

# IOGP Europe position on the international GHG Supply Chain Emissions Measurement, Monitoring, Reporting, and Verification (MMRV) Framework

IOGP Europe supports the development of an international GHG Supply Chain Measurement, Monitoring, Reporting, and Verification (MMRV) framework that enables comparable and reliable information on methane, carbon dioxide, and other GHG emissions across the supply chain and provides market participants with verified information about life cycle GHG emissions volumes and intensity from pre-production through delivery. Natural gas and crude oil are globally traded commodities, and a global framework is required to avoid undue barriers to trade, support development of low GHG intensity energy markets, and contribute to security of energy supply.

## Key considerations in MMRV framework development

- **Compatibility across the supply chain:** it is paramount that the MMRV framework is compatible with every part of the supply chain and considers the realities of gas markets. Internationally, natural gas value chains are characterized by a wide array of configurations, ranging from simple setups with few assets to complex systems involving multiple custody transfers and extensive pipeline networks spanning thousands of kilometers.
- **Support for rapid technological uptake:** an effective MMRV framework should recognize that technology is rapidly developing and, whilst not anticipating on future technologies not yet available, allow for / support that rapid uptake of technologies. Monitoring capabilities for methane emissions vary among measurement technologies and their accessibility differs across various geographic regions.
- **Leveraging existing initiatives:** the framework should leverage, to the extent possible, the diverse regulatory and voluntary initiatives established across different jurisdictions. By doing so, a consistent and unified process standard for MMRV of GHG emissions can be developed to limit unnecessary complexity and duplication in reporting. Any framework should be aligned with the general methodologies of ISO 14067 (i.e. GHG – Carbon footprint of products – Requirements and guidelines for quantification).
- **Considerations for verification and assurance:** considerations for verification, assurance, and accreditation methods in GHG monitoring should consider cost-effectiveness, scalability, and feasibility across diverse geographical contexts. Reported data should be either primary data from operators along the natural gas value chain where practical and applicable, or data from a 3rd party source that accurately reflects their specific GHG emissions; and should be verified by the government / relevant government agency or an accredited independent verifier. Individual gas suppliers should be given the possibility to prove their facilities' emissions intensity versus requiring a default level. This can be achieved using Guaranties of Origin schemes.

## Specific considerations for methane emissions

- **Recognizing existing, mature and proven MMRV practices:** the new MMRV framework should strive to encompass to the maximum extent possible existing, mature and proven MMRV practices in major jurisdictions. For example, while the EU Methane Regulation seeks alignment with the OGMP 2.0, several LNG exporting nations (e.g. the US, Australia) operate under distinct regulatory reporting frameworks based on different protocols. For example, the US EPA's Subpart W includes a pathway for direct source-level emissions measurement for some sources, which is in contrast to the EU Methane Regulation.
- **Alignment with existing approaches:** aligning with and building upon globally recognized harmonized MMRV approaches, such as the GIIGNL MRV Framework or OGMP 2.0 reporting framework for methane emissions, provides significant benefits, whilst recognising the MMRV framework has a broader scope than just methane emissions. For example, the OGMP 2.0 framework includes robust Technical Guidance Documents (TGDs) developed in collaboration with a wide range of stakeholders. The adaptability of the framework to incorporate technological advancements is a key strength that could be mirrored in the new MMRV framework.

In conclusion, IOGP Europe is committed to supporting the development of an international MMRV framework that promotes transparency, consistency, and comparability in emissions data. By incorporating industry perspectives, leveraging existing initiatives, and allowing for technological flexibility, we can create a robust framework that meets the diverse needs of the global natural gas industry. Aligning with recognized standards and ensuring compatibility across the supply chain will be critical to the framework's success.

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