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Protect the EU Methane Regulation: No “stop the clock” through the backdoor

To: Executive Vice-President Ribera, Commissioner Jørgensen

Copy: DG ENER Director General Celine Gauer, Deputy Director General Mechthild Wörsdörfer and DG ENER Head of Unit C.2. Kitti Nyitrai.

Dear Executive Vice-President Ribera,
Dear Commissioner Jørgensen,

The undersigned organisations would like to express deep concerns regarding the draft Recommendation developed by the Commission on the application of Article 33 of the EU Methane Regulation 2024/1787 (EUMR).

The Recommendation proposes that Member States refrain from applying sanctions for infringements of key import obligations under Articles 27, 28 and 29 for at least a three year “grace period” until 2029.¹ Rather than responding to a demonstrated and evidence-based security of supply risk, the proposal uses the current geopolitical context to justify a de facto “stop-the-clock” mechanism as loudly advocated for by the fossil fuel industry and the US administration.

Methane mitigation is not a threat to energy security; it strengthens it. Combined with reducing gas demand through energy savings, efficiency and electrification powered by renewables, it can help reduce the EU's dependence on volatile fossil fuel markets. The **IEA estimates that cutting methane emissions and ending non-emergency flaring could deliver 200 bcm of gas to markets annually and 15 bcm in the short term.** Claims that the EUMR is preventing long-term contracting are also unsupported, as contracts have continued to be signed and renewed since the Regulation entered into force.²

The real source of legal uncertainty today is the absence of national penalty regimes in most Member States. As they stand, these recommendations would create an uneven level playing field between Member States, with some governments like Denmark already implementing ambitious national sanctions,³ while others would further delay the adoption of their national regimes as the recommendation reduces the urgency for governments to act. **We believe the following points should be included as priorities:**

¹ The weak language of recital 24 of the Draft Recommendations suggests that Member States will be allowed to continue the non-appliance of sanctions beyond the three years grace period (“Under normal market conditions [...] and *beyond the temporal scope of this Recommendation*, Member States *may* apply penalties [...].”)

² See Annex 1 for more details. [Uniper](#), [Rewe](#) or [Seife](#) concluded long term contracts since the entry into force of the Regulation.

³ For more details, see the report “[Penalty Regimes for Violations of the EU Methane Regulation in Selected EU Member States](#)”, Ecologic Institute, 2025, Berlin.

1) Clear guidance for case by case assessment instead of blanket exemption.

The three year "grace period" is unjustified and disproportionate, particularly when the Recommendation itself only acknowledges supply risks until the end of 2027. Concerns that EUMR enforcement could jeopardise security of supply remain largely unsubstantiated, with [market analyses](#) expecting that supplies of gas compliant with the Regulation will exceed EU demand in the coming years. **Instead of recommending a blanket suspension of sanctions, the Commission should rather provide guidance on how to identify potential risks on security of supply that the implementation of sanctions could create.** Article 33 already contains the necessary flexibility to address genuine security of supply concerns on a case-by-case basis. **If temporary flexibility is considered necessary, it should be strictly limited to one year⁴**, accompanied by a review of market conditions and supported by a transparent assessment of any actual security of supply risks.

2) Article 27 should be excluded from any suspension of sanctions.

There is no reason to postpone or dilute sanctions for infringements of the information obligations specified by article 27 and the Annex IX, because any well-intentioned importer should be able to implement them without creating risks for supply security. These obligations have already entered into force in August 2024, and they do not require suppliers to alter production methods or modify contracts; they simply require information to be reported by the importer⁵. Diluting sanctions of this article would therefore not only undermine the entire import framework before it is even operational, it would also **disadvantage operators that are already complying** and submitting these information obligations, instead of sanctioning non-compliant companies.

3) The Commission should prioritise implementation, not delay it.

The recommendation should **encourage Member States to urgently adopt national penalty regimes and provide clarity on enforcement.** This includes providing common methodologies for assessing economic benefit and environmental damage, minimum levels of sanctions to avoid "enforcement shopping", practical tools for assessing security of supply implications⁶ and the use of the Technical Support Instrument for competent authorities. It should also strengthen engagement with suppliers and exporting countries to increase the availability of EUMR-compliant gas, including through initiatives such as the Methane Abatement Partnership Roadmap or "[You Collect. We Buy](#)". As the EUMR is built on a gradual implementation pathway, with obligations becoming progressively more stringent over time before the methane intensity standard enters into force in 2030, it is all the more important that Member States establish effective penalty regimes now.

We hope you can take these considerations into account and are looking forward to exchanging on these topics in more detail.

Sincerely,

- Chiara Martinelli, Director at Climate Action Network (CAN) Europe

⁴ For more details see Annex 1.

⁵ For more details see Annex 2.

⁶ For more details, see the "[Recommendations on the Application of Penalties Under the EU Methane Regulation by Member States](#)" developed by CAN Europe in May 2026.

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- Enrico Donda, Gas Campaigner at Food and Water Action Europe
- Jonathan Banks, Vice President, Methane at the Clean Air Task Force, CATF
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- Tommaso Franci, Coordinator of the Methane Campaign at Amici della Terra, Italy
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- Mario Rodríguez, Public Policy Director at Fundación Ecología y Desarrollo (ECODES), Spain
- Kajsa Pira, Programme Director at AirClim, Sweden
- Mary Rice, Executive Director at the Environmental Investigation Agency (EIA), United Kingdom
- Dominic Eagleton, Senior Campaigner at Global Witness, United Kingdom
- Svitlana Romanko, Founder and Executive Director at Razom We Stand, Ukraine

ANNEX 1: CATF, [*“EU Methane Regulation Penalties: Why proportionate, phased penalty regimes pose no energy security risks”*](#), June 9, 2026.

ANNEX 2: Piria, Raffaele (2026) [*“EU Methane Regulation Article 27: The Case Against a Grace Period. Why the ordinary enforcement regime does not endanger EU energy security.”*](#) Berlin: Ecologic Institute.



За Земята
Приятел на Земята България