

To: Competitiveness Council (Internal Market, Industry)
Cc: Working Party on Competitiveness and Growth (COMPGRG)

25th September 2025, Brussels

Integrating the EU Methane Regulation into the EU Simplification Agenda

Dear Ministers,

Ahead of the Competitiveness Council meeting on 29 September, we would like to share our recommendations regarding the inclusion of the EU Methane Regulation within the EU Simplification Agenda.

The agenda of the meeting foresees a presentation by the Executive Vice-President Séjourné on the annual progress report on simplification, followed by an exchange of views. We believe this discussion provides a timely opportunity to ensure that the Methane Regulation is considered as part of the broader simplification efforts, as per the Energy Council conclusions of 16 June 2025.

Achieving Europe's climate ambitions requires not only setting bold objectives but also ensuring that policy frameworks are clear, efficient, and practical to implement. The Methane Regulation is a central element of the EU's climate strategy. Its success, however, will depend on minimizing unnecessary administrative burdens, while being efficient, proportionate, and ensuring full coherence with existing legislation. In this context, we welcome the Energy Council conclusions, which invited the Commission to explore options to simplify and ease implementation of the Methane regulation, including through the forthcoming Energy Omnibus. It is equally important that the Competitiveness Council provides its perspective on this Regulation, as a well-calibrated revision will be essential to securing affordable energy while strengthening the competitiveness of European industry.

IOGP Europe has long supported methane reduction efforts, well before the adoption of the Regulation, and remains fully committed to contributing to its success. At the same time, we share concerns expressed by several Member States that certain provisions, as currently drafted, risk unintended consequences, such as undermining energy resilience, raising costs, and complicating supply diversification, particularly as Europe phases out Russian imports and reshapes its energy system.

We commend the Commission's efforts to facilitate dialogue through technical workshops and coordination meetings with Competent Authorities. Yet, as Member States have underlined, addressing the core challenges of the Methane Regulation requires more than discussion: they must be resolved through implementing measures, secondary legislation, and, where necessary, targeted amendments to the primary legislation.

To ensure that the Regulation delivers its environmental objectives while remaining feasible in practice, we respectfully recommend targeted adjustments, including:

- Introducing alternatives in primary legislation and providing flexible compliance pathways where the Regulation sets technically unfeasible or disproportionate requirements (both for domestic production and imports);
- Ensuring legal certainty by clarifying obligations and allowing sufficient time and flexibility for implementation;
- Adjusting disproportionate penalty provisions (such as the potential fine of up to 20% of annual turnover for legal entities) to better reflect realistic compliance progress and available options.

We reaffirm our strong commitment to methane emission reductions and respectfully urge the Commission and Member States to make full use of available instruments, including the Energy Omnibus, to simplify and facilitate the implementation of the EU Methane Regulation. We remain ready to work with you to achieve our shared climate and competitiveness objectives.

Yours sincerely,



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