

Reducing methane emissions in Ukraine during wartime and implementing the EU Regulation

Ukraine and Regulation (EU) 2024/1787 on the reduction of methane emissions in the energy sector

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Methane matters

27%

of Ukraine's greenhouse gas emissions in 2023 (GWP100)

EU average ≈ 12%

52%

of Ukraine's near-term climate impact on a 20-year lens

1.5–2.0%

of gas produced is lost as upstream methane

EU 0.3% · Norway 0.02%

Energy is the dominant source. The sector accounts for about 71% of national methane than waste ~19%, agriculture ~10%. Within energy sector: 88–90% comes from oil and gas operations, and 98–99% of that is fugitive rather than combustion.

In pre-war period dominated a trend of rising methane emissions (2017-2021). Over 38,000 km of mostly Soviet-era transmission pipeline, sustained under-investment in maintenance, and limited regulatory oversight of losses.



Commitments

2020

Climate and Clean Air Coalition; Naftogaz joins OGMP 2.0

2021

Updated NDC: –65% GHG by 2030 against 1990

2021

COP26 Glasgow — Global Methane Pledge: –30% by 2030 vs 2020.
Powering Past Coal Alliance: coal-free power generation by 2035

2022

Energy Community Ministerial Council Decision 2022/02/MC-EnC:
–65% GHG to 309 Mt CO₂-eq;

2024

COP29 — Global Methane Pledge re-confirmed, linked to
harmonisation with Regulation (EU) 2024/1787

2025

Second NDC: more than –65% against 1990 by 2035,
i.e. below 320.8 Mt CO₂-eq

NEW NECP

National Energy and Climate Plan

Approved 10 June 2026 — CMU Order No. 562-p (updated 2024 version NECP), together with the Long-Term Low-Carbon Strategy to 2050 (CMU Order No. 561-p)

- Methane is a named policy measure — PM_D_WEM_02, timeframe 2023–2030
- Implementation of the plan will ensure a 30% reduction in methane emissions by 2030 compared to 2020 levels.
- Action Plan CMU Order No. 607-p (2023): 23 measures to 2030; 6 fully completed by end-2024
- Targets: –65% GHG vs 1990; renewables ≥27% of gross final consumption



Implementation on practice

Naftogaz Group

Methane leak inventory is carried out by mobile laboratories using LDAR technology, and actual leak-detection data is being accumulated. A Group decarbonisation strategy is under development with 2024 as the base year: short- and long-term targets for greenhouse gases including methane, the organisational, technical and methodological measures to reach them, and a first estimate of the resources required.

Gas TSO of Ukraine (GTSOU)

Effective accounting of methane leak volumes introduced. All potential leak locations have been inventoried into a detailed database, and annual measurements by specialised laboratories keep it current. LDAR is built into the company's decarbonisation roadmap.

Ukrtransgaz

A methane emissions monitoring system has been introduced in line with OGMP 2.0 methodology, with reporting forms developed and approved by Naftogaz. Leak inventory is run by two units. Reduction measures are delivered within the fuel and energy saving programme.

Ukrgezvydobuvannya

UkrNDIgaz branch mobile laboratories continue LDAR surveys of production and processing facilities. A "Decarbonisation Map" and a "Decarbonisation Policy" have been approved, setting priority of "green" projects to 2030 according to current and expected legislation, with defined time frames.

834.39

thousand m³ of gas preserved by UGV in 2024 —
over 100 leak sources found and eliminated

Naftogaz, GTSOU, and Ukrgezvydobuvannya have all integrated LDAR into their decarbonisation roadmaps, built mobile leak-detection laboratories, and joined OGMP 2.0 — the voluntary international reporting standard of the Oil and Gas Methane Partnership.



The legislative record

Date	Act	What it does
21.05.2009	Law No. 1392-VI	On gas (methane) of coal deposits
21.10.2021	Law No. 1820-IX	Biomethane production: legal basis created, first plants launched; ~80% lower carbon footprint, fully GTS-compatible
22.07.2022	CMU Res. No. 823	Procedure for the functioning of the biomethane register — guarantees of origin (amended in 2025 by Res. No. 828)
06.09.2022	Minenergo Order No. 304	Rules for designing coal mine degasification and operating degasification systems
07.07.2023	CMU Order No. 607-p	Global Methane Pledge Action Plan: 23 measures to 2030; annual reporting to the Cabinet of Ministers
20.03.2024	Law No. 3613-IX	Customs Code amendments on customs control and clearance of certain categories of goods
08.10.2024	Law No. 3991-IX	Fundamentals of state climate policy: legally binding climate neutrality by 2050
18.06.2025	CMU Order No. 711	Implementation of measures aimed at managing methane emissions at closed and operating mines
01.04.2026	CMU Res. No. 438	Reg. (EU) 2024/1787 becomes a Chapter 15 / Cluster 4 benchmark — transposition by end-2027
10.06.2026	CMU Orders No. 561-p, 562-p	Long-Term Low-Carbon Strategy to 2050 and the updated NECP to 2030

Methane is additionally regulated as a pollutant under the Air Protection Law and taxed under the Tax Code within the undifferentiated “hydrocarbons” category. Regulation (EU) 2024/1787 itself is not yet part of the Energy Community acquis.

Regulation (EU) 2024/1787 in the accession process



01

Not yet an obligation — a benchmark of the accession negotiation

The Regulation has applied directly in EU Member States since 4 August 2024. It is not incorporated into the Energy Community acquis, so Ukraine carries no transposition obligation and no binding deadline today. CMU Resolution No. 438 of 01.04.2026 makes it a Chapter 15 / Cluster 4 accession benchmark — key provisions to be transposed by end-2027.

02

What transposition will cover

A framework law, a designated competent authority, measurement-based MRV with independent verification, registries of inactive wells and abandoned coal mines, and rules on venting and flaring.

03

Already done

Alignment status, with an article-by-article self-assessment, presented to the European Commission in Brussels on 08.07.2025. Under Ukraine2EU / Razom We Stand: a 70+ stakeholder kick-off, working translation and Capacity Needs Assessment, technical translation agreed with GTSOU, Naftogaz, UGV, Ukrnafta and DTEK, draft institutional architecture across five bodies.

Unlike EU Member States, Ukraine is not bound by the Regulation today — this work is being done ahead of any legal obligation.



Challenges and problematic issues

1

Security constraint

Written for a peacetime jurisdiction: routine surveys of all sites, repair within 5–15 days impossible. ~20% of the territory unsafe and protection protocols require preventive venting ahead of strikes — which the Regulation prohibits.

3

Institutional uncertainty

Potential competent-authority functions are split across the Ministry of Energy, the Ministry of Economy and Environment, NEURC, Derzhgeonadra, Derzhpratsi and environmental inspection — a risk of fragmented responsibility may slower implementation.

5

Shortage of instruments and staff

The mobile laboratories of three state companies do not deliver the coverage or survey needed. Procurement of necessary equipment constrained by wartime logistics, and qualified engineers are scarce.

7

Ineffective fiscal model

State support to extractive industries covers operating costs but does not stimulate capital investment in emissions reduction. Combined with a symbolic environmental tax rate, this creates a disincentive for modernisation.

2

Transparency versus security

Public registries of sites, leak volumes, repair schedules and participation in global mechanism of notification create targeting risk in wartime. A restricted-access regime for sensitive data is needed.

4

No verification infrastructure

Ukraine has no accredited methane verifiers. Creation of verifiers pool takes two - three years.

6

Coal methane — the hardest block

Most mines are on occupied territory, where measurement is impossible. Compiling the register of mines abandoned after 1954 is further complicated by the loss of technical documentation.

8

Risk of formal transposition

Adoption of framework law without simultaneous verification capacity, staffing and fiscal incentives would make the benchmark formal on paper.

Realising Ukraine's technical methane-mitigation potential is estimated €2.4–3.6 billion of investment over ten years.

Thank you for your attention

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