

EEB views submitted following the Stakeholder Meeting (webinar) organised by the European Commission DG ENER on a Strategic Plan to Reduce Methane Emissions in the Energy Sector

1 April 2020

Key facts:

- Methane emissions, regardless of their source, affect both climate and air quality – resulting in ground-level ozone – in the same way;
- There is no dedicated instrument at EU level to reduce overall methane emissions, and a limited sectorial action addressing only energy-related methane emissions will be insufficient;
- In the EU, agriculture and waste together are responsible for more than the 80%¹ of methane emissions, which means that a Strategic Plan which does not consider those two sectors is simply not going to deliver the health, environmental and climate protection needed, i.e. an effective reduction of methane emissions in the EU;
- Total methane emissions in the EU are not decreasing fast enough, and since 2013 total emissions from agriculture are even increasing (in 2017 methane from agriculture accounted for 54% of total EU methane emissions); this is not in line with DG ENER's background paper affirming that *'The European Union has already started to address methane emissions from other sectors such as agriculture and waste, through sector-specific and non-legislative acts since late 90's'*.

Binding legislative acts which require a comprehensive action on methane emissions:

The European Commission already committed to tackle methane emissions through a Declaration included in the National Emission Ceilings Directive: it declared that there is a *"strong air quality case"* and that *"it will consider measures for reducing those emissions, and where appropriate, submit a legislative proposal to that purpose"*. The Governance Regulation article 16 is asking the European Commission to put forward *"a Union strategic plan for methane"*. These laws offer many details on the objectives that reduced methane emissions will contribute to achieve (health, environmental and climate) and also on the horizontal approach to be adopted: all sources should be tackled.

- The National Emission Ceilings Directive 2016/2284/EU (NECD), which was published on 17 December 2016, contains a Commission's Declaration focused on actions on methane emissions; it also refers to studies to be considered, and the one from the Joint Research Centre's was finalised in 2018. The Declaration reads:

¹ European Environment Agency, ['Air quality in Europe – 2019 report'](#), page 24;

“Declaration by the Commission on the Review of Methane Emissions

*The Commission considers that **there is a strong air quality case** for keeping the development of methane emissions in the Member States under review in order to **reduce ozone concentrations in the EU and to promote methane reductions internationally**.*

*The Commission confirms that on the basis of the reported national emissions, **it intends to further assess the impact of methane emissions on achieving the objectives set out in Art. 1 paragraph 2 of the NEC Directive and will consider measures for reducing those emissions, and where appropriate, submit a legislative proposal to that purpose**. In its assessment, the Commission will take into account a number of ongoing studies in this field, due to be finalised in 2017, as well as further international developments in this area”. [The European Commission Joint Research Centre’s dedicated study had been published at the end of 2018].*

Article 1, para 2 of the NECD clearly indicates the links between methane emissions and wider climate and environmental impacts:

“This Directive also contributes to achieving:

- (a)the air quality objectives set out in Union legislation and progress towards the Union's long-term objective of achieving levels of air quality in line with the air quality guidelines published by the World Health Organisation;*
- (b)the Union's biodiversity and ecosystem objectives in line with the 7th Environment Action Programme;*
- (c)enhanced synergies between the Union's air quality policy and other relevant Union policies, in particular climate and energy policies”.*

- Article 16 of the Regulation on the Governance of the Energy Union and Climate Action 2018/1999, published on 21 December 2018, asks the European Commission to put forward a Union Strategic Plan for methane (part of its Long-Term strategy on climate), without it being limited to energy-related methane emissions, nor to ‘mineral methane emissions’; therefore, to properly implement Article 16 of the Governance Regulation, the European Commission should put forward a Strategic Plan on methane as an horizontal instrument tackling methane emissions from all sources.

“Article 16

Strategic plan for methane

*Given the high global warming potential and relatively short atmospheric lifetime of methane, the Commission shall analyse the implications for implementing policies and measures for the purpose of reducing the short- and middle-term impact of methane emissions on Union greenhouse gas emissions. Taking into account the circular economy objectives as appropriate, **the Commission shall consider policy options for rapidly addressing methane emissions and shall put forward a Union strategic plan for methane as an integral part of the Union's long-term strategy referred to in Article 15”**. [Article 15 refers to the Union Long-Term Strategy on climate].*

Action at international level on air quality:

Parties to the UNECE Convention on Long-Range Transboundary Air Pollution (also known as the Air Convention) have recently adopted the priorities for the decade 2020-2030 in their Long-term strategy². The reduction of methane as an ozone precursor (harmful for our health and the environment) is one of them. The ongoing review and expected revision of the Air Convention's Gothenburg Protocol should also support the international community in taking measures to reduce methane emissions in order to achieve air quality objectives.

The European Green Deal:

The European Green Deal published in December 2019 refers to the need to address the issue of energy-related methane emissions. This announcement of limited action in only one source-sector is not coherent with the need to swiftly reduce methane emissions from all sources (overall emissions). When considering:

- 1) the source apportionment (energy, waste and agriculture sectors),
- 2) the increase in agricultural methane emissions,
- 3) the Paris Agreement's objective to limit global warming to maximum 1.5-2 degrees, which the EU has signed up to, and the air quality objectives already enshrined in EU legislation,
- 4) the Governance Regulation request to put forward a comprehensive Strategic Plan on methane,
- 5) the EC's Declaration in the NEC Directive,
- 6) the priorities identified at International level (UNECE and UNFCCC)

it is clear that the efforts of the European Commission should not be limited to action solely on energy-related methane emissions. Instead, all main sources of methane emissions should be tackled. To only address around the 16% of EU methane emissions (from the energy sector) and to continue to ignore the 54% emanating from agriculture will not deliver the needed results and it is not in line with existing pieces of legislation and commitments that require real action to reduce total overall methane emissions.

Feedback on the stakeholders meeting (webinar) which took place on 20 March 2020:

EEB represents more than 160 organisations from the EU and beyond. When participating in the webinar organised on 20 March 2020, we were not given the possibility to express our views as we were not allowed to speak and neither was a very specific written question answered. However, other organisation representatives had the possibility to speak several times and were also invited to do so by the moderator.

We regret that the webinar did not allow EEB to express its views on this very important issue, and we hope that this paper will be considered both when elaborating the report on the stakeholder's view gathered and also when deciding on steps to be taken to reduce methane emissions.

We remain at your disposal in case you have any question and to offer additional information if helpful, as addressing methane emissions and engaging in stakeholder consultations are two key priorities for the EEB.

² [Long-term strategy for the Convention on Long-range Transboundary Air Pollution for 2020–2030 and beyond](#), agreed in December 2018;