



Infrastructure for a net-zero Europe

# Methane Emissions

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# MER GIE Position

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## Overall GIE position

- While supporting the EU objective to reduce methane emissions and recognising MER's potential climate benefits, the current design risks the security of supply, affordability, and operational feasibility.
- The current level of implementation by the authorities does not provide legal certainty for operators and leads to unnecessary risks.

## Disproportionate burden on infrastructure operators

- MER applies largely uniform requirements across very different infrastructure segments (e.g., TSOs/SSOs/LSOs/DSOs), without sufficient differentiation.
- Prescriptive LDAR, monitoring, and reporting can **shift resources from abatement to compliance** with unclear added environmental benefit.
- GIE advocates a **risk-based, differentiated approach** tailored to asset type, size, and emissions profile.

## Technical readiness and standards gaps

- Some MER obligations depend on technologies/standards that are not yet fully developed or consistent.
- Missing pieces include agreed detection thresholds, harmonised methodologies and clear verification processes.
- GIE calls for phased implementation, transitional regimes, and recognition of interim/best-in-class solutions.

## External supply and geopolitical implications

Applying MER requirements to imports (pipeline gas and LNG) could:

- Reduce supply optionality,
- Create trade friction,
- Weaken the EU's geopolitical position.

# MER- Security of supply and penalty regimes

## Penalties and enforcement

- The current penalties framework may be applied inconsistently across Member States, creating legal uncertainty and misalignment with actual environmental impact.
- Penalties should be proportionate, predictable, and aligned with best-effort compliance.
- Commission (DG ENER) guidance should avoid over-deterrence that could discourage reporting or investment.

## EU LEVEL

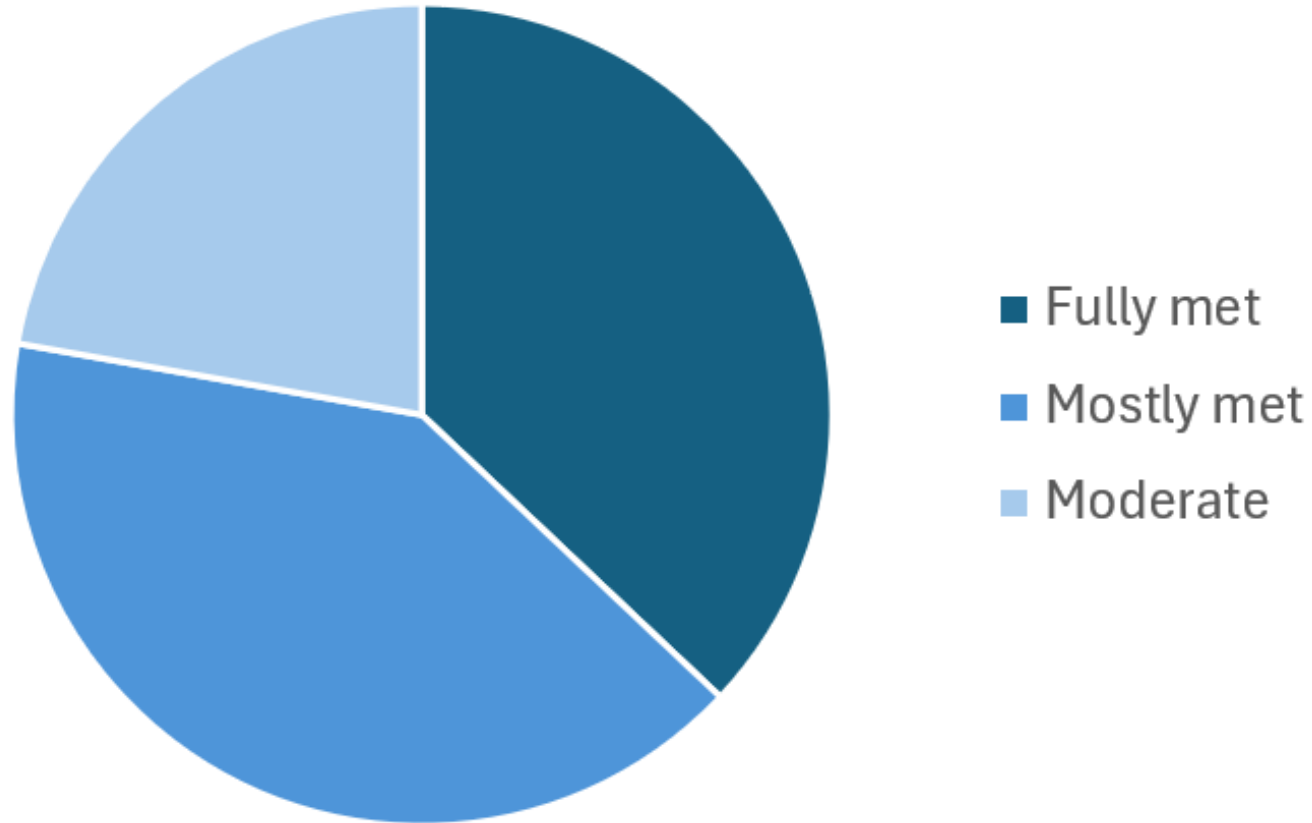
- **Apr 2026:** CZ PM letter to the EC requesting, inter alia, reconsideration of the MER implementation timeline.
- **Ahead of June TTE:** CZ issued a non-paper proposing a **3-year postponement of Chapter V** obligations under the MER.
- The CZ/SK initiative (19 June) was supported by **10 additional MS**
- **26 Jun TTE:** Further supported by **4 MS**, discussed as an AOB information item only;
- **20 Jul:** Commission issues two recommendations on compliance solutions and penalty regimes

## Industry reaction:

- Targeted amendments to the Regulation and a time-limited 3-year postponement of the relevant obligations under Chapter V, in particular Art. 28(1), 28(2) and 29(1), are necessary to ensure a practical and effective implementation framework.
- This postponement should be implemented through a binding EU-level legal measure: non-binding Recommendations or national enforcement discretion cannot provide legal certainty or harmonised application.

# Overview of designated authorities

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Source:

<https://tracker.timeforchange.org/tracker?obligation=Art.+4%281%29+%E2%80%93+Designation+of+national+competent+authorities&view=map>