Make the Additional Year Count: A simple implementation roadmap for the EU Methane Regulation

Ahead of the Council's decision on the EU Methane Regulation, **the focus for Member States, as part of their responsibility for implementing EU energy policy, should be on (1) identifying the real implementation bottlenecks and (2) addressing them through concrete measures, with clear responsibilities assigned to those empowered to act.**

The existing regulatory framework provides the necessary basis for implementation. **The additional year should be used to make it fully operational through a politically backed roadmap**, with clear responsibilities and milestones, supported by cooperation among Member States, the Commission, competent authorities, accreditors, industry and market providers.

This proposed one-year implementation plan, presented below, identifies four simple steps, including verification and accreditation as the core roadblock to resolve, and tracing, penalties and technical standards as areas where additional clarity would support a fully operational system. It sets out concrete actions and identifies the stakeholders best placed to deliver them, demonstrating how the remaining challenges can be resolved within one year.

Proposed one-year implementation plan

Unlocking verification and accreditation is the most pressing priority for effective implementation of the EU Methane Regulation. Existing verification solutions provide a basis for progress, but procedural uncertainties need to be resolved. Greater coordination on traceability, penalty regimes and technical standards will also enable harmonized decision-making, strengthen stakeholder confidence and support full implementation of the Regulation. **The concrete steps outlined below can help overcome all pending questions about compliance**, alongside continued constructive engagement from industry.

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What needs to happen?	Who needs to act?
1. VERIFICATION **Establish clear verification criteria to help accreditors and competent authorities assess protocols against the Regulation's requirements and resolve the accreditation and verification bottleneck.** The issue is not a lack of available solutions, as EEMDL and the upcoming OGMP verification protocol already align with the Regulation. A common basis for assessing existing verification approaches would provide national accreditation bodies with the clarity and confidence needed to take them on with assurance.	✓ **Commission** issues guidance upon Member State request and monitors its implementation. ✓ **European accreditors** agree on a harmonized approach on accreditation of verifiers based on Commission's guidance. ✓ **Competent authority network takes** responsibility for coordinating a harmonized approach to assessing compliance with verification requirements, including reviewing verification statements and supporting documentation submitted by operators and importers.
2. TRACING **Ensure the harmonized application of Commission's optional model clauses on compliance solutions for tracing.** This ensures the implementation of the Commission's clauses that aim simplicity and flexibility through the availability of multiple options - direct tracing, trace-and-claim, certificates	✓ **Competent authority network** agrees a coordinated approach on demonstrating the origin of fossil fuels in consultation with industry and by applying the Commission's optional model clauses. ✓ **Commission** supports member states by providing clarification on demand by member states
3. PENALTIES **Establish harmonized national penalty regimes** This provides legal certainty, regulatory integrity, and uniform treatment of importers across the EU.	✓ **Member States** adopt national regimes. ✓ **Competent authority network** coordinates harmonized enforcement approaches, with Commission support.
4. STANDARD **Finalize methane emissions quantification standards.** While the upcoming ISO/CEN standard is **not indispensable to start complying** with the regulation, it can provide additional clarity in aligning monitoring practices with and beyond OGMP 2.0 operators.	✓ **Technical committees at ISO/CEN led by major industry representatives** explore internal procedures to accelerate delivery of the standard, which already builds upon pre-existing technical work.

Why support the Commission's proposal for a one-year postponement?

Supporting a one-year postponement provides sufficient time to address the essential implementation challenges and break the current deadlock, while avoiding the additional risks and uncertainty associated with further delays or amendments.

1. **Further delays would only postpone these challenges rather than resolve them -** The remaining challenges are limited and primarily procedural, requiring political and institutional commitment to operationalize existing technical solutions. A clear implementation roadmap with outlined responsibilities and milestones for relevant

stakeholders would ensure steady progress.

2. **The current legislative process should not become a broader review of the Regulation -** A dedicated review is already planned for January 2028 under Article 36, allowing for an evidence-based assessment after sufficient implementation experience. Broadening the current process risks politically driven amendments that undermine the coherence of the regulatory framework. **The current process should remain narrowly focused on unlocking confidence in compliance.**

3. **Avoid creating further market uncertainty through prolonged negotiations and broader amendments -** Parliament's amendments have already widened the scope of negotiations. Further demands risk prolonging the legislative process and creating an unpredictable outcome, **increasing market uncertainty while national authorities still need to prepare for implementation.**

4. **Industry risks facing a moving target, not failing to deliver -** Industry is making substantial progress: OGMP 2.0 covers 43% of global and 88% of European oil and gas production, while Level 5 reporting has tripled in one year. TotalEnergies has reached Level 5 across its operated production, with ExxonMobil, bp, Eni and Equinor also making significant progress (UNEP, 2026). **Further delays risk disadvantaging first movers and undermining investment incentives.** Industry should also contribute expertise and actively participate in resolving outstanding implementation issues.

5. **Postponing the Regulation will not protect European households and businesses from high energy prices -** S&P Global reports that analysts expect the one-year postponement to have little impact on LNG prices, while the Commission confirms that the Regulation has not been shown to drive price increases. Meanwhile, over 200 billion cubic metres of gas are wasted globally annually through leaks, venting and flaring, equivalent to roughly two-thirds of EU gas consumption. **Recovering this gas can strengthen energy security and ease supply pressures.**

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