OFFSHORE NORGE

To the EU Commission

6th November 2026

Feedback on implementing act on templates for reporting methane emissions in the energy sector

Offshore Norway appreciates the opportunity to provide input to the EU Commission's proposal for implementing act on templates for reporting methane emissions in the energy sector for EU oil, gas and coal operators under the EU methane regulation (Regulation (EU) 2024/1787)[1].

Offshore Norway is the industry organization for operating companies and suppliers on the Norwegian continental shelf, representing over 100 operator, supplier, and distributor companies within the oil and gas sector, as well as other companies with activities related to the Norwegian continental shelf.

Offshore Norge supports the overall goal of the EU methane regulation to reduce methane emissions across all relevant sectors of the economy. Norway's methane emission performance is recognized by IEA[2] and the UN's Secretary-General[3] as being amongst the best in the world. As stated in previous input[4], Offshore Norge does not support the implementation of the EU methane regulation into Norwegian law. Norway already has a well-functioning, risk-based system for reducing methane emissions that is cost-effective and targeted. Implementation of the EU methane regulation into Norwegian law may lead to increased emissions within some areas, more frequent shutdowns for leak repairs and significant increased costs relative to the emission reductions achieved.

The current methane reporting for oil and gas production and processing facilities in Norway is developed in close cooperation between the industry and the authorities and is tailor made for our offshore production and complex onshore gas processing facilities. **Offshore Norge therefore does not support the implementing of the proposed EU reporting templates in Norway, as this will significantly increase the administrative reporting burden without improving data quality or further reducing methane emissions.**

The proposed EU reporting templates do not reflect the configuration and operational conditions of the Norwegian offshore oil and gas production and complex onshore gas processing facilities. In particular, the proposed templates contain unclear reporting boundaries and information requirements that are not relevant to Norwegian offshore activities.

The current Norwegian methane reporting framework[5] reflects similar principles for emission quantification as OGMP2.0 Level 4. As the sources in the Norwegian scheme are more granular

[1] EU commission's consulting webpage
[2] IEA Global Methane Tracker 2026
[3] UNSG Call to action on methane
[4] Input from Offshore Norge to consultation Dec 2024
[5] Guidelines for emission reporting and handbook for quantification

than OGMP2.0, Offshore Norge has established a guidance document[6] that explains how methodologies in the Norwegian scheme can be applied to the OGMP 2.0 source categories.

Operators at the Norwegian continental shelf are now preparing to fulfil the importer requirements in the EU methane regulation by conducting site-level measurement at selected offshore assets with top-side installations. The result from the site-level measurement will be subject to a process of reconciliation with the reported (level 4) data and used to improve quality of the annual quantified emission data for each asset.

For inactive, temporarily plugged and permanently plugged and abandoned offshore wells, Norway has extensive regulations[7] to ensure proper leakage barriers. Inactive and temporarily plugged wells are routinely followed up with pressure monitoring and/or inspections. Permanently plugged wells are inspected as part of the plugging and abandonment procedure to ensure no leak.

Offshore Norge's overall input to this consultation is that the EUs reporting templates should be fully harmonized with the OGMP2.0 reporting templates. OGMP2.0 should also be considered for the EU Commission's upcoming implementing act for the procedure and requirements concerning evidence to be provided by a third country for establishing equivalence. For detailed input to the proposed reporting templates, we refer to the response from IOGP.

Please contact us if you have any questions about our input.

Best regards,

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[6] VOC handbook and OGMP2.0 L4 alignment
[7] Well plugging - Norwegian Offshore Directorate