To: Members of the European Council
Cc: Ministers responsible for Energy in the 27 EU Member States

Brussels, 8 October 2026

EU Methane Regulation: an actionable regulatory framework that preserves energy security, affordability and emission reductions

Dear President Costa,
Dear President von der Leyen,
Dear Heads of State or Government,

We support the intent of the EU Methane Regulation (EUMR) and want it to work in practice for all those involved in its implementation. We, therefore, welcome the recognition that the EUMR's importer requirements cannot be met under the current timetable.

The postponement announced by Commission President von der Leyen on 6 October[1] is a step in the right direction. However, one year is insufficient to fully mitigate these risks and would leave the EU facing the same implementation challenges in 12 months' time.[2]

Ahead of the European Council meeting of 15–16 October 2026, we therefore urge you to **support a three-year postponement of the EUMR's importer requirements**. This would provide the time needed to establish a workable compliance framework, giving companies the legal certainty required to adapt, and keep the EU as an attractive market for the import of crude oil and natural gas. It would also allow the Commission and Member States to assess whether and how compliance with this framework affects European energy security, competitiveness and supply diversification, and to make adjustments if necessary.

The case for a three-year postponement rests on the work still required before importers can comply. These steps build on each other, for example, most Member States will not accredit until the rules exist, and producers cannot be verified until accredited verifiers are available.

- **Design:** verification protocols and accreditation procedures must be established and should be recognised by competent authorities across the Union to enable accreditation.
- **Accreditation:** verification bodies must then obtain accreditation and build capacity across producing countries.
- **Verification:** only once verifiers are accredited, the producers can undergo independent verification, confirming their compliance with the Regulation.
- **Scaling:** certification schemes for those who choose that compliance option must be recognised across the EU and scaled up in all relevant producing/exporting regions to meet demand.

[1] European Commission, Speech by President Ursula von der Leyen at the European Parliament plenary debate in preparation of the European Council meeting of 15–16 October 2026, Strasbourg, 6 October 2026
[2] For importer requirements, compliance depends not only on the global availability of OGMP 2.0 Level 5 crude oil and gas, but also on the ability to demonstrate that imports meet the EUMR's requirements within the prescribed deadlines and without an operational verification framework and compliance solutions approved by Member States, they cannot. Further, experience with the domestic requirements under Chapter 3 has already revealed concrete compliance challenges.

The very process from accreditation through to the first certificates alone is expected to take more than 12 months.[3]

These instruments should be harmonised and operational across all Member States at least six months before the start of the year in which the relevant obligations enter into force. This would **provide market participants with sufficient time to establish the necessary governance, legal, and technical frameworks to comply with the approved and harmonised measures**. Beyond these, all national competent authorities must be designated, penalty regimes established, and secondary legislation determining country-level equivalence adopted.

In this light, we respectfully ask you to support a three-year postponement of the importer obligations due in 2027 and 2028 under Articles 28(1), 28(2) and 29(1), as well as the equivalent requirements set by Article 12(3), with swift adoption by the Council and European Parliament before January 2027. This will **give the Commission, Member States and industry the time to build a framework enabling genuine, verifiable compliance**. We renew and intensify our commitment to work with the Commission and competent authorities to support the timely development and implementation of the necessary compliance framework.

The co-signatories remain at your disposal to provide any further information or technical evidence that may be useful in the context of your discussions.

Yours sincerely,

The co-signatories

AICE

API American Petroleum Institute

BVEG

CAPPO Česká asociace petrolejářského průmyslu a obchodu

center for LNG

energy traders europe

en2x Wirtschaftsverband Fuels und Energie e.V.

eurogas

FuelsEurope Fuelling Europe's Future

IOGP International Association of Oil & Gas Producers

IGU International Gas Union Union Internationale du Gaz

OEUK Offshore Energies UK

Offshore Norge

UFIP Énergies et mobilités Réussir la transition

U.S. Chamber of Commerce

VEMOBIN

[3] Verification capacities will likely be one of the critical bottlenecks: the time needed to define the accreditation basis, for the verifiers to apply for accreditation, obtain it and verify the assets and issue the certificate will exceed 12 months. Meanwhile, verification capacity is already in high demand under other EU instruments such as the ETS and CBAM.