International Association of Oil & Gas Producers

CONSULTATION RESPONSE | NOVEMBER 2026

IOGP Europe response to European Commission public consultation on draft Implementing Regulation setting templates for methane emissions reporting

We fully support the objectives of the EU Methane Regulation (EUMR), and our Members are actively engaged in the efforts to monitor and reduce methane emissions across their operations. IOGP Europe welcomes the Commission's work to establish harmonised methane emissions reporting templates for EU producers. **A common reporting template, based on data needed for OGMP 2.0 reporting templates, can help standardize data reporting formats from operators, comparability of information reported across member states, and support submissions of methane data to the UNFCCC process.** To achieve these benefits, the templates should build on existing reporting practices, provide clear instructions and avoid unnecessary duplication.

To ensure a clear, proportionate and workable reporting framework, we recommend the following key points:

- **Ensure one submission and avoid duplicate reporting.** Operators should not have to submit the same information through parallel national and EU systems. The final framework should ensure that one submission, through Member States, fulfils the relevant reporting obligation, with Member States retaining responsibility for compliance determinations and transferring relevant data to the Commission without making operator reporting dependent on MTDB availability. Reuse of previously submitted information, including venting and flaring notifications, and bulk upload of existing reporting templates should be enabled. The reporting template should allow operators to provide explanations alongside numerical data including relevant assumptions, methodological limitations and operational circumstances.
- **Clarify reporting boundaries and ensure consistency across reporting frameworks.** Physical reporting boundaries should reflect EUMR definitions and asset-level reporting, while source categories, terminology and table structures should align with the relevant OGMP 2.0 templates and UNFCCC categories. The reference to "site, facility, asset, business/operating unit" leaves the required reporting boundary unclear. The final text should establish clear reporting requirements, allowing appropriate aggregation of wells and small sites, and distinguish the detailed information retained for verification from the information submitted to authorities. Clear aggregation rules and consistent activity definitions are essential to prevent double counting and divergent interpretations.
- **Keep information requirements proportionate and relevant.** Each requested field should have a clear purpose and reflect the activity concerned. The templates should allow non-applicable information to be omitted, particularly for offshore facilities and inactive or plugged wells. Activity-factor and emission-factor reporting should not impose unnecessary work where emissions are established through other quantification methods. The templates should accommodate relevant methods and source categories without introducing additional measurement obligations or creating new reporting obligations for LNG logistics operators.
- **Provide clear reconciliation and verification requirements.** The verifiers' role and responsibilities, supporting documentation requirements and the handling of differing interpretations. Pending a technically robust and consistently applicable methodology informed by the Commission's position on relevant ISO/CEN standards, exclude source – and site-level uncertainty values from the templates. Distinguish reconciliation data from annual emissions reporting, determine whether T5 requires measured or annualised site-level emissions, and allow relevant pre-2025 measurements and reconciliation activities to be recorded. Operators should be able to explain reconciliation efforts and remaining discrepancies in supporting documentation without duplicating separate notifications. Verification

fields should distinguish the assurance level of an engagement from its outcome.

- **Clarify public disclosure and protect confidential information.** The draft envisages public reporting, benchmarking and identification of high-emitting assets and operators. The Commission should specify which information will be published, at what level of detail and how commercially sensitive information will be protected. Remove the requirement for supporting methodology documentation to be similar or equivalent to OGMP 2.0 implementation plans and clarify confidentiality protections for any supporting information provided.
- **Provide flexibility for evolving quantification approaches.** The draft IA appropriately supports engineering calculations, industry emission factors, and other quantification methods. The framework should remain flexible to retain these methods while allowing future methods, such as direct measurement, continuous monitoring systems, and process simulation, consistent with the EUMR and OGMP framework.
- **Ensure comparability of methane transparency database (MTDB) benchmarking.** Future MTDB benchmarking and performance profiling should account for differences in reporting boundaries, quantification methods, measurement coverage, reconciliation approaches and uncertainty treatment to ensure meaningful comparisons across operators.
- **Allow sufficient time and practical arrangements for implementation for both operators and competent authorities.** Companies need adequate time to adapt their systems once the final templates, technical specifications, guidance and reporting interface are available and tested. Mandatory use should start no earlier than the first reporting year (subject to upcoming amendment of the EUMR), reported in May the following year, with final formats, validation rules and a test environment available at least six months before mandatory use, and existing formats accepted during transition. Practical arrangements are also needed where accredited verifiers or competent authorities are not yet operational. Competent authorities will need time to update their reporting tools to match finalized templates from the Commission.

The **attached annex provides detailed comments and recommendations.** IOGP Europe would welcome further technical dialogue with the Commission and competent authorities to support a reporting framework that is consistent, proportionate and workable in practice. As measurement, reporting, and verification requirements for EUMR are finalized, such as the adoption of Article 12 methods (i.e., ISO/CEN) or specific verification protocols, we appreciate that the Commission may need to update these templates to match those requirements.

Annex – Detailed comments and recommendations on the draft reporting templates

IOGP Europe supports common reporting templates and definitions, alignment with OGMP 2.0 reporting templates and reuse of previously submitted information. The following changes would improve clarity and avoid unnecessary reporting work:

Provision	Comment	Recommendation
Annex I, section 1 – Reporting and verification	*The respective roles of the third-party verifier is unclear, particularly regarding technical feedback, data checks and acceptance or approval of reported information.*	*Recommend the respective responsibilities of third-party verifiers and competent authorities in the reporting process, consistent with Article 12(6). Specify how technical feedback, data checks and acceptance of reports should operate, avoiding duplication between the two entities.*
Annex I – Emission types and categories	*Templates use breakdowns of emission types and categories that are inconsistent with OGMP structures duplicating reporting efforts.*	*Apply a consistent emission-type/category structure across value-chain segments, in line with the OGMP 2.0 templates*
Article 4; Annex I, sections 1 and 3 – Application and transition	*Operators need time to adapt reporting systems, inventories and validation processes. The draft does not specify when the templates become mandatory.*	*Specify the application date. We recommend mandatory use from the first reporting year (subject to upcoming amendment of the EUMR) at the earliest (reported in May the following year), with formats, validation rules and a test environment available at least six months beforehand. Continue to accept existing formats during a transition period.*
Annex I, sections 1 and 3 – Single reporting route	*Parallel national and EU portals could require duplicate submissions and create inconsistencies.*	*Operators should report directly to Member States, which remain responsible for compliance determinations. A standardised template would facilitate subsequent data transfer to the Methane Transparency Database, without making reporting dependent on a system that is not yet operational.*

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Annex I, section 1 and point 2(c) – Reporting boundaries and aggregation	*SFABOU leaves uncertainty over whether reporting is required per source, site, asset or company.*	• *Define the reporting boundary, aligning with the EUMR's asset-level reporting.* • *Distinguish submitted information from detailed records retained for verification.* • *Clarify aggregation of similar sources and permit field-level grouping of wells and small sites.* • *Request aggregated data where sufficient, with supporting records available for justified authority requests.* • *Specify how coordinates should be provided for grouped assets.*
Annex I, point 2(c) – Measurement frequency	*The distinction between the granularity used for reconciliation and the level required for reporting its results is also unclear.*	• *Confirm that the IA introduces no additional measurement obligations.* • *Remove prescriptive frequency wording or replace it with a risk-based, technology-appropriate approach.* • *We recommend that site-level measurements are applied in line with OGMP and future ISO/CEN guidelines.* • *Flexibility should be introduced to enable use of continuous monitoring.*
Annex I, point 2(c); Annex II, uncertainty columns and T5 rows – Reconciliation and uncertainty	*Aggregated tables and references to detailed source data do not clearly establish the required granularity.*	• *Pending the Commission's position on the ISO/CEN standards relevant to Article 12, we recommend excluding source – and site-level uncertainty values from the regulatory reporting templates as an interim measure – until a technically robust and consistently applicable methodology is available. Verifiers should assess uncertainty as part of their review of operators' emissions inventories. Discussions within OGMP 2.0 and other partnerships remain ongoing on how uncertainty information can best support methane mitigation.* *Article 12(4) specifies reporting requirements for source-level emissions, locations and methodologies, but does not expressly require uncertainty values. Article 12(6) provides a separate process for addressing discrepancies between source – and site-level results, including notification to the competent authority.* *Allow operators to document their reconciliation efforts and remaining discrepancies accompanying supporting document, without duplicating information provided through the separate discrepancy-notification process.* • *Clarification is needed as to whether T5 row should contain the measured site-level result or an annualised site-level emissions estimate, to ensure consistent interpretation and application by operators and verifiers.* • *Ensure that measurements and reconciliation activities undertaken before 2025 can be recorded and used where relevant to the reporting period. Adjust the date fields to accommodate such information.* • *The EC should clarify how the recently published OGMP 2.0 additional Level 5 reporting template will be incorporated in the final EUMR reporting template.*
Annex I, sections 1 and 2 – Methodology and verification guidance	*Wording on the number and frequency of site-level measurements could introduce additional measurement requirements through a reporting template.*	*Provide binding guidance before reporting starts on methodology documentation, monitoring plans and resolution of differing interpretations. Preserve requests for additional information or resubmission where justified and clearly limited.* *Recommend that a monitoring plan reviewed by the verifier provides sufficient methodology information and that competent-authority approval of that plan is not required.*
Annex I, point 2(f) – OGMP implementation plans and responsibilities	*Reconciliation and uncertainty calculations for methane emissions remain an area of discussion in voluntary programs like OGMP 2.0. The EUMR currently provides insufficient technical guidance on the methodology to be applied to uncertainty quantification.*	*We recommend deletion of point 2(f), due to responsibilities, programme-specific obligations and anticipation of verification requirements and ISO/CEN work.*

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Annex I, section 3 – Disclosure and purpose of data collection	*The reconciliation date field starts in 2025, potentially preventing operators from recording earlier site-level measurements and reconciliation activities undertaken under OGMP 2.0.*	*Specify which information will be public, how confidential information will be protected and the intended use of requested data.* *Recommend that supporting methodology information or implementation plans do not become public.* *Promote dialogue with operators, Member States and competent authorities.*
Annex I, section 3 – MTDB benchmarking and comparability	*Regulatory reporting for purposes of UNFCCC or developing national inventories will ultimately require single numbers at the source level.*	*Ensure that MTDB benchmarking and performance profiling account for these differences and explain material limitations on comparability. Allow relevant contextual information to accompany reported emissions. This should not introduce a requirement to report numerical uncertainty values while the methodology remains unresolved.*
Annex II, footnote ** – disclosure of supporting methodology information	*Required supporting documentation, the role of monitoring plans and handling of disagreements between verifiers and authorities are unclear.*	*Request removal of condition "that is at least similar / equivalent to the OGMP 2.0 implementation plans" as this creates an unnecessary ambiguous term and obligation above EUMR. Request explicit clarification of whether the supporting methodology information or entire OGMP implementation plan would be made public, and which confidentiality protections would apply. The eventual Article 12 reporting process includes reasonable assurance by an independent third-party verifier that makes this type of direct disclosure un-necessary and competent authorities would have the option to request information, such as plans, if that is needed in their role. Default provision would complicate data transmission to EU record systems.*
Annex II, Table 00(j) – Equity share	*The tables combine OGMP upstream and mid-/downstream elements, differ in source naming and ordering, and contain irrelevant categories. Activity boundaries are unclear for integrated facilities.*	*Explain the field's purpose and application, particularly since operators report total emissions irrespective of ownership and remove this item from the template as needed to avoid double-reporting.* *Recommend that submission of an asset-level reporting template by the operator fulfils the compliance obligation for reporting on non-operated partners in that asset, as in Article 12(2)(b). If no data reported by the operator, then CAs should request non-operators of the asset to provide information, after sufficient notice to the operator to rectify.*
Annex II, Table 00(k) – Verification readiness and outcome	*Operating-facility categories are often irrelevant to these wells. We question Table 7's legal basis, responsible parties and source-/site-level measurement implications, particularly where wells are plugged and surface or subsea equipment has been removed.*	*Provide postponement or transitional arrangements for mandatory verification statements until the verification and accreditation framework is operational. Correct the outcome field so limited assurance is not presented as a fallback outcome of a reasonable-assurance engagement. IOGP Europe would welcome an amendment from the Commission to move to limited assurance, but we recognize that the reporting template must match what is in the Regulation.*
Article 2(3), Annex II, emissions tables – AF/EF and quantification methods	*Equipment information does not indicate leakage status and adds administrative work.*	*Remove AF/EF columns or make them explicitly optional in the operative text where appropriate category can be selected, including for direct measurement, continuous calculation, process simulation, engineering calculation, industry emission factor, or other.* *Ensure that the templates and reporting interface accommodate direct measurement, continuous monitoring systems, process simulation, engineering calculations, industry emission factors, reconciled inventories and future methodologies consistent with the EUMR and relevant OGMP 2.0 guidance. Allow operators to identify and explain methods not covered by predefined categories, and update those categories as methodologies develop.*
Annex II, emissions tables – Mandatory fields	*The draft implementing regulation and the reporting templates specify the reporting obligations relating to emissions associated with LNG logistics.*	*Allow omission of non-applicable information. We recommend that only T4/T5 totals be mandatory and that NO/NA/NE/IE notation keys be permitted.*

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Annex II, emissions tables – Combustion classification and units	*In our view, a road cistern, a railway carriage or a maritime transport vessel do not constitute an independent 'asset' within the meaning of the Regulation, but are elements used in the operations carried out by other infrastructure assets, such as LNG facilities.*	*Introduce "Combustion" as a separate category alongside "Leaks", "Vents" and "Flares", and move "Incomplete combustion – non-flaring" from "Leaks" into this new category, in line with the OGMP 2.0 and UNFCCC reporting. Include tonnes of CO_2 equivalent alongside tonnes of methane.*
Annex II, Tables 1–4 and interface with Table 8 – Upstream structure and definitions	*Furthermore, the current regulations do not specify the competent authority responsible for receiving reports from entities carrying out LNG transport between different Member States, whilst Article 12 links reporting obligations to the Member State on whose territory the asset in question is located.*	*Merge Tables 1–4 into an OGMP-aligned upstream table and permit combined reporting for co-located production, gathering and processing.* *Align source names and ordering.* *Provide definitions and schematic examples covering treatment units, compression, field pipelines and gathering systems, including their distinction from transmission and the applicable OGMP terminology.* *Specify that subsea assets with no top-side offshore installations are excluded.*
Annex II, Tables 5-A, 6-A and 7 – Inactive and plugged wells	*Reporting codes, event coverage and the relationship with notifications and other emissions tables are unclear. Re-entering information already held by authorities would duplicate work.*	*Allow irrelevant inactive and plugged wells to be omitted. Clarify Table 7's applicability, responsibilities and measurement requirements. For subsea inactive and temporarily plugged wells reporting should be limited to information about outcome from monitoring surveys, and clarification should be made that shallow-gas seepage is excluded.*
Annex II, Tables 5-B and 6-B – Pressure-monitoring equipment	*Equipment information does not indicate leakage status and adds administrative work.*	*We recommend removing these tables. If retained, make "year of build" optional.*
Annex II Tables 14 and 15 – LNG shipping LNG transport truck or train	*The draft implementing regulation and the reporting templates specify the reporting obligations relating to emissions associated with LNG logistics.* *In our view, a road cistern, a railway carriage or a maritime transport vessel do not constitute an independent 'asset' within the meaning of the Regulation, but are elements used in the operations carried out by other infrastructure assets, such as LNG facilities.* *Furthermore, the current regulations do not specify the competent authority responsible for receiving reports from entities carrying out LNG transport between different Member States, whilst Article 12 links reporting obligations to the Member State on whose territory the asset in question is located.*	*We propose adding a clarification stating that the reporting of emissions related to LNG logistics (in accordance with Tables 14 and 15) does not create a new category of reporting obligation for logistics operators, who do not, at the same time, become separate reporting entities.* *Alternatively, Tables 14 and 15 should be removed.*
Annex II, Table 20 – Venting and flaring	*Reporting codes, event coverage and the relationship with notifications and other emissions tables are unclear. Re-entering information already held by authorities would duplicate work.*	*Explain codes and coverage, including the relationship between Article 16(1) notifications and Article 16(2) reporting. Avoid repeat submission and request no information beyond Annex III. We recommend allowing smaller venting and flaring events (i.e., not meeting the Article 16(1) threshold) to be reported in aggregate on an annual basis.*