

GASNATURALLY FEEDBACK TO THE EU METHANE EMISSIONS STRATEGY ROADMAP

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Reaching the ambitious EU 2050 climate neutrality goal requires a reduction in carbon dioxide (CO₂) emissions and a further decrease in methane emissions, which account for 10%¹ of all greenhouse gases (GHG) emissions in the EU.

GasNaturally Members are taking decisive steps to better assess, document and reduce methane emissions, and support the European Commission in developing an integrated EU Methane Emissions Strategy to contribute to cost-effective GHG emissions reduction across the EU.

We support a Methane Strategy that incentivises early action, drives performance improvements, facilitates proper enforcement, stimulates innovation and is flexible to accommodate new technologies and practices.

EU gas industry is making significant progress in reducing methane emissions

The EU gas industry has been working for many years to successfully reduce methane emissions through both mandatory and voluntary programmes, and remains strongly committed to tackling this issue. Based on available data, **the gas industry accounts for around 5%² of overall EU methane emissions** (approximately 0.6 % of the total EU GHG emissions). These originate from: (1) fugitive emissions (unintentional leaks from equipment or components – most challenging to quantify); (2) venting (intentional releases due to safety considerations, equipment design or maintenance/operational procedures) and (3) incomplete combustion³. Between 1990 and 2017, **industry initiatives have already led to a 56%⁴ reduction in fugitive methane emissions** from natural gas activities.

Over the past years, GasNaturally Members have contributed to gaining a **better understanding of the methane emissions** in the gas sector. An example is the **Methane Guiding Principles⁵** (MGPs), developed by a coalition of industry, international institutions, NGOs and academics, and is supported by a majority of GasNaturally Members. One of the actions undertaken by the MGP is the development of a set of best practice guides⁶ for reducing methane emissions. Some of the EU gas industry players have contributed to the development of the **Oil & Gas Methane Partnership⁷** (OGMP) reporting framework (“Golden standard”).

Many gas companies have set **voluntary reduction targets** for their overall GHG emissions (including methane) and in some cases specific targets on methane emissions reduction. The report on *Potential ways the gas industry can contribute to the reduction of methane emissions*⁸ developed by GasNaturally Members GIE and Marcogaz gives an overview of reduction targets set by upstream, midstream and downstream gas companies. These targets are an example of the commitments and

¹ <https://ec.europa.eu/eurostat/statistics-explained/pdfscache/9273.pdf>

² <https://www.eea.europa.eu/publications/european-union-greenhouse-gas-inventory-2019>

³ <https://www.gie.eu/index.php/gie-publications/methane-emission-report-2019/27786-gie-marcogaz-report-for-the-madrid-forum-potential-way-gas-industry-can-contribute-to-the-reduction-of-methane-emissions/file>

⁴ <https://www.eea.europa.eu/publications/european-union-greenhouse-gas-inventory-2019>

⁵ <https://methaneguidingprinciples.org/>

⁶ <https://methaneguidingprinciples.org/best-practice-guides/>

⁷ <https://ccacoalition.org/en/activity/ccac-oil-gas-methane-partnership#:~:text=The%20Climate%20and%20Clean%20Air,New%20York%20in%20September%202014.>

⁸ Table 13, p. 76., <https://www.gie.eu/index.php/gie-publications/methane-emission-report-2019/27786-gie-marcogaz-report-for-the-madrid-forum-potential-way-gas-industry-can-contribute-to-the-reduction-of-methane-emissions/file>

future efforts of the gas industry to achieve additional methane emissions reductions. Moreover, GasNaturally members GIE, MARCOGAZ and IOGP published first common industry guidelines⁹ to help companies set methane emission reduction targets as complement to mitigation strategies.

The gas industry uses mainly **bottom-up technologies** to detect and quantify its emissions. Bottom-up assessments provide detailed information about emissions from equipment and operations and facilitates to put in place mitigation measures. **New technologies, such as aircraft, satellite or drone-based measurements, digitalisation**, etc., will help to improve methane emissions detection, and quantification and build on the existing methane management efforts. As the technology develops, such **top-down**, site-level measurements could be used in combination with bottom-up approaches.

A large number of **best available techniques** (BAT) exist to reduce methane emissions and the gas industry implements these on a regulated or voluntary basis. The BATs are related to engineering design, commissioning and operation, including maintenance and repairs, and decommissioning. An important BAT for reducing fugitive emissions and ensuring the safety of the assets is the **Leak Detection and Repair (LDAR) programmes**, which can be implemented for a variety of technical and operational solutions.

To continue the progress in reducing methane emissions, the gas industry launched an **Action Plan**¹⁰ based on the challenges and gaps identified in the abovementioned GIE/Marcogaz report, aiming at ensuring accuracy and harmonisation, developing cost-effective and flexible policies, continuously improving and stimulating innovation, taking a balanced and holistic approach and engaging all sectors and non-EU stakeholders.

How the EU can support the gas industry to further reduce methane emissions

GasNaturally supports the European Commission in developing an ambitious EU Methane Strategy, focusing on measures to effectively reduce methane emissions and on the improvement of data accuracy along the gas value chain. Our Members support the Commission's work on this global issue and we stand ready to offer our expertise in this field to help achieve the climate neutrality objective.

We believe that the following points should be considered in the context of the upcoming EU Methane Strategy:

- **A multi-stakeholder approach** to developing EU initiatives related to methane emissions including the gas industry, to ensure that the proposed measures are workable and effective.
- **Flexibility** for the gas industry to implement those tools and available technologies that allow to achieve the highest emissions reduction at the lowest cost and in the shortest time.
- A well-structured, robust and fit for purpose standard on **Monitoring, Reporting, and Verification (MRV)** of methane emissions, to provide stakeholders with consistency and transparency in the emissions data provided by companies. Therefore, we suggest that the EU contemplate the development of a robust MRV standard applicable inside the EU and promotes its use also outside the EU.
- Work on **methods to compare top-down vs. bottom-up measurements**, and more generally, different methods for estimating methane emissions from gas infrastructure and other sources, in order to establish the methods and application guidelines.

⁹ [WG ME-675](#) (public document)

¹⁰ <https://www.gie.eu/index.php/gie-publications/methane-emission-action-plan/28053-action-plan-methane-emissions/file>

- A **single methane emissions reporting framework** to improve the accuracy of emissions data and reduce the administrative and technical burdens on the companies.
- **Accurate data.** The consideration of any methane intensity objective-based policy measures should be built on the basis of **accurate data**. Therefore, it is necessary to implement a **standardized methodology for the identification and quantification of methane emissions**. For example, for the mid- and downstream parts, MARCOGAZ has developed the ‘Assessment of methane emissions for gas Transmission and Distribution System Operators’¹¹ (currently working with the CEN to bring this document into a CEN Technical Report). For the upstream part, IPIECA, IOGP and OGCI are starting their work on a common set of industry recommended practices (on detection and measurement-based quantification technologies) that may be transformed into standards in the future.
- A **robust innovation agenda**. Gas will continue to play a key role in the EU’s energy landscape, which means that creating incentives to **promote innovation and new technologies and practices** in tackling methane emissions across the European gas supply chain should be among the priorities of the EU’s agenda on decarbonisation. New technologies and practices have the potential to increase the cost-effectiveness of methane reductions over time and policy should be flexible to allow for the inclusion of new, innovative solutions over time.
- **Establishment of an international methane emissions mechanism** aimed at improving credibility and transparency, funded, scoped and governed by Governments and IGOs, and ensuring a level playing field for the rest of the stakeholders.
- **Exploiting synergies**. While welcoming the fact that the Methane Strategy will cover energy, agriculture and waste sectors, we believe the strategy should exploit the synergies between these sectors (e.g. biomethane production and injection into the gas grid).
- **Cooperation with non-EU countries**. The EU can share, strive for consistency and foster the impact of EU methane emission policies and help to disseminate best practices for cost-effective methane emission reductions across value chain segments. The upcoming policies should be accompanied by active EU dialogues with the governments of the gas supplying countries.

GasNaturally is a partnership of eight associations (Eurogas, Natural & bio Gas Vehicle Association (NGVA Europe), European Gas Research Group (GERG), International Gas Union (IGU), International Association of Oil and Gas Producers (IOGP), Gas Infrastructure Europe (GIE), Liquid Gas Europe (LGE) and Marcogaz) that together represent the whole European gas value chain. Our members are involved in gas exploration and production, transmission, distribution, wholesale and retail operations, as well as gas in transport.

¹¹ [WG ME-485](#) (public document).