

Supporting document to IOGP Europe response to DG ENVI and Trinomics survey on assessment of environmental reporting and the potential for simplification

Introduction

The European upstream oil and gas sector operates within a highly regulated framework that ensures safety, minimizes environmental impacts, and promotes transparency. Existing national, regional, and international regulations already impose extensive reporting obligations on the industry. **A 2016 European Commission study¹ confirmed that environmental pressure from upstream oil and gas operations in Europe is low, thanks to the robustness of this regulatory environment. The OSPAR Quality Status Report 2023² further illustrates the sector's progress, particularly in reducing emissions in the North Sea region.**

Despite this strong track record, the current structure of the Industrial Emissions Portal Regulation (IEP-R) does not fully reflect the operational realities of the oil and gas sector. It often introduces additional burdens without clear environmental benefits, diverting resources from meaningful environmental improvements and potentially hindering the sector's ability to deliver secure and reliable energy—especially during times of geopolitical uncertainty and shifting global supply chains.

The oil and gas industry is fully committed to further reducing its environmental footprint and supports efforts to enhance environmental transparency. However, to make reporting more effective and less burdensome, the IEP-R framework needs to be improved:

- Introducing a capacity threshold,
- shifting from installation-level to facility-level reporting,
- avoiding duplication with existing regulations, simplifying processes, and
- ensuring proportionality between effort and data use would significantly enhance the system's efficiency and relevance.

IOGP Europe welcomes the opportunity to contribute to the ongoing assessment of environmental reporting obligations. Simplifying and rationalising these requirements is essential to fostering sustainable economic growth while maintaining compliance with environmental standards.

We fully support the European Commission's objective to reduce reporting burdens by 25% (and by 35% for SMEs), as announced by President von der Leyen in March 2023 and reaffirmed in the Budapest Declaration of November 2024.

We are pleased to provide additional insights on reporting challenges and areas for potential simplification through this supplementary document and remain open to further engagement, including follow-up discussions where relevant.

¹ Study on the assessment and management of environmental impacts and risks resulting from the exploration and production of hydrocarbons by DG ENVI and Amec Foster Wheeler Environment and Infrastructure UK <https://op.europa.eu/en/publication-detail/-/publication/22f6e2e1-9aa7-11e6-868c-01aa75ed71a1>

² <https://oap.ospar.org/en/ospar-assessments/quality-status-reports/qsr-2023/synthesis-report/key-messages/>

Section 2 – Reporting costs

Please note that our response to this section in the survey reflects the average reporting burden per company within IOGP Europe's Membership, rather than the cumulative totals for all members. The figures presented are based on the average reporting experience of each individual member company.

Section 3 – Suggestions for improvement

IOGP Europe appreciates the opportunity to contribute to the ongoing discussion on improving the effectiveness and efficiency of environmental reporting under the Industrial Emissions Portal Regulation (IEP-R).

IEP-R reporting will come into effect for the reporting year 2027, replacing the previously governed E-PRTR.

IEP-R presents several challenges that place a significant burden on the oil and gas upstream sector, particularly regarding the granularity and level of reporting and duplication across existing regulations.

Lack of capacity threshold

A key concern is the lack of a capacity threshold for crude oil and gas extraction activities in Annex I of the regulation.

Article 6 of the IEP-R establishes the reporting obligations for installations that carry out activities listed in Annex I and meet or exceed the applicable capacity thresholds specified therein. It states that operators must report annually if they release pollutants listed in Annex II above the relevant thresholds or exceed the specified waste thresholds. However, Annex I does not specify a capacity threshold for the extraction of crude oil and gas.

Without such a threshold, even small-scale installations with negligible or "zero" emissions, such as a single well pad, are required to submit reports. This will result in an overwhelming number of submissions with little to no environmental relevance while creating a significant administrative burden on operators.

For instance, in Germany, in order of magnitude of key air pollutants (CO₂, CH₄, SO₂, NO₂, CO) from Oil and Gas Production and Exploration activities is only 0.02% to 0.2%³ of all emissions on a national level, with many smaller sites generating emissions so low that including them in reporting systems only complicates the process without providing substantial environmental benefits. Under the current legislation, these small, low-impact installations would still be required to submit reports despite the installations negligible environmental impact.

Additionally, Article 15(2)(b) that allows for an amendment to annexes in the regulation emphasizes that thresholds should be set to capture at least 90% of the release of pollutants to air, water, and land from activities in Annex I. However, the absence of a capacity threshold means that, under the current framework, 100% of oil and gas installations, regardless of their emissions, are required to report. This approach is inconsistent with the legislative goal of capturing 90% of pollutant releases, as it places the oil and gas sector under a 100% reporting obligation and contradicts the intended proportionality and efficiency of the regulation, which de facto creates unjustified disparities and violates the EU principle of equal treatment and risks legal challenges.

To address this, we strongly recommend that a capacity threshold be introduced for oil and gas extraction activities in Annex I.

- **IOGP Europe proposes the addition of "Crude oil or gas production and/or treatment installations with an average annual production and/or throughput that exceeds 500 000 cubic metres/day of gas or 500 tonnes/day of crude oil" to replace the current absence of any threshold for our sector** will ensure that reporting efforts are proportional to environmental impact. This threshold is also in line with Annex I point 14 of the EU Environmental Impact Assessment Directive (Directive 2011/92/EU), which establishes reporting requirements for the extraction of petroleum and natural gas.

³ See Appendix A - Observations based on European Commission Staff Working Document (2022)111 focusing on example of Germany, page 6

Reporting level (facility vs installation)

One of the challenges within the IEP-R framework is the distinction between installations and facilities. Recital (11) explicitly states that reporting should be done at the installation level in order to create synergies with databases and to align with other environmental laws, such as the Industrial Emissions Directive (IED). However, this approach creates significant difficulties for the upstream oil and gas sector, where numerous individual wells and processing units are connected to larger facilities.

An installation is defined under IEP-R as a stationary technical unit within which one or more activities listed in Annex I are carried out, and any other directly associated activities on the same site that have a technical connection with the activities listed in that Annex and which could have an effect on emissions and pollution. However, this may mean that each well and associated processing unit could be classified as a separate "installation" necessitating detailed and separate reports for each. In Germany, for example, the facility to installation ratio is in general not 1:1 and can be anywhere from 1 to 210 installations per facility (see draft guidance report⁴). This leads to excessive, unnecessary and granular reporting, especially for minor wells or small processing units that generate negligible emissions.

- **IOGP Europe recommends that reporting be done at the facility level, which would allow for more practical, less burdensome reporting requirements, especially for small and low-impact installations that are part of larger, integrated operations.** Reporting at the facility level would better reflect the overall environmental impact, streamline administrative processes, and reduce the unnecessary granularity that currently exists at the installation level.

We have included pictures in the Appendix A⁵ at the end of this document to illustrate the size of some of these installations, as well as to clarify the difference between installation and facility in the context of our sector.

Granularity and proportionality of reporting

Another issue within the IEP-R is the level of detail required in reporting. The current approach requires highly granular data collection from all installations, including minor processing units, regardless of their environmental impact. The requirement for detailed reporting from low-emission sources leads to a high volume of low value data that does not contribute to environmental improvements or policy decisions and does not provide the general public with meaningful information.

For example, in many regions, a small number of large facilities are responsible for the vast majority of emissions. Despite this, all sites are subject to the same stringent reporting obligations which is disproportionate to their impact.

Additionally, the IEP-R mandates extensive emissions analysis, even when existing environmental permits do not require them. This includes the frequent stack testing for air emissions, extensive wastewater sampling including parameters present only at trace levels and additional monitoring obligations. These requirements add significant complexity and administrative burden, often leading to reliance on certified laboratories and specialized contractors for testing, advanced IT systems for managing and processing detailed submissions, and additional personnel training to meet reporting obligations.

- **IOGP Europe recommend prioritizing aligning pollutant lists and reporting thresholds across all Member States.** Currently, manual input processes in many Member States are time-consuming and some Member States modify the input template each year, often close to the reporting deadline. Automating the input process and establishing a standardized EU-wide template can streamline data collection, verification, and submission, further reducing the burden on operators and authorities.

To improve efficiency and usefulness of data, Member states should only request additional data when it is truly needed for environmental decision making, such as the number of spills or details on CO₂ emissions as opposed to imposing high-frequency monitoring for small sources like combustion plants.

⁴ [Industrial reporting – Eionet Portal](#)

⁵ See Appendix B – Illustrative examples of installations vs. facilities, page 7

- **IOGP Europe propose centralizing the data review process at the Member State level and ensuring the involvement of site inspectors who are familiar with site operations during the review phase to reduce unnecessary follow-up questions.** This would allow for more context-aware and meaningful engagement with the data and improve accuracy of submissions.
- **IOGP Europe propose a cost/benefit assessment to ensure proposed changes provide tangible environmental benefits without excessive administrative costs** before altering the pollutant list or thresholds.
- **IOGP Europe request updating the guidance document, last revised in 2006, to include a list of indicative pollutants for each sector.** This would help operators focus on the most relevant pollutants, improving data accuracy and reducing unnecessary reporting.

Duplication of reporting obligations

Another challenge is the duplication of reporting obligations. Many oil and gas extraction activities are already covered by other regulatory frameworks. For example, around 90% of hydrocarbon production in Europe takes place in the North Sea and North-East Atlantic and therefore activities in these regions are covered by the OSPAR Convention (The Convention for the Protection of the Marine Environment of the Marine Environment of the North East-Atlantic). The IEP-R framework does not fully account for these existing obligations, leading to redundant data collection and unnecessary administrative burden.

Similar overlaps also exist with regulations like the Medium Combustion Plants Directive, the Urban Waste Water Treatment Directive, and the Water Framework Directive. Aligning reporting requirements across these regulations would reduce redundancy and streamline the process.

- **IOGP Europe request avoiding duplication of reporting obligations across different regulations.** Reporting obligations that intersect with other EU directives should be reviewed to ensure they are complementary rather than redundant.
- **IOGP Europe recommend defining clear criteria for when Member States may request additional data as currently, Member States request data that is already covered in other legislation.**
- **IOGP Europe also propose to streamline environmental legislation, positioning the IEP-R as the primary reporting hub,** harmonizing reporting obligations across EU directives while complementing and integrating with existing frameworks like OSPAR.

Unnecessary contextual and commerciality sensitive information

As part of the IEP-R, companies will be required to publish regulatory information such as permit documents alongside environmental information.

Recital 9 of IEP-R outlines that the aim of the portal is to “(...) provide (...) a further integrated and coherent dataset on key environmental pressures generated by industrial installations, since such data constitute a cost-effective tool for drawing comparisons and taking decisions in relation to environmental matters, encouraging better environmental performance, tracking trends, demonstrating progress in pollution reduction, benchmarking installations, monitoring compliance with relevant international agreements, setting priorities and evaluating progress achieved through Union and national environmental policies and programmes.” Given that the regulation is intended to provide insights into key environmental pressures means that the inclusion of non-environmental contextual data does not contribute meaningfully to this objective and does not align with the core purpose of the IEP-R. Furthermore, requiring operators to disclose commercially sensitive information raises concerns regarding data confidentiality.

- **IOGP Europe propose that only relevant environmental data be reported, and confidential business information and sensitive data should be redacted.** This will ensure efficiency and effectiveness of the system while reducing unnecessary burdens on businesses.

Complex data collection

A further concern arises from the data collection hierarchy outlined in Recital 19 and Article 6(3), which prioritizes direct measurement as the most accurate quantification method, followed by calculation, and then estimation. While direct measurement is important in certain situations, placing undue emphasis on it can strain reporting systems, especially when reliable estimation or calculation methods are already available.

The current hierarchy may not always be practical or technologically feasible for smaller installations or low-emission sites where direct measurement may be costly or unnecessary. Operators are required to specify the method used for obtaining data, whether through measurement, calculation, or estimation, which adds complexity to the reporting process. This approach may lead to inefficiency, especially in cases where more practical and cost-effective estimation methods can provide sufficient and reliable data.

- **IOGP Europe recommend adopting a more balanced approach that allows for greater flexibility in data collection,** recognizing the validity of estimation and calculation methods where appropriate. This will streamline the reporting process, reduce unnecessary administrative burdens, and better align with existing practices in the sector.

Section 4 – Additional comments

The European oil and gas upstream sector operate under a highly regulated framework that ensures safety, minimizes environmental impacts, and maintains transparency. Existing national, regional, and international regulations already impose comprehensive reporting obligations on the industry.

A 2016 European Commission study⁶ found that the environmental pressure from European upstream oil and gas operations is low, as these activities are managed within a robust regulatory framework. Additionally, the OSPAR Quality Status Report of 2023⁷ illustrates the reduction of our emissions in the OSPAR region, mainly the North Sea.

Despite this, IEP-R requirements do not fully account for the realities of oil and gas operations and often introduce additional burdens without clear environmental benefits.

It's important to recognize that the oil and gas sector plays a critical role in ensuring Europe's security of supply, especially in times of energy uncertainty. With changing global supply chains and ongoing geopolitical challenges, maintaining a reliable energy supply is crucial for Europe's stability and economic resilience. While the industry continues to focus on reducing its environmental footprint, it's equally important that reporting obligations do not jeopardize its ability to ensure reliable energy delivery.

In addition, the industry is continuously striving to reduce its environmental footprint, and the IEP-R plays an important role in environmental transparency, but its current structure presents several inefficiencies that place an unnecessary burden on businesses and authorities. By introducing a capacity threshold, shifting from installation-level to facility-level reporting, preventing duplication across regulations, simplifying reporting processes, and ensuring proportionality between reporting effort and data use, the system can be significantly improved. These measures would ensure that reporting obligations remain meaningful, efficient, and aligned with the broader goal of environmental protection. IOGP Europe remain open to further discussion and welcome your response.

⁶ Study on the assessment and management of environmental impacts and risks resulting from the exploration and production of hydrocarbons by DG ENVI and Amec Foster Wheeler Environment and Infrastructure UK <https://op.europa.eu/en/publication-detail/-/publication/22f6e2e1-9aa7-11e6-868c-01aa75ed71a1>

⁷ <https://oap.ospar.org/en/ospar-assessments/quality-status-reports/qsr-2023/synthesis-report/key-messages/>

Appendix A – Observations based on European Commission Staff Working Document (2022)111 focusing on example of Germany

The detailed evaluation of the Staff Working Document for IED and IEP (SWD(2022)111), pages 559-569, and a comparison with information from one of our members has shown substantial discrepancies.

Please consult the table below for additional detail on oil and gas extraction sector in German:

SWD(2022)111 (tableA8) – data based on TSS	BVEG Annual Report 2021*
469 wells (“drillings”)	>2.000 sites (active + inactive) for oil and gas extraction, without plugged and abandoned wells (2.435)
<3.400 employees in oil and gas sector (“drillings”)	7.669 employees for oil and gas extraction

* BVEG (Bundesverband Erdgas, Erdöl und Geoenergie e.V.) is the German association representing the oil, gas and geothermal industry and their annual report 2021 is publicly available under the following link address:

<https://www.bveg.de/wp-content/uploads/2022/03/BVEG-Jahresbericht-2021.pdf>

Further observations:

- SWD(2022)111 describes doubts on clarity of figures submitted during TSS Impact Assessment Report and missing capacity / production thresholds for relevance of oil and gas installations.
- The administration costs for operators and authorities are described in wide ranges with significant uncertainties.
- SWD(2022)111 ignores that main sources in the oil and gas sector are already covered by IED/PRTR (e.g. LCPs).
- No evidence provided with facts on environmental pressures from oil and gas operations, only opinions from TSS (figure A8-30).

Table 1. Key emissions from oil and gas Exploration and Production (E&P) activities in Germany

	German E&P Industrie [BVEG]	Germany [UBA*]	EU [EAA**]	Unit	Stand	Ratio E&P/Germany
CO ₂	1,4	707	3.290	Mio t	2019	0,20%
CH ₄	0,4	2.000	16.968	1.000 t	2019	0,02%
SO ₂	3,2	260	1.649	1.000 t	2019	1,23%
NO ₂	0,6	1.106	6.141	1.000 t	2019	0,05%
CO	2,1	2.753	17.568	1.000 t	2019	0,08%

* UBA UBA (3_tab_emi-ausgew-luftschadst_2022.pdf) and (4_tab_emi-ausgew-thg-kat_2022.pdf)

** [EEA greenhouse gases - data viewer — European Environment Agency \(europa.eu\)](https://www.eea.europa.eu/en/data-and-maps/greenhouse-gases)

(Total Emissions (UNFCCC), excluding LULUCF, as reported in the CRF tables to UNFCCC.)

Appendix B – Illustrative examples of installations vs. facilities

Typical onshore Oilfield set up (simplified)

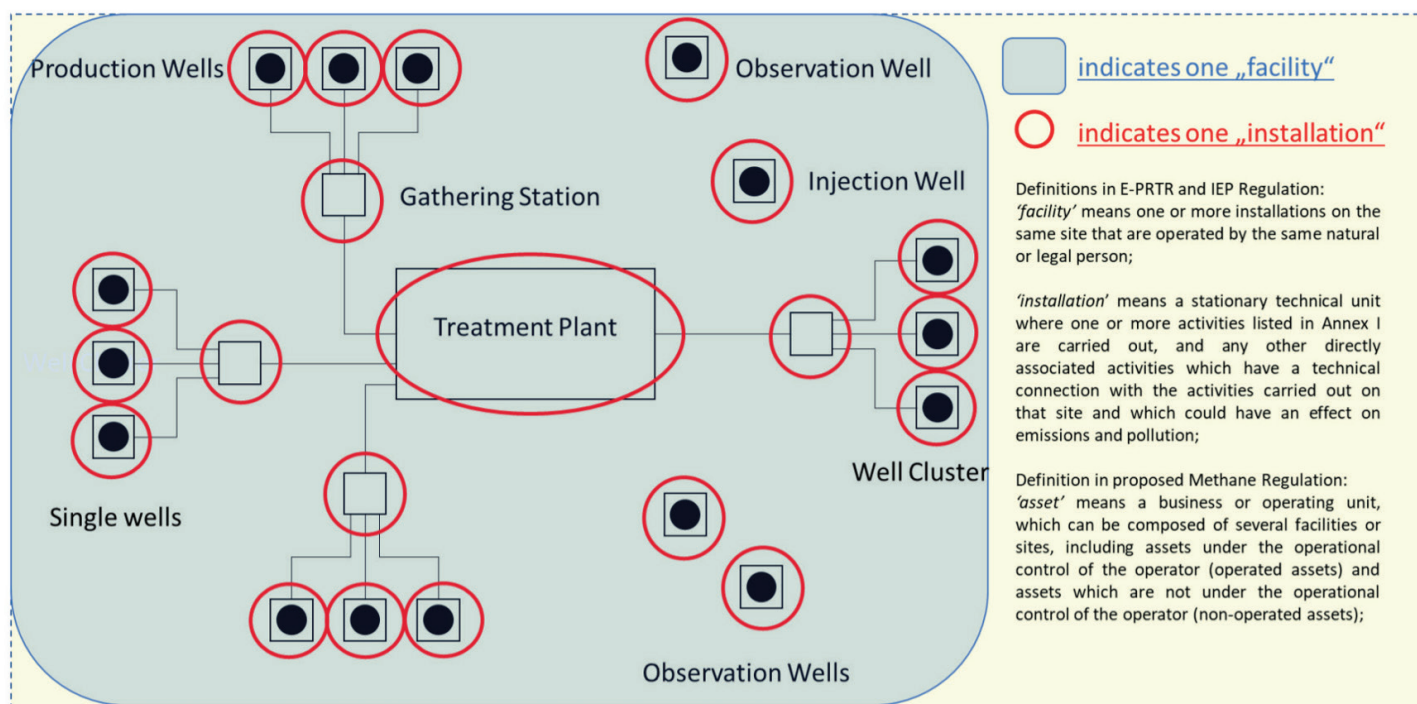


Diagram 1: The distinction between “facility” and “installation” in oil and gas extraction activities



Picture 1: illustrating multiple productive units (installations) in an oil field (facility) extracting from the same underground oil reserve



Picture 2 and 3: Onshore single oil well



Picture 4: Single oil well rod sucker pump installation in Germany

Assessment of environmental reporting and the potential for simplification - Survey on reporting costs data

Fields marked with * are mandatory.

Introduction

This survey is a follow up of the webinar on the “**assessment of environmental reporting and the potential for simplification**”, organised by Trinomics, in cooperation with WSP and Ricardo, as part of their study for the Commission's Directorate General for Environment (DG Environment).

This study is a successor to the Fitness Check on Monitoring and Reporting in environment policy published in 2018, which focused on simplifying and streamlining reporting obligations (RO) under the remit of the DG Environment. The Fitness Check informed the revision of several legislative acts, and amendments were adopted as an omnibus legislative act in 2019. Reporting obligations (ROs) are requirements for businesses or organizations to provide information or data to authorities or institutions. The present study will update the findings of the Fitness Check, with a particular focus on business obligations. Obligations for competent authorities to report to the Commission are also covered, as these often depend on reporting by businesses.

The project team is collating data on reporting costs, to establish a baseline estimate of costs. This involves addressing gaps and making informed estimates where necessary. Additionally, we aim to develop ideas for simplification and streamlining of reporting.

The purpose of this survey is to find information on:

- Business and Member States reporting costs, especially where the available data is lacking;
- Ideas for improving the efficiency and effectiveness of reporting.

The survey is being distributed amongst attendees of the webinar on “Assessment of environmental reporting and the potential for simplification” held on 13 February 2025 and of registrants for the above-mentioned webinar provided that they have granted us consent to be contacted for further consultation activities.

In the context of the present survey, you will have the possibility to indicate your interest for being contacted for a targeted follow-up interview amongst a sample of participants to the survey. Please note however that interviews can only be conducted with a limited number of participants, hence an expression of interest on your behalf may not result in an invitation.

The survey is structured as follows:

- **Section 1** gathers information on the survey participant, notably sector, and reporting obligations of interest.
- **Section 2** explores the costs of reporting; and
- **Section 3** collects suggestions for improvement.
- **Section 4** includes a few closing questions.

Please note that due to the technical limitations of EUSurvey, you will only be able to provide your input in relation to one legislative instrument. If you wish to submit your input in relation to more than one legislation, we kindly ask you to make several submissions using the survey form.

Replies to this consultation will be integrated into the report for this study (for further information, please consult the privacy statement).

Filling in the questionnaire should not take longer than 10 minutes. For your convenience, we are also attaching a copy of the survey to aid in collecting inputs for the survey.

[EnvReportingCosts_Survey.docx](#)

Please, download and read the privacy statement

[Privacy statement EnvReportingSurvey.pdf](#)

- * Please confirm you have read the privacy statement and indicate your reply regarding the treatment of your survey response.

Please note: regardless of the option chosen below, your contribution may be subject to a request for access to documents under Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.

- Can be published, including your name or that of your organisation (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
- Can be published in an anonymous way (I consent to publication of all information in my contribution except my name/the name of my organisation, and I declare that none of it is under copyright restrictions that prevent publication)
- Cannot be published but only used for statistical and analytical purposes

Section 1 - Survey participant information

- * Your name:

Gabrielle van Melkebeke

- * Your e-mail address:

gvm@iogp.org

* Please indicate the name of the organisation on behalf of which you are replying:

IOGP Europe

* 1. Are you replying to this questionnaire as/on behalf of:

- Private individual
- Non-governmental organisation
- Business
- Business representative (responding on behalf of multiple companies)
- Public Authority
- European Institution or Agency
- Academic/research institute
- Other

For trade associations – what percentage of your members affected by this reporting obligation are SMEs?

- From 1 to 10%
- From 10 to 30%
- From 30 to 50%
- From 50 to 70%
- From 70 to 90%
- More than 90%

* 2. Which sector are you in?

Please, check https://ec.europa.eu/competition/mergers/cases/index/nace_all.html

- A - Agriculture, forestry and fishing
- B - Mining and quarrying
- C - Manufacturing
- D - Electricity, gas, steam and air conditioning supply
- E - Water supply; sewerage; waste management and remediation activities
- F - Construction
- G - Wholesale and retail trade; repair of motor vehicles and motorcycles
- H - Transporting and storage
- I - Accommodation and food service activities
- J - Information and communication
- K - Financial and insurance activities
- L - Real estate activities
- M - Professional, scientific and technical activities
- N - Administrative and support service activities
- O - Public administration and defence; compulsory social security
- P - Education
- Q - Human health and social work activities
- R - Arts, entertainment and recreation
- S - Other services activities
- T - Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use
- U - Activities of extraterritorial organisations and bodies

* 3. In which Member States are you active?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- EU as a whole

* 4. Under which **policy area** fall the legislative instrument (Directive and/or Regulation) with which you have experience with?

(The next question will let you select a concrete legislative instrument.)

- Waste
- Chemicals / products
- Water
- Air quality / emissions
- Governance
- Nature
- Industrial emissions / accidents / noise

Which **industrial emissions / accidents / noise** legislation would you like to respond to?

7. Regulation 2024/1244 of the European Parliament and of the Council of 24 April 2024 on reporting of environmental data from industrial installations, establishing an Industrial Emissions Portal and repealing Regulation (EC) No 166/2006)

Section 2 - Reporting Costs

6. What do you report on (e.g. fill in waste transfer notes, report emissions from an industrial installation, report how much fertiliser is applied, report emissions to river/sea/ lake from a water treatment plant)?

Our Participants report on:

- Emissions of hazardous substances to air, such as heavy metals and PAHs
- Discharges from wastewater treatment plants
- Environmental monitoring under the Water Framework Directive
- EU reporting requirements through national authorities (since this is done per site, it results in a high reporting volume)
- Under CSRD, ESRS Set 1 (the requirement for audits, the time spent calculating discharges to sea has multiplied, often exceeding seven hours per asset.)

All of these legislations create duplication of reporting requirements and require significant effort for monitoring, calculation, assurance audit and reporting.

7. How many reports / submissions per year do you complete?

(per site and/or in total – per MS or for whole of EU) (rooting the question, depending on the type of respondent – phrased to suit the nature of the respondent – i.e. single company, single site, or company with multiple sites, or trade association with multiple companies.)

- From 1 to 10
- From 10 to 20
- From 20 to 30
- More than 30

8. How many hours are required to fill in a report (collect, compile, and submit)?

- Less than 1 hour
- From 1 to 2 hours
- From 3 to 4 hours
- More than 4 hours

Please specify:

The majority of reports relate to the ETS, which imposes significant requirements regarding data quality, verification audits and compliance checks. As a result, these reports are highly time-consuming. On average, completing one of these reports requires between 5 and 7 hours.

9. Rank these administrative tasks - *from most unnecessary / burdensome tasks to least burdensome tasks*

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ Information labelling for third parties

⋮ Notification of (specific) activities (e.g. for transportation of dangerous cargoes)

- ⋮ Registration (e.g. entry in a business register or a professional list)
- ⋮ Application for individual authorisation or exemption (i.e. authorisation required each time a particular task has to be carried out)
- ⋮ Cooperation with audits
- ⋮ Undertaking an (environmental) impact assessment
- ⋮ Inspection (e.g. monitoring the conditions for employees)
- ⋮ Application for general authorisation or exemption (e.g. licence granting permission to engage in an activity), permitting.
- ⋮ Certification of products or processes
- ⋮ Other

If other, please specify:

10. How many hours do you spend in audits and inspections for reporting?

- Less than 1 hour
- From 1 to 2 hours
- From 3 to 4 hours
- More than 4 hours

Please specify:

11. How many hours do you spend in registrations and approvals for reporting?

- Less than 1 hour
- From 1 to 2 hours
- From 3 to 4 hours
- More than 4 hours

12. How many hours do you spend in legal and procedural compliance for reporting?

- Less than 1 hour
- From 1 to 2 hours
- From 3 to 4 hours
- More than 4 hours

13. What is the typical hourly cost of staff involved?

- Less than 10 euros per hour
- From 10 to 20 euros per hour
- From 20 to 30 euros per hour

- From 30 to 40 euros per hour
- From 40 to 50 euros per hour
- From 50 to 60 euros per hour
- From 60 to 70 euros per hour
- More than 70 euros per hour

Please specify:

14. Do you have any other costs:

- IT systems
- Training
- Others

15. Have you experienced any variations in data requests between Member States or regions of Member States (e.g. extra information requests in some jurisdictions that are not requested in others).

- Yes
- No

Please specify:

16. Have you been required to report the same piece of data more than once?

- Yes
- No

How many times?

Our Participants report on:

- Emissions of hazardous substances to air, such as heavy metals and PAHs
- Discharges from wastewater treatment plants
- Environmental monitoring under the Water Framework Directive
- EU reporting requirements through national authorities (since this is done per site, it results in a high reporting volume)
- Under CSRD, ESRS Set 1 (the requirement for audits, the time spent calculating discharges to sea has multiplied, often exceeding seven hours per asset.)

All of these legislations create duplication of reporting requirements and require significant effort for monitoring, calculation, assurance audit and reporting.

Section 3 - Suggestions for improvement

17. Do you have any suggestions for making the reporting obligation(s) you are familiar with more effective and/or efficient?

- Stop requesting some aspects of the information that appears to be not relevant.

- Increase automation (e.g. online/digital submission as opposed to paper)
- Decrease frequency of submissions
- Remove duplication (reporting of the same information for more than one purpose).
- Improve clarity of information requested (e.g. guidance notes)
- Others

Please specify:

Please see IOGP Europe supporting document we will send separately.

Section 4 - Closing questions

18. Are there any other comments and/or remarks you would like to make?

The European oil and gas upstream extraction sector operates under a highly regulated framework that ensures safety, minimizes environmental impacts, and maintains transparency. Existing national, regional, and international regulations already impose comprehensive reporting obligations on the industry. For example, OSPAR Quality Status Report of 2023 shows already the reduction of our emissions in the OSPAR region, mainly the North Sea.

A 2016 European Commission study found that the environmental pressure from European upstream oil and gas operations is low, as these activities are managed within a robust regulatory framework. Despite this, IEP-R requirements do not fully account for the realities of oil and gas operations and often introduce additional burdens without clear environmental benefits.

It's important to recognize that the oil and gas sector plays a critical role in ensuring Europe's security of supply, especially in times of energy uncertainty. With changing global supply chains and ongoing geopolitical challenges, maintaining a reliable energy supply is crucial for Europe's stability and economic resilience. While the industry continues to focus on reducing its environmental footprint, it's equally important that reporting obligations do not interfere with its ability to ensure reliable energy delivery.

In addition, the industry is continuously striving to reduce its environmental footprint, and the IEP-R plays an important role in environmental transparency, but its current structure presents several inefficiencies that place an unnecessary burden on businesses and authorities. By introducing a capacity threshold, shifting from installation-level to facility-level reporting, preventing duplication across regulations, simplifying reporting processes, and ensuring proportionality between reporting effort and data use, the system can be significantly improved. These measures would ensure that reporting obligations remain meaningful, efficient, and aligned with the broader goal of environmental protection. IOGP Europe remain open to further discussion and welcome your response.

Please see IOGP Europe supporting document we will send separately which contains relevant references.

19. Would you be willing to be contacted for a potential follow-up discussion to further explore your insights?

Please note that while we may not reach out to all respondents, we greatly appreciate your willingness to participate.

- Yes

No

Please provide your e-mail address:

Thank you for your participation in this survey!

Contact

env-reporting@trinomics.eu