delay in EUMR implementation

Clean Air Task Force (CATF) is deeply concerned about the European Commission's proposal^{1,2} for a one-year delay to the EU Methane Regulation's (EUMR) importer monitoring, reporting and verification (MRV) requirements.

The evidence does not support claims that financial risks warrant a delay.

There is no compelling case for postponement: the Commission's recommendation is already to suspend penalties during the initial implementation period³, substantially limiting companies' immediate enforcement exposure. The evidence presented to date does not show that prospective penalties are large enough to alter trade-routing decisions. The more immediate obstacle to contracting has been the absence of clear national penalty regimes, which prevents both contractual counterparties from pricing the consequences of inaction and allocating responsibility with confidence.

Legal risks: No indication or precedent to make legal risks a reason for delay.

The Carbon Border Adjustment Mechanism (CBAM) experience illustrates how some industry concerns, while not unfounded, are often overstated relative to their actual impact. CBAM followed a similar timeline to the EUMR, as the definitive framework began applying from 1 January 2026, but no CBAM verifiers had yet been accredited. The first accreditations were only expected around September 2026, with verification reports to be issued from January 2027 ahead of the first annual declarations in September 2027. For the EUMR, importer requirements will begin in January 2027, but reports won't be due until May 2028.

Rather than delaying the implementation, the European Commission sequenced accreditation, registry access and verification. Although companies expressed concerns about compliance challenges, those concerns did not appear to translate into requests for a delay driven by fears of legal action. The absence of accredited verifiers at the outset was therefore treated as an implementation challenge to be managed, not as a reason to reopen the legal timetable.

Similarly, the temporary absence of methane verifiers should be addressed through clear guidance from the Commission and Member States on implementation of the sound justification provision in Article 27(1), which is referenced in Article 28(1) and Article 29(1), not a broad postponement.

Where non-compliance results from a technically defensible constraint, and the absence of accredited verifiers would be one, and an importer can demonstrate reasonable efforts, transparent disclosure and a credible remediation plan,

¹ Initiated by France with "Regulation on the reduction of methane emissions in the energy sector: a targeted one-year postponement of importers reporting requirements". Non-paper from FRANCE, reported by Contexte on Sep 24.

² Press conference, September 30, 2026. Available [here](#)

³ Recommendations on the application of penalties". European Commission, July 20, 2026. Available [here](#)

the actual probability and magnitude of litigation, enforcement or reputational harm is low, as it is clearly stated in Article 28(2)⁴.

Reputational risks: The potential financial gains would likely overshadow reputational risks and incentivise companies to find a solution.

Industry's own account of the commercial consequences also calls its reputational risk claims into question. The Wood Mackenzie study⁵ being used by industry to exemplify risks and support the delay assumes that substantial volumes of oil and gas would become non-compliant. Although not financially penalised, importers *"would still be exposed to risks to their reputation, corporate governance and future legal challenges."*⁶

The same study argues that non-compliance would drive almost 100 bcm of LNG imports annually to be rerouted to Asia, causing European Title Transfer Facility (TTF) prices to rise sharply while Japanese Delivered Ex Ship (DES) prices would fall. Assuming a price spread of US\$10/MMBTU, this would imply that oil and gas companies were prepared to forgo approximately US\$108 billion (minus some costs – transport, terminal, etc.) in marketed gas over three years⁷ in order to avoid the unsubstantiated and unquantified reputational exposure.

Going Forward: Recommendations for a delayed but not weakened implementation.

For these reasons, CATF does not consider a delay necessary. Nevertheless, the Commission has publicly stated its intention, and if realised, it should be paired with clear conditions. The Commission has consistently stated that the proposed one-year delay is intended to facilitate implementation, not weaken the Regulation. However, the political risks of reopening implementation timelines should not be underestimated.

The greatest concern is not the one-year delay itself, but what may follow. Once implementation deadlines are reopened, there is a real risk that industry actors and Member States that have long opposed the Regulation will seek further concessions, additional delays, or broader revisions. A targeted adjustment could quickly become pressure for wider weakening. These concerns are aptly illustrated by industry representatives' swift reaction: an immediate attempt to further impede implementation by calling for an even longer (3-year) delay⁸.

If the Commission proceeds with a legislative amendment, the delay must remain strictly limited to the importer MRV start date, preserving all future obligations and milestones and explicitly precluding further delays. The current bottleneck is specific: Member States have not endorsed verification protocols, leaving National Accreditation Bodies without a common basis for accrediting independent verifiers. Existing verification protocols, such as the [EEMDL Verification Protocol](#), already provide a practical pathway forward, and with IMEO close to releasing its own verification guidance to verify conformity with OGMP 2.0 Level 5, the challenge is one of implementation and not one of regulatory design.

A one-year delay should therefore be used solely for implementation, not political manoeuvring. Accordingly, acceptance of the proposed delay should be strictly conditional on:

- **Establishing accreditation pathways for verifiers.** Competent Authorities should recognise candidate verification protocols and communicate this to their National Accreditation Bodies (NABs) before the end of 2026.

⁴ "... in case of failure [to fulfil the MRV requirements] *provide sound justification to those competent authorities for such failure and set out the actions that they have undertaken as part of those efforts*". EU Regulation 2024/1787, Article 28(2). Available [here](#).

⁵ The impact of the EU methane Regulation, Wood MacKenzie, commissioned by IOGP Europe and Concawe. Key findings available [here](#).

⁶ Joint industry reaction and recommendations EU Methane Regulation – DG ENER Recommendations, IOGP, 1 September 2026. Available [here](#).

⁷ Assuming, for simplicity, 36 million MMBTU per bcm of gas: $300\text{bcm} \times 36 \times 10^6 \text{MMBTU} \times 10\$/\text{MMBTU} = \$108 \text{ billion}$

⁸ "EU Methane Regulation: an actionable regulatory framework that preserves energy security, affordability and emission reductions". 8 October 2026. Available [here](#).

- **Finalising verification procedures.** NABs should issue a call to start accreditation, aiming to accredit verifiers by mid-2027.
- **Recognising certification schemes and compliance solutions.** Member States should recognise certification schemes and compliance solutions that satisfy the conditions set out in [Commission recommendation 2026/1834](#) and its Annex by the end of 2026.
- **Adopting scaled penalty regimes.** Competent Authorities should determine penalties for non-compliance, as well as the timing of their implementation and scaling. A proposal should be ready before the end of 2026, with formal adoption by mid-2027. Similarly, reasonable-efforts and sound-justification provisions should be put forward by Member States to provide clarity and avoid different interpretations.
- **Strengthening competent authority capacity.** Relevant Ministries should ensure adequate resources and cooperation between Competent Authorities to build capacity for implementation, specifically technical capacities to evaluate emissions reports and verification statements ahead of the entry into force of MRV requirements in January 2028.

This is in line with the Commission's July recommendations^{9,10}. If this regulation is to succeed as an important energy and climate policy, Member States should remain committed in moving implementation forward over the course of the next year.

The successful implementation of the EUMR requires Member States to demonstrate leadership by working closely with the Commission, accreditation bodies and other States to resolve remaining technical and political bottlenecks. Action on methane is the fastest way to reducing harmful global warming that is already causing tangible impacts, including the hottest European summer since records began¹¹.

The credibility of the proposal will ultimately be judged by outcomes. A targeted amendment and delay can only be justified if it delivers a measurable and predictable path towards implementation. Any proposal that extends beyond this narrow adjustment would risk undermining regulatory certainty and investor confidence. It cannot become a pathway to indefinite postponement.

⁹ "Recommendation on compliance solutions and optional model clauses". European Commission, July 2026. Available [here](#).

¹⁰ "Recommendations on the application of penalties". European Commission, July 20, 2026. Available [here](#).

¹¹ "Summer of 2026 broke records in Europe, and caused deaths". DW, September 19, 2026. Available [here](#).