

# Methane Transparency as a Pillar of EU Energy Security

Dear President von der Leyen,  
Dear President Antonio Costa,  
Dear Heads of State,

Cc: Commissioners, Energy Ministers,

We write as civil society organisations working on energy transition, climate mitigation and environmental protection to strongly support the timely and faithful implementation of the [EU Methane Regulation](#).

Europe faces energy security risks, driven by geopolitics, infrastructure exposure and dependence on volatile fossil fuel markets. These risks affect supply reliability, price stability and investment confidence. In this context, regulatory stability is essential to energy security. The war in the Middle East is another reminder that Europe's dependence on imported fossil fuels remains a core vulnerability for its energy security. The EU Methane Regulation adopts a phased implementation approach designed to avoid market disruption. It allows suppliers to continue accessing the European market while progressively improving methane performance, ensuring EU energy security.

The EU's decarbonisation strategy is its core long-term energy-security strategy, and the Methane Regulation is an essential element of that approach. Reopening or delaying the Regulation would add uncertainty at a moment when the energy system is already under strain and would undermine the investor's confidence in the Regulation as a means to mitigate key portfolio risks and support decarbonisation objectives. As the Commission considers how best to apply the Regulation in practice, maintaining a clear and predictable implementation pathway is essential to avoid destabilising signals to markets and international partners. At this stage, implementation, not renegotiation, is the only credible option. In this context, it is essential that upcoming guidance on penalties and on measurement, reporting and verification (MRV) and tracing is robust and upholds the effectiveness of the Regulation in practice.

## **Methane transparency strengthens energy security**

The Methane Regulation improves transparency in oil and gas supply chains, allowing buyers and policymakers to compare suppliers, identify weaknesses and limit reliance on opaque sources. In volatile markets, this transparency matters as much as access to supply itself.

The Regulation should be understood not only as a climate law, but also as a tool for infrastructure governance and market risk management. Transparency also supports fair competition by ensuring that suppliers operating in the EU market are assessed using comparable and credible data.

## **Reducing upstream gas waste supports EU energy-saving efforts**

Across Europe, citizens and businesses are being asked to [reduce energy use](#). At the same time, large volumes of gas are still lost upstream through venting, flaring and avoidable leaks. Methane emissions are wasted gas.

Reducing these losses is one of the fastest and most cost-effective ways to improve efficiency and strengthen energy security without increasing imports or burdening consumers.

The [International Energy Agency](#) estimates that methane abatement could have made nearly 100 bcm of gas available to markets in 2024 – a meaningful volume in today's tight market, comparable in scale to Qatar's annual LNG exports. Recovering even part of this wasted gas would ease pressure on markets and strengthen supply resilience amid ongoing geopolitical uncertainty.

### **Compliant supply remains available**

Claims that methane transparency will sharply restrict gas supply are not supported by market evidence. Analysis by [Rystad Energy](#) indicates that by 2027 global gas capable of meeting OGMP 2.0 Level 5 reporting is expected to exceed projected EU gas demand by more than double.

Rystad also projects around 4 percent annual growth in global LNG supply, with market conditions likely to ease toward the end of the decade as new planned capacity comes online. While recent disruptions highlight that deliverability and transit routes remain near-term constraints, these factors do not change the medium-term supply outlook or Europe's ability to prioritise transparent and lower-risk sources.

### **Geopolitical risk should not be misattributed to methane rules**

Recent events highlight how exposed oil and gas markets remain to geopolitics and physical infrastructure constraints. These risks are real but external to the Methane Regulation. Attributing supply stress or price volatility to methane transparency misdiagnoses the true causes of disruption.

Rather than contributing to instability, methane rules strengthen operational discipline and reduce system-wide risk, supporting market resilience during periods of geopolitical uncertainty.

### **Costs are marginal and price impacts negligible**

Analysis by [Carbon Limits](#) finds that achieving OGMP 2.0 Level 5 reporting within three years would represent only around 0.03 to 0.6 percent of production value, even for companies with minimal existing methane monitoring.

These costs are marginal in the context of recent [record profits](#) across the oil and gas sector. Recent price volatility is driven by geopolitics and infrastructure constraints, not methane measurement, reporting and verification.

### **Implementation is workable and proportionate**

The Methane Regulation was designed to reflect the reality of complex global supply chains. As the Commission develops upcoming guidance on penalties and on measurement, reporting and verification (MRV) and tracing, it is essential that this guidance is robust and well-grounded to avoid weakening the effectiveness of the Regulation in practice.

Carbon Limits' analysis shows that credible verification can be delivered through proportionate approaches, including desk-based, hybrid, and sampling-based models, without imposing the most burdensome option across all assets.

Feasibility is therefore not the barrier. Timely implementation is now the remaining priority. The Regulation builds on existing practice and tools already used across much of the sector.

### **Methane action complements decarbonisation**

Methane mitigation is not a substitute for structural decarbonisation of Europe's energy system. It is a necessary and complementary measure that reduces near-term risk and improves system performance while longer-term changes to reduce the EU's fossil fuel dependence – such as clean power deployment, electrification, and infrastructure build-out – progress.

By cutting methane waste, the Regulation lowers emissions and helps protect consumers during the transition.

### **Conclusion**

The EU Methane Regulation is a practical risk-management tool that supports energy security while advancing climate objectives in an unstable global market. In times of crisis, regulatory certainty strengthens resilience rather than constraining it.

Weakening or delaying implementation would undermine confidence, lock in higher-risk supply relationships, and increase exposure at the moment when reliability and comparability of supply matter most. A clear and predictable regulatory framework is also essential for long-term investment planning.

We therefore urge the Commission and Member States to reaffirm their commitment to a timely implementation, refrain from measures that would delay or dilute the Regulation, and uphold the principle that transparency underpins both energy security and credible decarbonisation in a volatile geopolitical context.

Sincerely,

- Air Pollution & Climate Secretariat (AirClim)
- Amici della Terra (AdT)
- Center for Climate Crime Analysis (CCCA)
- Centre for Transport and Energy
- Clean Air Task Force (CATF)
- Climate Action Network (CAN) Europe
- Deutsche Umwelthilfe (DUH)
- ECCO Think Tank
- Ecological Manifesto - ManEco
- EKOenergy ecolabel
- Environmental Defense Fund Europe
- Environmental Investigation Agency (EIA)
- European Environmental Bureau (EEB)
- Fossilvrij NL
- Friends of the Earth Bulgaria - Za Zemiata
- Friends of the Earth Europe
- Friends of the Earth Ireland
- Global Witness
- Green Transition Denmark / Rådet for Grøn Omstilling
- Instrat Foundation
- Klima Fokus
- PowerShift e.V.
- Priatelia Zeme - CEPA (Friends of the Earth-CEPA)
- Razom We Stand NGO
- Third Generation Environmentalism (E3G)
- 2Celsius