



Should the EU enforce or delay its Methane Regulation?



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I am writing as the Chair of an independent group of scientists. The Climate Crisis Advisory Group (CCAG) has no commercial nor national interest in the current question on the EU's Methane Regulation. We have written this impartial report because a decision of significant consequence is currently being taken and we are concerned that the science is largely absent from the discussion.

This summer the European Commission was pressed by 17 member states to reopen the EU Methane Regulation. For a time it held the line, offering relief instead through a suspension of penalties and a route to compliance through tradable certificates. In October 2026 it went further, proposing a binding one-year postponement of the import obligations themselves - a proposal now being fast-tracked through the European Parliament and the Council. These moves have shifted the terms of the discussion.

There are two questions that will now determine what this law becomes:

- First, would enforcing it put Europe's energy supply at risk?
- And the second, which is barely being asked, will a rule enforced through tradable certificates cut methane emissions at all?

Our report answers both these questions. On the first, our reading of the evidence is that enforcement does not threaten supply. On the second, we find an under-examined risk, and we set out, as scientists, what the rule must do to deliver something meaningful.

This is important because *methane is the fastest circuit breaker we have on near-term warming: it is more than 80 times as powerful as carbon dioxide over 20 years, and effectively gone from the atmosphere in a few decades. Cutting it now means warming slows down within years, with near-term improvements for climate risk.* There are few decisions in European policymaking that carry that kind level of leverage. Yet this decision is being handled almost single-handedly as a trade question, weighed against the price of a winter's gas.

Our message to those taking this decision is that a law that is measured but not enforced is not a law. It is an aspiration. Europe now has both the evidence and the buying power to hold the line on this. We have come too far to water it down now.

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Sir David King

Founder and Chair,
Climate Crisis Advisory Group

This is an independent scientific assessment of a single question: should the EU Methane Regulation be enforced as it stands, or suspended? We approach it as scientists with no stake in the outcome, and we organise our response around two questions that inform our stance.

The first question is supply. It is claimed that enforcing the rule from 2027 would put a large share of Europe's gas imports at risk. Our assessment of the evidence is that it would not. The alarming figure most often cited rests on assumptions the Commission has itself moved away from. Compliant supply does exist. What the rule actually asks for on 1 January 2027 can be delivered. Genuine uncertainty remains, on crude oil and on 'Day 1 Deliverability'. But that should be settled through evidence-based decision-making rather than a blanket delay.

The second question is whether the rule will still cut methane emissions. This is what we mean by its integrity, and it is underexamined in the political debate. The concession that calmed the supply fear, allowing importers to rely on tradable certificates rather than physical tracing, has opened a serious risk. A certificate can be bought and sold. In a loose system, the best performers can sell their clean credentials to the worst, so the importer looks compliant while nothing changes with the wellhead. The rule would move paper between companies rather than change what actually happens at the wellhead. We think this risk deserves most attention. It is fixable, and we show how later.

The stakes are immediate. Methane is the quickest circuit breaker on near-term warming, and with climate records already being broken the cost of delay is being paid by business and voters now – not in some distant scenario. The economics point the same way, with compliance being cheap, much of it pays for itself, and predictability is what industry values, so enforcing the rule is the pro-competitiveness choice. Where we agree with existing analysis, we say so and lend it independent support. Where the evidence is contested, we also voice that.

Our core asks are **three**:

- 1** Enforce the law as written and complete the national penalty regimes in 2027.
- 2** Set the certification criteria strictly, so that a certificate corresponds to a real, independently measured emissions performance. And, in parallel and not as a precondition for enforcement,
- 3** Commission an independent evidence base on both supply and integrity to inform the review due in 2028.



The headline figures for the EU Methane Regulation

- **Over 80× over 20 years** (around 30× over 100 years) is methane's warming power relative to CO₂.
- **Roughly 30%** of the warming experienced to date is attributable to methane.
- **~0.3°C** of warming avoidable by 2045 from a 45% cut in methane this decade.
- **~70% (~85 Mt)** of global energy sector methane is abatable with existing technology, most of it oil and gas.
- **~200 bcm/yr** of gas is wasted worldwide through leaks, venting and flaring, recoverable through abatement.
- **Several times the EU's import demand** - this is the compliant gas supply already estimated to exist by 2027 (the multiple is contested)
- **2-15% methane slip** measured directly from an LNG carrier's engines, a reminder these emissions are real and now visible.¹



What is the EU Methane Regulation? (in brief)

In force 4 August 2024. Venting and flaring limits from 2026. Methane Transparency Database in 2026 (TBC). Importer traceability obligations from 1 January 2027.

First importer MRV-equivalence report due 31 May 2028. Methane-intensity standard from 2030. Commission review of the Regulation's application due by 1 January 2028 (Article 36).³

The Commission's proposal of 14 October 2026, if adopted, would move the importer obligations to 1 January 2028 and the methane-intensity standard to 2031; it does not change the leak-detection-and-repair or venting-and-flaring rules.



The EU Methane Regulation is adopted law, legally binding since 2024, and is now entering the phase where it begins to take effect. The debate now in Brussels and capitals across the EU is currently about whether, and to what extent, that text will be enforced.

The Commission's position has moved in two stages. On 20 July 2026 it declined, for the time being, to reopen the Regulation's text, and instead issued two non-binding recommendations that softened it by other means. One (i) confirmed that importers need not physically trace methane molecules and may instead rely on certification. The other (ii) asked member states to suspend penalties on importers for 2027 to 2029, reaching any supply contract concluded before 2028 – a measure presented as temporary that could transition into a lasting exemption.

Then, on 14 October 2026, it went further, proposing a binding one-year postponement of the import obligations themselves (COM(2026) 569). The monitoring-and-reporting requirement for importers would move from 1 January 2027 to 1 January 2028, and the methane-intensity standard from 2030 to 2031. That proposal is now before the European Parliament and the Council, where it is being handled under an accelerated procedure. It is to that decision that this report is addressed.²

CCAG's role and the two central questions

Excellent analysis of this file already exists, from the IEA, the Oxford Institute for Energy Studies, RMI, the Clean Air Task Force, the Environmental Defense Fund and Clingendael. This report does not repeat any of that analysis. But what has been missing is an independent scientific perspective to weigh up the evidence rather than argue a side that inserts climate science back into the centre of the decision-making, and that reaches the decision-making rooms where the policy will actually be settled. On supply, we put forward a verdict on already contested evidence. On integrity, we set out what the rule must do to reflect real, well-measured emissions performance, so that it drives actual reductions.

We should also be clear about what this report is not. It proposes no new obligations. It is not an attack on any government or any company, and it takes no position within the wider argument between gas and renewables. Its scope is narrow and its purpose is to help a decision be taken purely based on the evidence.



The recommendations as adopted and the risks they carry

- **Timing.** The penalty relief covers 2027 to 2029, the regime's formative years, when a new rule most needs to demonstrate that it will be enforced.
- **Threshold.** The suspension only carves out large-scale fraud, which leaves ordinary under-reporting unpenalised.
- **The contract relief loophole.** Because relief reaches contracts concluded before 2028, a supplier can sign a long-term deal now and run it for years with penalties suspended.

What is at stake and why now

Methane is the single fastest lever we have on near-term warming. Molecule for molecule, it is more than 80 times as powerful as carbon dioxide over 20 years, and to date, it accounts for roughly 30% of the warming the world has already experienced.⁴ What makes it most valuable is that it clears the atmosphere within about a decade.

If we cut it now then warming slows within a matter of years. Enforcing this Regulation is among the highest impact near-term climate action open to the European Union, and weakening it forfeits avoidable warming this decade.⁵ 10 years of voluntary pledges have not brought energy sector methane emissions down, which is why a binding and enforced rule is imperative.

The EU imports the great majority of its gas and almost all of its oil, so most of the methane emissions attached to that energy are released abroad and upstream of the EU's border. The IEA estimates that the methane emitted to supply Europe's fossil-fuel imports at around four times what is released within Europe's own energy sector. This is to the order of six million tonnes in 2024, a figure comparable to a region the size of Sub-Saharan Africa.⁶ Because more than 40% of the world's oil and a quarter of its gas crosses borders,⁷ a standard set by a buyer the size of the EU reaches emissions far beyond its own territory. That is the single most impactful leverage point that the EU has on global methane; and the economics are unusually favourable, given that abatement is amongst the cheapest emissions cuts available anywhere and much of it pays for itself through the gas recovered.

Why now

2024 became the first calendar year to pass 1.5°C above pre-industrial levels. The long-term average has not yet crossed that threshold, but it is closing on it, and the margin for delay is narrowing.⁸ Impacts are with us now. Recent seasons of heat, flood, drought, and wildfire have been formally linked by attribution science to human caused warming, which is making them more frequent and more intense.⁹

The tipping point window

There is a further reason the near-term rate matters. The next 10 to 20 years are decisive for several large-scale parts of the climate system: the major ice sheets, the Atlantic overturning circulation, permafrost, and tropical forests. As warming pushes from 1.5°C towards 2°C, the risk of crossing thresholds in these systems rises, and once crossed they are effectively irreversible on any human timescale,¹⁰ and the economic damage that follows would dwarf the cost of acting now. What governs that risk is how high and how fast warming peaks in the near-term. That is why methane and the other short-lived pollutants are so important. They are the fastest way to bend the near-term peak down. Cutting them now buys the time the rest of the transition needs.

The EU's gas supply scare: a closer look at the numbers

The loudest objection to enforcing the Regulation is that it would put Europe's energy supply at risk. It would not. This finding should be voiced clearly because the argument has already carried considerable weight in policymaking and technical circles, yet it rests on remarkably little data.

This section offers an independent reading of what gas market models actually show - where they converge, where they diverge, and what decision-makers can confidently conclude from an informed examination of the evidence.

There is a contentious number driving the debate

One figure has come to dominate this discussion. Enforcing the rule from 2027, it is frequently asserted, would place some 43% of EU gas imports – around 114 billion cubic metres – along with the majority of crude oil imports, at risk of exclusion.¹¹ This statistic originates from a single study commissioned from the consultancy Wood Mackenzie by IOGP Europe (the International Association of Oil & Gas Producers, European arm) and Concawe. The headline is often used to argue the case for delaying regulation, typically without meaningful scrutiny of the original study or its methodology.

Three key qualifications are usually left out when the number is cited:

- 1. The Wood Mackenzie study itself repeatedly characterises the result as "illustrative" and explicitly "not a forecast."
- 2. The alarming headline assumes that any gas failing to demonstrate compliance in 2027 simply ceases to flow. This is an assumption embedded in the model, and it is not a provision of the law, which imposes phased, proportionate penalties rather than an outright border prohibition.¹²
- 3. In the same scenario – one that accounts for the long-term contracts the Regulation grandfathers – the study counts the other 57% of 2027 imports, with 27% already meeting the monitoring standard, and a further 30 percentage points from contracts signed before August 2024. A fourth point matters as much. The low compliant volumes in the study followed from its assumptions about physical traceability, and those assumptions no longer apply now that the Commission allows certification. The alarming figure (43% excluded) and the more reassuring one (57% compliant) come from the same modelling exercise. Which of them is quoted reflects a choice about which half of the same result to put first.

Two studies and two different questions

A separate analysis by Rystad Energy, commissioned by the NGO Environmental Defense Fund, finds that supply already capable of meeting the standard runs to several times EU demand by 2027.¹³ This finding deserves to be taken seriously. However, the two studies most frequently set against one another are not answering the same question.

Study	Question asked	What it does not address
Wood Mackenzie (industry commissioned)	How much of today's gas could be excluded under the strictest possible reading?	Whether compliant gas exists in sufficient volume
Rystad Energy (Environmental Defense Fund commissioned)	Do compliant volumes exist at all?	Verification, deliverability, legal risk, refinery fit, or trade flows.

So, the two numbers people cite against each other do not actually touch one another. Rystad's "three times EU import demand" is about whether enough compliant gas exists in the world; Wood Mackenzie's "43% at risk" is about whether today's particular contracts can prove it in time. Both can be true at once. Neither, on its own terms, explains whether enforcement threatens supply.

↗ CCAG's conclusion

When the evidence is weighed dispassionately, the conclusion is much narrower and firmer than either headline suggests. Our conclusion is that: **There is enough compliant gas, and quantity is not the problem.**

The exclusion figure represents a worst-case scenario built on an assumption that isn't even written into the law. The actual question should be whether the "compliant" label can be trusted; and whether the methane performance it certifies reflects genuine reductions on the ground. That is the question at the core of the analysis that follows.

↗ What needs to happen in 2027

The stronger objection is about feasibility, so we should be honest about what the rule asks to happen on 1 January 2027.

- **What the rule requires:** Importers must show where their gas was produced, and that the producer measures its methane emissions to an equivalent standard.
- **What the rule does not yet require:** The methane intensity limit. That comes into effect in 2030.¹⁴

Within this, one key distinction matters. Asking a supplier to document and pass on its producer's monitoring is simple. Tracing a single molecule through a shared pipeline network, where gas from many sources is mixed together, is not.¹⁵ That is why certification is being developed, and it is why the integrity of that certification now matters more than the supply question did.

The means to measure methane emissions well already exist. What is thin is its deployment. The methane that escapes unburned from the gas an LNG carrier burns in its engines (measured directly at between roughly 2% and 15% of that fuel gas, depending on engine load, not of the cargo carried) is a reminder that these emissions are serious and that we can now see them.

Crude and the market

There are two points to make here:

- **Crude is the more difficult case.** Europe imports somewhere between 9 and 11 million barrels of crude per day.¹⁶ More than that could in principle comply with methane standards, but not all of it can reach Europe or suit European refineries. Some heavier grades are difficult to replace without imposing costs on refining. This is a complicated but manageable gap. That is not a reason to suspend or delay the law.
- **The market is tight.** It was reasonable for the Commission to take stock on this. But the tightness stems from the loss of Gulf supply following the Hormuz crisis, with prices up by roughly a third on the year.¹⁷ This is a real squeeze, and it is possible that some importers hesitate in January and that prices stay high this winter. But that pressure comes from the loss of Gulf flows, not from the Methane Regulation, and it is unreasonable to claim the rule threatens supply more than the Hormuz shock already has. Forward prices are already easing as the shock passes.

The rule is not the cause of the squeeze and should not be blamed if storage runs low this winter. If anything, abatement is supply-additive: gas that is not leaked, vented or flared is gas that reaches the market rather than supply the rule takes away

Where this leaves us

Weigh the evidence together and the supply fear narrative does not hold as a reason to pause the law.

Claim	Assessment
43% of imports at risk	Based on worst case modelling assumption and not legal requirement
Phased penalties instead of a border ban	Regulation imposes proportionate measures and it is not about immediate exclusion
57% is already compliant (grandfathered scenario)	Mirror image of the 43%; this is the Wood Mackenzie default scenario read from the other end
Rystad finds 3x compliant supply	Answers different question; doesn't address verification or deliverability
Quantity is not the problem	Both studies agree compliant gas exists; the more important issue is trust in the label

The exclusion figure is a self-described illustration built on an assumption the Regulation never makes. Compliant supply exists. What is needed for 2027 can be done. Where actual uncertainty remains (on crude and on day one deliverability) the answer is to settle it with evidence, through the independent assessment we set out later, not with a blanket three-year delay.

EU capitals should not unpick a law that Europe's own buying power did so much to secure on the strength of a single worst-case model.¹⁸

Certification and the integrity test

On EU soil, energy is a small part of the methane problem. Under current legislation the GAINS model puts the energy sector at around 12% of the EU's territorial methane in 2030, roughly 1.4 million tonnes, with agriculture close to two thirds and waste and wastewater the rest.¹⁹ But energy is still the centre of this fight, because the EU is a large importer, so most of the methane attached to its gas is released abroad and upstream of the EU's border. The import standard, and the integrity of that standard, is the central question.

This is the integrity question, and it is under-examined in the political debate. Even if the EU's supply is not at risk, will the rule actually cut methane emissions now that compliance can be met with a traded certificate? The concession that calmed the supply-fear narrative, allowing certification in place of physical tracing, has in fact weakened the rule. We do not reject certification. Our position is a single one, not three: certification is necessary to build this market, but it only cuts methane emissions if the certificate reflects the real, well-measured performance of the gas and cannot be gamed by loose trading. The sections that follow set out where that integrity is at risk, what would secure it, and the prize if it is secured.

How can a certificate can break the link?

Because a certificate can be bought and sold, a loose or globally unconstrained “book and claim” system means that a clean certificate can be attached to dirty gas. The best performers sell their credentials but the worst change nothing, and the importer is compliant on paper while emissions at the wellhead remain untouched. Strict and provenance focused certification can work. But the risk is a much looser version of certification.²⁰

Geographic scope of the certificate

How well certification works depends most on the geographic scope of the certificate. A certificate for low-leakage gas produced anywhere, claimed against any import, is merely asset shifting; it moves documentation without actually reducing emissions. But a certificate linked to the physical stream is actually direct tracing. The Regulation has settled on the country level, which is a reasonable place to start. But the problem we see is a loose and global book-and-claim. The country level standard should be treated as a basic floor and tightened over time towards basin (the geological production region) level, and eventually towards tracing at the level of the individual asset.

Others also share this concern

The same warning arrives from other analysts with no overlapping interest. The **Clean Air Task Force** finds that under a national book-and-claim model, low-methane attributes can be reassigned to almost any exported volume, leaving no incentive to cut emissions.²¹ **RMI** reaches the same conclusion and recommends direct tracing wherever possible, backed by tightly constrained certificates.²² **Legal analysts** also note that free attribute trading sits awkwardly with the strict wording of the Regulation.²³ Here we see technical, environmental, and legal experts come together from different directions and conclude with the same finding.

↗ Monitoring is not necessarily about mitigation

Beneath the certificate question sits a second one about the measurement itself. The Regulation and the schemes around it lean on a voluntary reporting standard that grades how well a company monitors and reports. It does not say whether it actually abates. A company can reach the top tier by measuring and reporting well while reducing nothing. The measurement can also be thin: a single survey by a contractor can stand in for continuous monitoring, which is one reason self reported emissions from the sector remain well below what independent satellite and aerial observation attributes to it.²⁴ Companies reporting through OGMP 2.0 now account for around 42% of global oil and gas production, yet the emissions they report amount to under 2% of what the Global Methane Budget attributes to the industry, a gap that has widened between 2022 and 2024.²⁵

Measurement has driven cuts, because a company that starts measuring often finds its leaks are bigger, and cheaper to fix, than it assumed, and the best performers do tend to have the lowest emissions intensities. But measurement that is never acted on is not mitigation. The conclusion is that a certificate, or a gold standard, must correspond to a real, independently verified emissions intensity: the Regulation is about measurement, not abatement, but a certificate is worthless if it does not reflect what is actually happening at the wellhead.

↗ Reported cuts are not always cuts in reality

Field measurement points to the same problem. Reported emissions and actual emissions can be a long way apart. Many member states still report on the crudest basis, production multiplied by a standard emission factor, so their actual measurements never meet the national totals. Romania is the clearest case. It is the EU's largest reported source of oil and gas methane, and at one point its reported emissions fell by around 90% from one year to the next, which was one of the largest drops anywhere in the EU's oil and gas record, simply because it changed the emission factor it used. But nothing actually changed in the field. Measurement campaigns in Romania now find verifiable reductions where operators have acted, and also locate tagged leaks left open for months. So the record is wrong in two ways - it shows a reduction that never happened, and misses both the actual cuts being made and the leaks still venting. The fix is that independent atmospheric measurement can be fed back into national inventories (as the Netherlands has started to do) and reporting can be put on a measurement basis.

↗ The law is lagging behind

The *book-and-claim* and *trace-and-claim* approaches were advanced by the Commission but they were not written into the Regulation; they were also endorsed by the Energy Council in December 2025 as ‘soft’ law. Competent authorities themselves describe them as temporary and not yet fully equivalent to producer-level proof. There is no clear legal basis for attribute trading before the statutory review due by 1 January 2028, and a drafting gap compounds it by which importers may report only whether their data was verified, and by whom. The methodology for the 2030 methane intensity standard is also still unset, so the same gas can be scored differently depending on the method chosen.²⁶ These are the right arguments for finishing the framework. A pause only removes the pressure to close them.

↗ What a certificate must mean

A certificate is only a meaningful certificate if it corresponds to a measured and independently verified emissions intensity at the level of the producer. At a minimum that means three things:

1. Measurement at the producer;
2. robust and independent third-party verification; and
3. geographic and commercial limits so that a good certificate cannot be traded against bad gas. This is also close to what RMI and the Clean Air Task Force have proposed.

There is a deeper question here too. The tools to quantify methane with high certainty are not yet mature - satellites reliably catch only the largest leaks, and drone measurement still lacks an agreed protocol, so a rule resting entirely on measured intensities can be challenged. One option the 2028 review should weigh is whether compliance could also be shown through the verified installation of proven abatement technology, as a floor that does not depend on contestable measurements.²⁷ This is contested. It would need careful design to avoid new loopholes, and it sits outside the Regulation's current measurement-and-reporting scope, but it deserves examination in the review rather than dismissal.

↗ Registries matter as much as the gas

Most of the argument is about the gas and how a producer shows it is clean. Far less attention has gone to how the certificates are handled once they exist. Because they can be traded, each certificate needs to sit in a proper registry, carry its own measurement and verification, and be cancelled against a single import so the same gas cannot be counted twice. It also has to meet the Regulation's rules on where it can be claimed, rather than being bought and sold on an open market. That part has largely not been built. Europe has already seen what happens without it, in its own renewable gas and emissions trading certificates and in the wider voluntary carbon market. Certification is needed to build this market and the system behind it needs to hold up.

The verifier gap is small and administrative

The verification framework is unfinished. Accredited third-party verifiers are in short supply, and the reporting and verification protocol has been consulted on but not yet formally approved.²⁸ There is a gap but it is nearly closed. Member states should move quickly to accredit more, and the Commission should approve the protocol. This is an argument to finish the framework, not to pause the law.

↗ The standard is also a signal to exporters

There is an upside as well. A standard that is actually enforced tells the exporters with no certification today, among them Nigeria, Kazakhstan and Azerbaijan, that they will need one to keep selling into the EU. If it works alongside the voluntary schemes buyers use elsewhere, it can push cleaner production upstream and abroad, and be tightened as it goes. That can only happen if the rule is enforced.

↗ The September moment

The EU's Methane Transparency Database is due to publish measured emissions data for the first time, by country, importer and producer.²⁹ Switching off the consequence at the moment verification becomes public would be the hardest case to defend. The instruments to tell an actual reduction are due to come soon so we must use them.

The economics of enforcement

This section is written for the Commission's economic decision-makers and for financial readers, who weigh up questions of competitiveness and predictability. On those terms the case for enforcement is, if anything, much stronger.

Let's start with cost. Much of the energy sector abatement is cheap, but it is also net saving, because captured gas has value. In the GAINS model, the low-cost measures available below \$1,000 per tonne of methane (about \$36 per tonne of CO₂ equivalent) would cut EU27 energy sector methane emissions by roughly 0.6 million tonnes in 2030 at a small net saving.³⁰ This is not only the modellers' case. An independent Harvard synthesis of the cost literature finds that cutting oil and gas methane emissions by around half is relatively inexpensive once the value of the recovered gas is counted.³¹ And the cost of complying with the rule is also small – independent modelling puts it at around €0.07 per unit of gas, roughly 50 times less than the cost of shipping that gas to market.³² The question now is why that is not already being done.

The answer is the case we identify for enforcement. A small saving does not compete for a company's attention or capital against oil and gas production margins of 60 to 100 per cent, so it is overlooked unless it is demanded of them.³³ The cheap tonnes are there; but it is only a binding rule that makes companies do anything about it.³⁴ This aligns with what field researchers are seeing. Oil producers have little reason to deal with the methane emissions that come up with their oil, because their business is about oil. For gas producers, fixing a leak usually returns less than drilling the next well, so unless the rule attaches a cost to it, the gas is left to leak.

This also closes the trap that if abatement were actually cheap the market would already have delivered it. It has not, for reasons that are by now well understood, and that is why a binding rule is needed. And the prize for acting is significant. An independent assessment in the journal *Science* finds that methane action pays for itself at least six times over, avoiding more than a trillion dollars a year in climate damage by 2050.³⁵ We should keep both ends of this reasoning in sight – the low-cost measures, which take energy sector methane emissions down by only about half, and the deeper decarbonisation needed beyond that.

There is a second economic point, and it links the two pillars together. A blanket penalty waiver, like a loosely traded certificate, is a transfer. It rewards the least prepared suppliers and penalises the companies that invested early in compliance. Whether through a supply-based pause or a weak certificate, poor enforcement punishes exactly the firms that did the right thing. And the quiet winners are already speaking up. Investors managing €4.85 trillion have urged the EU to hold the line, and compliant suppliers and certified pilots are proof that the standard can be met.³⁶ For this audience, predictability is an impactful competitiveness argument. A rule that is enforced consistently is one that industry can plan and invest against.³⁷

EU27 methane in numbers (GAINS v4.1c, IIASA, July 2026)

From the July 2026 GAINS dataset (EU27, current legislation baseline, so the methane strategy is already included). EU27 territorial methane is around 11.6 Mt in 2030 – roughly $\frac{2}{3}$ agriculture, about 12% energy, the rest waste and wastewater. Existing technology can roughly halve energy sector methane emissions by 2030. The low-cost measures, below \$1,000 per tonne of methane, cut it by about 0.6 Mt at a small net saving; full technical potential is about a 50% reduction.

CCAG's science-based recommendations

Our recommendations have two strands:

- 1 **what only the Commission can do, and**
- 2 **what member states can do now.**

The second matters more than it may initially seem, because the July recommendation is non-binding, so the important decision now rests with national governments. One of our asks spans both pillars and both strands – this is our flagship one.

Enforce now, make the certificate meaningful, and settle the evidence in parallel

Enforce the Regulation as written, in 2027, and complete the national penalty regimes now.

Set the certification criteria strictly, so a certificate corresponds to an actual and producer-level emissions performance, thereby ruling out loose book-and-claim.

And separately, in parallel, and not as a condition of enforcement, commission a neutral evidence base on both questions to inform the Commission's statutory review due by 1 January 2028: on supply, an honest supplier-by-supplier read of what is compliant by 2027, 2028 and 2030; on integrity, how far certification reflects real emissions performance and how much reduction it drives, and how to tighten it. The evidence can then be used to settle the question.

1

What the Commission can do

- **Set the certification criteria strictly**, and commit to making them tighter over time, so that a certificate means a real, producer-level emissions performance.
- **Commission an independent 'supply and integrity' evidence base** described above, on both questions, to inform the 2028 review.
- **Publish the overdue leak detection and repair act** (LDRA) and the Article 28(3) model contract clauses, stand up the Transparency Database on schedule, formally approve the verification protocol, and accredit more third-party verifiers.³⁸
- **Keep operator reporting and annual publication active** so that self-reported figures can be checked against satellite and database evidence.
- **Consider a technology-based backstop in the 2028 review**. Because direct measurement of methane emissions is not yet mature enough to carry the full regulatory weight on its own, the review should weigh whether compliance could also be shown through the verified installation and operation of proven leak-tight and gas-recovery technology, checked regularly by an independent body such as UNEP's IMEO. It would be a floor that does not depend on contestable measurements, but it would need careful design to avoid new loopholes and it goes beyond the Regulation's current measurement-and-reporting scope, so it is a question for the review rather than an immediate ask.

2 What member states can do now

- **Keep the penalty schedules you have already notified.** The recommendation is non-binding and does not displace your obligations.
- **Complete the national penalty regimes that are still outstanding.** Only two of the 27 were notified on time and the Commission's own text points to completing them.³⁹
- **Make any forbearance conditional and not calendar based.** Tie relief to a formally declared supply emergency and to the 2028 review, and guard the security of supply derogation against becoming a race to the bottom.
- **Coordinate between member states.** A patchwork of 27 national approaches produces commercial uncertainty that can be used to argue for a delay.
- **Make the data reach the record.** Many member states still lack a competent authority able to handle the data and they should set one up. National reporting should move onto a measurement basis, so the emissions the Regulation captures reach the official numbers and inform enforcement. The means already exist: the EU's PARIS project has produced measurement-based annexes to national inventories, and the Netherlands has adopted them. Repair should be enforced since leaks are often found and then left. And emissions data should be open and checkable rather than held privately. This would need only a few skilled people in each country.

↗ A litigation backstop

Importing non-compliant volumes still breaks the law. The obligation is in force; only the penalty is suspended and only for a time. That leaves importers exposed to civil liability, and it takes only one successful case to create changes in the marketplace.⁴⁰

Conclusion

The answers to two questions will determine what shape this law becomes and how it is implemented. On the question everyone is talking about, enforcement does not threaten Europe's energy supply. On the question less people are talking about, the risk that a traded certificate reallocates rather than cuts methane emissions is considerable.

The timing is also pressing. EU energy ministers meet on 29 October, and the Commission's own review of the Regulation falls due by 1 January 2028; and the rule should be upheld on its own terms, rather than being folded into the wider 'energy omnibus' package.

Now that the tools to do so have finally arrived to make this law work, we need to apply them to the EU Methane Regulation to make it actually work in practice. Compliant supply exists. The cost of compliance is small. What has been missing is the resolve and political will to make it happen.

Europe has come a long way to secure this Regulation and it has the buying power to make a difference in the global market. We think that this one can now be enforced, and it should be.

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1. Figures are sourced where each is discussed. Warming power and share of warming: IPCC AR6 WGI (2021). Avoidable warming from a 45% cut: UNEP & CCAC, Global Methane Assessment (2021). Abatement potential and wasted gas: IEA, Global Methane Tracker 2026. Compliant supply multiple: Rystad Energy for the Environmental Defense Fund (2025/26). LNG carrier slip: Balcombe et al. (2022).
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38. European Commission, Recommendation on penalties (2026) and the Article 28(3) model contract clauses; the leak-detection-and-repair implementing act (overdue) and the Transparency Database are the framework elements to complete.
39. On penalty regime status: only two of the 27 member states notified a compliant penalty regime on time, and only Denmark's is fully compliant and in force (Ecologic/CAN Europe, 2025; OIES NG-205, 2026). Article 33(2) allows member states to refrain from penalties where security of supply would be endangered – the derogation to guard against a race to the bottom.
40. The Recommendation is non-binding and cannot amend the Regulation; the underlying importer obligations remain in force during the penalty pause. The civil liability exposure that follows is CCAG's legal argument built on that fact, not a separately established holding.

