



**Regulation on methane emissions reduction
in the energy sector and amending
Regulation (EU) 2019/942
COM(2021) 805 ([Link](#))
Position Paper**

**Austrian Federal Economic Chamber (WKO)
EU Transparency Register No 10405322962-08**

September 2023

WKO Position Paper on the EC Proposal for a Regulation on methane emissions reduction in the energy sector and amending Regulation (EU) 2019/942

COM (2021) 805 ([Link](#)), 15.12.2021

General position: In Austria, methane is the second most important greenhouse gas in Austria with a share of 8.4 % in 2021. Methane emissions decreased by 42.6 % between 1990 and 2021. In Austria, 72 % of methane emissions in 2018 were caused by agriculture and 18 % by waste management. The energy supply sector accounted for only 9 % of methane emissions.

In principle, we welcome the fact that the EU wants to create improved framework conditions for the further reduction of methane emissions and thus supports the efforts of the Austrian gas industry.

Energy supply sector: According to the Austrian Greenhouse Gas Inventory, methane emissions from gas extraction, storage and distribution were 0.22 Mt CO₂-eq in 2019. This is only 0.28% of total Austrian greenhouse gas emissions.

Methane emissions are continuously monitored and systematically controlled through leak detection and repair programs. Due to the already small share, there are only very small reduction possibilities. This circumstance should be taken into account insofar as the associated bureaucratic burdens (measurement, testing and reporting obligations, etc.) are kept as low as possible and attention is paid to practicality. In addition, an exception should be made for the import of small or very small quantities, especially in the case of the very complex presentation of supply chains.

Coal mining: In view of the in Austria quantitatively subordinate importance of the abandoned coal mining industry with regard to methane leakage, the related provisions of the draft regulation can be dispensed with completely for Austria without failing to achieve the purpose of the directive. Alternatively, measurements already carried out in the coal industry on the basis of legal obligations to avert danger should suffice in order to avoid a financial burden on the companies that is ineffective in terms of results.

The European Commission suggested a threshold value for old mining sources is 0.5 t p.a., that is 700m³ per year or the methane equivalent of 2-3 cows or 1 per mille of the measurement accuracy (!). This requirement is disproportionate and imposes very expensive permanent measurements on a long-dead mining industry for peanuts of emissions. And the knowledge will hardly be able to lead to consequences in terms of content with justifiable effort. A realistic value of 5 tons as suggested by the Council is supported.

Leak detection and repair: It is essential to consider the technical differences between the infrastructure components, as inspection intervals should be defined on the basis of technical criteria of the type of installation, the pressure stage and the material.

A technology neutral and future-proof approach should be foreseen that encourages operators to use the best-available technology. The limits resp. thresholds should therefore be provided as concentration values (ppm) as well as leakage rates (g/h).

Sensitive information: A very critical issue is the management of and access to very sensitive information about the energy sector, which is the backbone of each member state's energy security. We see no benefit in the proposal to give third parties access to this information. An education and information campaign about methane emissions in all relevant sectors and the need to change our daily habits could be more effective.

Competent authorities: We see the establishment of multiple competent authorities in the member states as imposing a huge administrative burden. Furthermore, it is questionable how the flow of information on emission levels between authorities, operators, auditors, the European Commission and IMEO (International Methane Emissions Observatory) will take place.

Differences between member states: The existing differences between the member states and the companies must be considered. Efforts must be made to identify the major emitters and support them while requiring them to minimize their methane emissions. Companies with experience should share their knowledge with those that have less experience.



Contact:

Juergen Streitner, WKO, Director of Environment and Energy Policy Department, +43 590 900-4195, juergen.streitner@wko.at [mailto:](mailto:juergen.streitner@wko.at)

Barbara Lehmann, WKO Brussels, EU Representation, +32 2 286 58 80, barbara.lehmann@eu.austria.be

Claudia Huebsch, WKO, Environment and Energy Policy Department, +43 590 900-3007, claudia.huebsch@wko.at

