



GIE, ENTSOG AND MARCOGAZ INPUT ON THE EC CONSULTATION ON THE COMBINED EVALUATION ROADMAP/INCEPTION IMPACT ASSESSMENT FOR A LEGISLATIVE ACT TO REDUCE CH₄ EMISSIONS

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12581>

GIE, ENTSOG and MARCOGAZ welcome the possibility to provide feedback to this public consultation and acknowledge the efforts of the EC to **accelerate methane emissions reduction** to support the EU's greater climate ambition for 2030 and its 2050 climate neutrality objective.

During the last years, we have contributed to have a better understanding of the emissions in the gas sector as well as to build a culture towards net zero methane emissions through a series of **dissemination activities and training sessions**. We remain strongly committed to continue doing it.

During the last months, GIE and MARCOGAZ, together with some upstream organisations have been developing a **glossary on methane emissions** to have harmonised definitions applicable along the gas value chain. This document will be published in the short term.

We all recognise the **potential benefits of the holistic approach** of the recent EU Strategy on methane emissions to cover energy, agriculture and waste sectors, which will **deliver synergies** and **help avoid emissions**.

The implementation of a well-structured, fit for purpose **MRV** (measurement, reporting and verification) system in the EU, in parallel to the **reduction of methane emissions** should be the **priorities**. The previous long term efforts of the gas companies who took early action in measurement and mitigation should be recognised and fairly accounted for.

Regarding the MRV system, we support the **translation of the OGMP framework into EU legislation to be applicable to the full energy supply chains** (from upstream to downstream, excluding utilisation). This will allow improvements to the reporting accuracy as well as the credibility of the data, having all reported emissions related to the energy sector under the umbrella of the future **International Methane Emissions Observatory (IMEO)**.

In order to avoid duplication of emissions reporting and to limit the administrative burden, the IMEO and the national inventory reports of anthropogenic greenhouse gas emissions should be connected in the future.

During 2020, GIE and MARCOGAZ supported UNEP and the EC to extend OGMP framework to the gas mid and downstream segments. In this context, MARCOGAZ developed a **methane emissions reporting template**¹ and a **guide**² on how to fill out the template. Today more than 60 companies have joined OGMP on a voluntary basis of which the majority are our members. Our 3 associations welcome, in

¹ Methane emissions reporting template

https://www.marcogaz.org/app/download/8271109163/WG_ME-756+-+version+20201112.xlsx?t=1606983582

² Guidance for using the MARCOGAZ Methane emissions reporting template

https://www.marcogaz.org/app/download/8271109963/WG_ME-710.pdf?t=1606988780



this regards, the international dimension the strategy also takes into account in order to address methane emissions globally.

With regards to the mitigation measures, we fully agree that the priorities should be the improvement of the **LDAR programmes** (Leak Detection And Repair) and the routine **venting and flaring mitigation regarding the operational conditions (operational safety, security of supply, ...)**. Last year, GIE and MARCOGAZ supported the Methane Guiding Principles with the development of the 2 new **best practices guides** on methane emissions: 1) “Identification, Detection, Measurement and Quantification³” and 2) “Transmission, storage, LNG terminals and distribution⁴.”

GIE and MARCOGAZ launched a **questionnaire on LDAR programmes** to gather information on the current practices carried out by the industry. Based on the feedback received from the industry and the experience of our members, a **technical recommendation on LDAR programmes** has been developed by MARCOGAZ and will be published soon.

As emission mitigation for safety reasons is already and sufficiently covered by existing standards and national laws, we recommend that mitigation for environmental reasons is treated clearly and separately.

In addition, we are currently developing a questionnaire on **venting and flaring** to gather information on the current practices and to identify the ‘quick wins’ of mitigation measures that allow a higher emissions reduction at a lower cost. Based on this information, MARCOGAZ will develop a **technical recommendation**.

Once accurate and reliable data is available, **we are ready to support** the EC in exploring the feasibility and added value of possible emissions performance targets, standards or other incentives for natural gas as means to further enhance methane emission reduction in the EU.

Finally, it is important to highlight that the **investments** on MRV, LDAR and mitigation measures undertaken by infrastructure operators **should be recognised** within the scope of regulated activities by the national regulatory authorities. In the case of non-regulated operators, authorities should also ensure the investments and efforts through European and national incentives.

As we stated in the Gas industry Declaration⁵ on the EU strategy to reduce methane emissions, we stand ready to offer our expertise in this field to help achieving the climate neutrality objective.

³ BPG - Reducing methane emissions: Identification, detection, measurement and quantification
<https://methaneguidingprinciples.org/best-practice-guides/reducing-methane-emissions-through-identification-detection-measurement-and-quantification/>

⁴ BPG - Reducing methane emissions: Transmission, storage, LNG terminals and distribution
<https://methaneguidingprinciples.org/best-practice-guides/reducing-methane-emissions-in-transmission-storage-lng-terminals-and-distribution/>

⁵ Gas industry Declaration on the EU strategy to reduce methane emissions
<https://www.gie.eu/index.php/gie-publications/methane-emissions/industry-declaration/28518-gas-industry-declaration-on-the-eu-strategy-to-reduce-methane-emissions/file>