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Response to European Commission Public Consultation

Draft Implementing Regulation on Templates for Methane Emissions Reporting in the Energy Sector

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ABOUT MARCOGAZ

Founded in 1968, MARCOGAZ is the technical association of the European gas industry. It represents 28 member organisations from 20 countries. Its mission encompasses monitoring and policy advisory activities related to the European technical regulation, standardisation and certification with respect to safety and integrity of gas systems and equipment, rational use of energy as well as environment, health and safety issues. It is registered in Brussels under number BE0877 785 464.

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Introduction

MARCOGAZ welcomes the European Commission's objective of establishing a coherent, harmonised and workable methane emissions reporting system under Regulation (EU) 2024/1787 and supports a common European methane emissions reporting system that is **legally consistent, technically unambiguous, compatible with OGMP 2.0 and practically implementable.**

Following the review of the proposed reporting templates the targeted improvements set out in the following chapters are recommended. MARCOGAZ recommendations recognise the simplifications and safeguards already included in the draft and remain within the obligations established by Regulation (EU) 2024/1787. Specifically, the recommendations focus primarily on clarifying emission classifications, distinguishing between source-level and site-level reporting, clarifying emission-factor units, and ensuring proportionate yet comprehensive venting and flaring reporting. Additionally, reporting deadlines and verifier availability are framed as implementation concerns, noting that any amendment to statutory obligations requires an appropriate legal basis.

References below are to Annexes I and II of the consultation draft, Ref. Ares(2026)9557732 of 9 October 2026. Table numbers and reporting codes refer to Annex II unless otherwise stated.

1. Clarify emission-source classification

References: Annex II, Table 9, rows M-1.2-1 and M-1.2-1-b; Table 10, rows M-1.3-2 and M-1.3-1-b; Table 11, rows M-8-1 and M-8-1-b; Table 12, rows M-5-1 and M-5-1-b; Table 13, rows M-3-1 and M-3-1-b; Table 16, rows M-2.1-1, M-2.1-1-b, M-2.2-2 and M-2.2-3-b; Table 17, rows D-4.1-1 and D-4.1-1-b; Table 18, rows D-4.5-1 and 4.5-1-b; Table 19, rows D-4.4-1 and D.4-4-b. These illustrate the placement of non-flaring incomplete combustion under "Leaks".

The proposed hierarchy places **"Incomplete combustion, non-flaring" under the parent category "Leaks"**, alongside fugitive emissions. This is technically misleading because incomplete combustion is a combustion-related emission mechanism rather than a leak.

MARCOGAZ recommends that this classification should be reviewed against the OGMP reporting framework, where incomplete combustion is treated as a separate emission-source subgroup. Alignment of terminology and source categorization would help avoid ambiguity and inconsistent reporting between the Regulation (EU) 2024/1787 and the OGMP reporting framework.

2. Clearly distinguish source-level, site-level and reconciled emissions

References: Annex II, ("TOTAL EMISSIONS - SITE LEVEL"); corresponding site-level total rows in Tables 8. 9, 10, 11, 12, 13, 16, 17, 18 and 19 (M-1.1-T5 M-1.2-T5, M-1.3-T5, M-5-T5, M-8-T5, M-5-T5, M-2-T5, M-3-T5, D-4-T5, D-4.5-T5 and D-4.4-T5); Table 00, fields (m) and (n). See also Annex I, points 2(c) and 2(e).

To stay aligned with the OGMP frameworks and guidelines, it is proposed that only one total emission value be reported in the template, rather than both source-level and site-level totals. This value should represent the result of the reconciliation process, which will be described in the implementation plan submitted to the verifiers. Where reporting is not applicable, "N/A" should be used, accompanied by an explanatory comment.

In addition, since *« Site-level » is not equivalent to « OGMP level 5 », it is suggested renaming* line D-4-T5 as « TOTAL RECONCILED EMISSIONS – when applicable ».These clarifications should apply consistently to all network operators.

3. Clarify activity factors, emission factors and units

References: Annex II, the columns "Activity factor (AF)", "AF unit", "Emission factor (EF)" and "Emission amount (t CH_4)", and the associated AF/EF footnote, in Tables 8, 9, 10, 11, 12, 13, 16, 17, 18 and 19.

The proposed tables contain separate fields for activity factors and their units, but no corresponding field for the **emission-factor unit**.

A dedicated emission-factor unit field should therefore be added, allowing technically appropriate units such as kg CH_4/component/year, kg CH_4/km/year or kg CH_4/event. Final annual emissions can remain expressed in t CH_4.

4. Clarify distribution-system scope

Reference: Annex II, Table 17, row D-4.2-2-c ("Change/Removal installation of Gas meters"), read in conjunction with Article 1(2)(c) of Regulation (EU) 2024/1787.

For distribution system operator (DSO) reporting, particularly in relation to meter installation replacement and removal, the templates should make clear that only activities falling within the scope of Article 1(2)(c) of Regulation (EU) 2024/1787 are reportable.

The scope note should reproduce the exclusions in Article 1(2)(c) precisely, including metering systems at final consumption points and the excluded parts of service lines on final customers' property, rather than referring broadly to a "point of final consumption".

The option "Not Applicable" should be possible when reporting line refers to exclusions as referred in Article 1(2)c.

5. Ensure proportionate but complete venting and flaring reporting

References: Annex II, Table 20, concerning venting and flaring event reporting; Annex I, point 1(a)–(c), which identifies Table 20 among the applicable reporting templates.

The electronic reporting system should facilitate efficient reporting of numerous recurrent and homogeneous events, for example through batch uploads or controlled grouping, **provided that all legally required event-level information remains complete, traceable and available for verification**.

Recital (5), Article 1 and Table 20 expressly link event reporting to Article 16(2) and Annex III of Regulation (EU) 2024/1787. Annual emissions totals do not replace the required event information; it is therefore recommended to see whether table 20 is necessary or retaining Table 20 while enabling reuse of previously notified data, batch uploads and automatic links to annual totals without double counting. Any grouping must preserve all legally required information.

6. Clarify reporting deadlines and provide proportionate transitional arrangements for verification

References: Recitals (2)–(4) of the draft Implementing Regulation; Article 12(2) and (3) of Regulation (EU) 2024/1787; Annex I, point 1; Annex II, Table 00, fields (k) and (l), concerning verification and methodology information.

In order to allow sufficient time to collect and process all data for the preparation of accurate and comprehensive reports and to ensure compliance with the OGMP framework it is requested to allow data to be included in the database until May 31 of each year. This extension would provide stakeholders with sufficient time to finalize and validate their submissions, ensuring data quality and compliance with regulatory requirements. MARCOGAZ recommends that the regulation explicitly permits this deadline to support effective implementation and stakeholder engagement.

MARCOGAZ members also report potential constraints in accredited verification capacity; The Commission should assess workable implementation arrangements consistent with the applicable verification requirements and cross-border access to eligible services.

It is suggested that an appropriately long transitional period should be introduced, at least until the availability of accredited verification capacity is ensured across the EU. In particular, the application of the verification requirements should be postponed until at least one nationally established accredited verification body is available in each Member State. This would help ensure a level playing field across the EU and avoid disproportionate implementation challenges for operators in countries where such verification services are not yet available.

7. Harmonise uncertainty assessment and quantification-method reporting

References: Annex II, "Uncertainty" and "Quantification method" columns; Annex I, points 2(b) and 2(f).

The instructions should establish a harmonised approach to assessing and reporting uncertainty, with clear references to recognised guidance such as the GUM and relevant CEN and OGMP 2.0 guidance. Common requirements should support comparable uncertainty information from operators and measurement-service suppliers.

8. Clarify equity-share reporting

References: Annex II, Table 00, field (j) ("Equity share"), read together with fields (h) ("Logical test if operated (Y/N)") and (i) ("Name of operator").

Recital (7) already reflects the statutory distinction: reporting covers all methane emissions for operated assets, while emissions from non-operated assets are multiplied by the reporting entity's ownership share, with the required information on operational control. Table 00 and the electronic instructions should implement this distinction explicitly, identifying whether each numerical field contains gross physical emissions or an ownership-weighted amount and preventing double application of the ownership share.

9. Clarify SFABOU identification and geographic information

References: Annex II, Table 00, fields (a)–(g), and bundling footnotes to Tables 10, 17 and 18; Annex I, point 3, including (xi), (xix) and (xx).

Table 00 requires Site, Facility, Asset, Business or Operating Unit (SFABOU) identification and latitude/longitude, but the instructions should explain how identifiers and locations apply to individual assets, asset groups, network areas, facilities and business or operating units, including the bundles already permitted in Tables 10, 17 and 18. The hierarchy should prevent double counting. A single coordinate may not meaningfully represent a network. Annex I, point 3, already provides for role-based access and confidentiality-sensitive disclosure; MARCOGAZ welcomes these safeguards and request concrete rules for geographically dispersed assets, restricted location data and the distinction between information supplied to authorities and information published.

10. Clarify submission to the competent authority

References: Annex I, point 1 and point 3(vii), (viii) and (xv); Annex II, Table 00, concerning identification and access to the MTDB reporting system. This comment concerns the submission workflow rather than an individual emissions row.

Annex I states that operators submit their reports to the relevant competent authority through the Methane Transparency Database (MTDB) reporting system.

Building on this established route, the electronic instructions should define the submission timestamp, acknowledgement of receipt and status confirming delivery to the competent authority and distinguish formal submission from subsequent validation and approval.

Annex I, point 2(f), already requires detailed methodological information to accompany reports submitted to verifiers, with at least the level of detail of OGMP implementation plans; point 1 also provides for methodological information requested by the competent authority. This does not expressly establish submission of a full OGMP implementation plan through MTDB. The instructions should clarify the supporting documents required through MTDB, those provided separately to the authority and those supplied for verification, including documentation of reconciliation, methodological improvements and any relevant materiality assessments.