

Dear Members of the European Parliament,

Tomorrow, the European Parliament will have the opportunity to support a landmark position on the Methane Regulation. This is a critical piece of legislation poised to both slow global warming and increase energy security by reducing methane emissions in the energy sector.

We, the undersigned organisations, are writing to call on your support for the report voted in the ENVI-ITRE Committees. We have deep concerns over plenary amendments 268-280, tabled by a small group in the EPP and ID groups from mainly three countries, that would fundamentally undermine the regulation's scope and completely disregard the agreement found in Committees between the EPP, S&D, Renew, Greens/EFA, ECR, and The Left.

Methane is over 80 times more potent than carbon dioxide over 20 years, making methane mitigation a unique solution that can help **prevent irreversible climate tipping points**, while also providing economic benefits for European companies and citizens. It's estimated that the methane saved from leaks could amount to 600 kt of methane each year,ⁱ roughly equal to the consumption of gas in nearly 1 million French homes.

In the midst of an energy and climate crisis, it's more important than ever for **energy security** to ensure that this energy arrives to consumers and isn't wasted. Moreover, according to the IEA's Methane Tracker, around 80% of the options to reduce emissions from oil and gas operations worldwide could be implemented at **no net cost**.ⁱⁱ

The joint draft report on the Methane Regulation, prepared by the ENVI and ITRE committees, reached important compromises on some of the most effective measures to reduce methane emissions within the EU, and works towards setting critical standards for imported energy, a critical step strengthening Europe's energy security. It was supported in the committees by a wide margin of 114-15, with 3 abstentions, indicative of the strong cross-party support for the agreements reached. **These compromises had the support of the EPP, S&D, Renew, Greens/EFA, ECR, and The Left.**

The tabled plenary amendments 268-280 not only drastically change the compromises reached in the ENVI and ITRE Committees after months of negotiations, but also severely undermine core functions of the entire regulation. These amendment proposals include drastic changes such as, but not limited to:

- **A new loophole that could exempt companies from new rules from the start (AM 269; Article 13):** This would exempt a significant number of large companies from complying with their obligations on leak detection and repair (LDAR) and on venting and flaring, domestically and for imports, from the entry into force of the legislation, as some large companies are already claiming to meet a 0.2% methane intensity performance standard, which is not underpinned by agreed MRV standards, and would be therefore off the hook from any new rules from the start.ⁱⁱⁱ Furthermore, this standard can be misleading as larger facilities might already reach the required intensity standard due to their high production rate, and still emit substantial quantities of methane into the atmosphere.
- **Reducing the frequency of inspections for leak detection and repair and creating an incentive to not find leaks (AM 270; Article 14):** This would decrease the frequency of leak detection and repair inspection for aboveground components from every 2 to every 6 months, and reduce the frequency for underground components from every 5 months to one year. This would make the EU severely lag behind its international partners. The US and Nigeria already have planned rules for LDAR with a 3-months frequency.^{iv} Canada announced last year monthly LDAR. Frequent LDAR is the only proven way to avoid methane emissions, estimates range between avoiding 70% and 80% of fugitive emissions through quarterly inspections, and at least an additional 10% for monthly inspections.
- **Reducing the frequency of leak detection and repair inspections on dubious grounds (AM 271; Article 14):** This would double the period in between LDAR inspections if the percentage of leaking components is lower than 2.0%. Unfortunately, the percentage of leaking components is not an appropriate or effective way to measure the total emissions of a facility because the distribution of leaks is highly skewed. While most leaks release a low amount of emissions, a very small number of leaks can represent a high quantity of emissions if even one is a super emitter. Basing the frequency of inspections on the percentage of leaking components could allow large quantities of emissions to continue unabated.
- **Creating an incentive for companies to not find their leaks (AM 271; Article 14):** This would allow for fewer LDAR inspections when leaks haven't been found for some time, despite all scientific evidence showing leaks to be unpredictable both in time and location, and past leaks provide no indication for future leaks. This approach was tried in the US 15 years ago and abandoned when it was proven to be an

incentive for companies to not find their leaks rather than an incentive to prevent them.

- **A new loophole to weaken new rules on reporting requirements for imports (AM 278-280; Article 27):** This would severely weaken new rules on energy importers by allowing importers that don't meet their obligations to be exempt from penalties by simply showing 'reasonable endeavours' were taken to find the information. The EU imports 97% of its oil and 90% of its fossil gas, meaning 75-90% of the methane emissions attributed to EU consumption occur outside its borders. Strong import standards are vital to address the emissions due to EU consumption, and prevent unnecessary waste that undermines European security.

While these amendments were tabled by a small group of MEPs in EPP and ID, they can't be ignored as they would be extremely damaging for the level of ambition of the measures adopted and they would radically change the agreement found in the ITRE and ENVI Committees. A strong and united position from the European Parliament will be vital for the regulation's success in cutting methane emissions, which was identified in the last IPCC report as a key priority.

We are therefore calling on you to oppose the aforementioned plenary amendments 268-280, and to maintain support for the position jointly agreed upon by the ENVI and ITRE Committees, including by the EPP group.

Sincerely,

Climate Action Network (CAN) Europe – Esther Bollendorff, Senior Gas policy Coordinator

Instrat Foundation (PL) – Michal Hetmanski, CEO

2Celsius (RO) – Raul Cazan, President

Environmental Investigation Agency – Mary Rice, Executive Director

Environmental Defense Fund – Flavia Sollazzo – Senior Director, EU Energy Transition

Food & Water Action Europe (FWAE) – Enrico Donda, Gas Campaigner

Clean Air Task Force (CATF) – Jonathan Banks, Global Director, Methane Pollution Prevention

Deutsche Umwelthilfe (DUH) – Sascha Müller-Kraenner, Executive Director

Ember – Conal Campbell, Coal Mine Methane Policy Analyst

ⁱ International Energy Agency. Oil and Gas Dataset, 2021. This value corresponds to 2020 emissions for the entire European Union, which amounts to 0.59862 Tg.

ⁱⁱ International Energy Agency (IEA). Global Methane Tracker 2023. [Available here](#). This cost estimate is based on 2022 gas prices.

ⁱⁱⁱ Several EU companies are members of the OGCI, which have committed to reach an intensity "well below 0.2% by 2025. However, depending on the granularity at which the standard is applied, "low-intensity facilities" could compensate for "high-intensity facilities" for a single operator in a given region. One study shows intensities of 0.10-0.12% and 0.04-0.07% for the distribution networks in the cities of Utrecht and Hamburg, respectively. See: "Methane mapping, emission quantification, and attribution in two European cities: Utrecht (NL) and Hamburg (DE). 2022. [Available here](#)."

^{iv} In Nigeria, the 3-month frequency will be implemented in the third year since the entry into force of its regulation, in late 2022. See: IEA. "Guidelines for management of fugitive methane and greenhouse gases emissions in the upstream oil and gas operations in Nigeria." 2022. [Available here](#).