

JOINT NGO ASSESSMENT: USE THE RECOMMENDATIONS TO IMPLEMENT THE EU METHANE REGULATION

[The EU Methane Regulation \(EUMR\)](#) has entered a decisive phase of implementation. Against the backdrop of another summer marked by devastating heatwaves, wildfires and droughts, rapidly reducing methane emissions remains the emergency brake to slow down climate change in the near future. **The EUMR is therefore not only a cornerstone of EU climate policy, but one of the world's most significant regulatory frameworks for driving methane reductions** across global fossil fuel supply chains.

Over recent months, implementation has taken place amid considerable political and industry pressure. The European Commission's Recommendations on penalties have indirectly echoed the long-called stop-the-clock asks by industries, while the Recommendations on compliance solutions have introduced additional flexibilities intended to address concerns surrounding implementation. Importantly, however, the Regulation itself remains unchanged. The priority for the Commission, Member States and industry must therefore now be clear: **move from debating the rules to making them work, with a focus on positive engagement and pragmatic implementation.**

Providing certainty through effective implementation

The Commission's recommendations seek to address concerns that the EUMR would constrain oil and gas supplies to access EU markets through a grace period on sanctions and more flexible tracing solutions, going beyond the security-of-supply safeguards already provided for in the Regulation. [Evidence](#) continues to show that energy security concerns are unfounded. Current market pressures are driven by global supply shocks and [price arbitrations](#), not EUMR compliance anxiety.

On penalties, Member States should urgently complete the establishment of effective, proportionate and dissuasive national penalty regimes. This will absorb the legal uncertainty claims raised by some stakeholders. Any flexibility linked to security of supply should remain strictly targeted to the specific and limited circumstances for which it was intended. It must not become a general exemption from enforcement, nor be extended to domestic obligations that have no bearing on the EU's security of supply. Weak or inconsistent penalty regimes would create incentives for non-compliance and risk enforcement shopping and fragmented implementation across Member States. The European Commission can support Member States at the technical level by providing best practice examples of countries like Denmark which already enforced compliant penalty frameworks, while steering competent authorities in use of the recommendations.

On compliance solutions, recognising multiple pathways clearly demonstrates that compliance with the Regulation is possible. The solutions proposed can help operators navigate complex supply chains, and provide enough flexibility to respond to the reporting obligations of the quickly approaching 2027 deadline. It remains important here to highlight that the first fully verified reports are only due in 2028. However, flexibility cannot come at

the expense of environmental integrity and robust data monitoring and reporting. In particular, for complex supply chains, trace-and-claim should remain the default approach, alongside robust safeguards for any alternative compliance mechanism.

Three priorities for the next phase of implementation

1. **Rule out reopening or amending the EUMR.** Renegotiating a legislation adopted with broad support by the co-legislators only two years ago would create years of regulatory uncertainty while obligations are still in application, and would not answer to any administrative burden claim. It would be a disproportionate and counterproductive response to solvable administrative challenges and would **severely undermine the EU's international credibility on methane just ahead of COP31**, especially as exporters such as [Algeria](#) or [Turkmenistan](#) are improving methane monitoring and reporting and [other exporting countries](#) have the ambition to work on equivalent regulatory frameworks.
2. **Accelerate implementation and ensure consistent enforcement across the EU.** All Member States should rapidly put in place ambitious penalty frameworks to avoid fragmentation and provide operators with legal certainty. Where necessary, the Commission should provide technical guidance promoting best practices from already existing implementation successes, rather than respond to political pressure by further weakening enforcement. **Publishing the Methane Transparency Database soon in September as announced will also support a faster and more constructive implementation process.**
3. **Resolve the remaining technical verification bottleneck** by endorsing the [EEMDL protocol](#). Member States can easily provide the needed clarity for National Accreditation Bodies to accredit independent verifiers in line with the Regulation, by officially endorsing existing international verification protocols such as the EEMDL protocol.

The way forward is implementation, not deregulation

Implementation is already underway. The Commission's recent Recommendations provided additional flexibility to address potential uncertainties; they should now enable implementation to advance.

Ahead of the next Energy Council and COP31, the EU should send an unequivocal signal to its international partners and the market: the rules are in place, compliance is achievable, and Europe remains committed to implementing them.

The task now is to make the EUMR work: quickly, consistently and with its full environmental integrity.

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