EUROPEAN
COMMISSION

Brussels, 20.7.2026
C(2026) 5172 final

COMMISSION RECOMMENDATION

of 20.7.2026

on optional model clauses developed pursuant to Regulation (EU) 2024/1787 of the European Parliament and of the Council of 13 June 2024 on the reduction of methane emissions in the energy sector and amending Regulation (EU) 2019/942

COMMISSION RECOMMENDATION

of 20.7.2026

on optional model clauses developed pursuant to Regulation (EU) 2024/1787 of the European Parliament and of the Council of 13 June 2024 on the reduction of methane emissions in the energy sector and amending Regulation (EU) 2019/942

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 292 thereof,

Whereas:

(1) Article 28(3) of Regulation (EU) 2024/1787 of the European Parliament and of the Council[1] provides that the Commission shall issue recommendations containing optional model clauses related to the information to be provided for the purposes of Article 28(1) and (2) thereof.

(2) Article 28(1) of Regulation (EU) 2024/1787 requires importers to demonstrate and report, from 1 January 2027, that their supply contracts cover only crude oil, natural gas or coal produced under monitoring, reporting and verification measures equivalent to those set out in that Regulation.

(3) Pursuant to Article 28(1) of Regulation (EU) 2024/1787, that obligation applies to contracts concluded or renewed on or after 4 August 2024. As regards contracts concluded before that date, Article 28(2) of Regulation (EU) 2024/1787 states that importers have an obligation to undertake all reasonable efforts to require such equivalence at producer level in their contracts.

(4) The optional model clauses may be used by importers placing crude oil, natural gas and coal on the Union market who are in the process of modifying or renewing existing contracts or signing new contracts for the supply of crude oil, natural gas and coal.

(5) The optional model clauses are intended to promote fair, transparent and sustainable contractual practices, to provide a framework for the adjustment of contractual terms, to support compliance with Regulation (EU) 2024/1787 and to foster reliable supply of crude oil, natural gas, LNG or coal to the Union.

(6) In addition to the obligations concerning equivalence of measures, Article 27(1) of Regulation (EU) 2024/1787 requires importers to report, on an annual basis, methane emissions data and information from countries and companies exporting to the Union, including details on whether, and if so, how they are measuring, reporting and abating their methane emissions.

(7) Moreover, the first subparagraph of Article 29(1) of Regulation (EU) 2024/1787 requires importers to report, by 5 august 2028 and every year thereafter, on the methane intensity of the production of crude oil, natural gas and coal that they place on the Union market, according to a methodology to be set out by the Commission. The obligation set out in the first subparagraph of Article 29(1) of Regulation (EU) 2024/1787 applies to contracts concluded or renewed on or after the entry into force of the Regulation. As regards contracts concluded before that date, importers have an obligation of undertaking all reasonable efforts

---

[1] Regulation (EU) 2024/1787 of 13 June 2024 on the reduction of methane emissions in the energy sector and amending Regulation (EU) 2019/942 (OJ L, 2024/1787, 15.7.2024, ELI: http://data.europa.eu/eli/reg/2024/1787/oj).

to report the methane intensity of the production of crude oil, natural gas and coal placed by them on the Union market.

(8) Article 29(2) of Regulation (EU) 2024/1787 requires importers to demonstrate that the methane intensity of the production of crude oil, natural gas and coal that they place on the Union market is below maximum values to be set by the Commission. As per Article 29(6) of Regulation (EU) 2024/1787, the methane intensity values are to be set by the Commission by way of delegated acts. Before setting intensity values, the Commission is tasked to assess the potential impact of various maximum methane intensity levels on both security of supply and the promotion of methane emission reductions, and to present a report to the European Parliament and to the Council in this regard. The Commission is required to set these values at levels that promote reductions of the global methane emissions in relation to the crude oil, natural gas and coal placed on the Union market, while preserving the security of energy supply at Union and national levels, ensuring a balanced distribution of the volumes of crude oil, natural gas and coal placed on the Union market as well as non-discriminatory treatment, and protecting the competitiveness of the Union's economy.

(9) To demonstrate compliance with the requirements set out in Article 27(1), Article 28(1) and (2), and Article 29(1) and (2) of Regulation (EU) 2024/1787, an importer must provide evidence to the competent authorities of the Member State designated pursuant to Article 4(1) of Regulation (EU) 2024/1787 in which it is established. Regulation (EU) 2024/1787 does not specify any concrete means or requirements for evidence of compliance. In particular, Regulation (EU) 2024/1787 does not require physical tracing of molecules, deliveries or cargoes.

(10) Where an importer has a direct relationship with a producer or can identify the producer through contractual relationships with intermediaries, evidence of compliance as well as any other information concerning, for instance, methane-measurement, reporting and verification can be transmitted by the producer down the supply chain, as part of or together with the contracts and/or the supply of physical energy, to the importer, and, ultimately, by the latter to the competent authorities of the relevant Member State.

(11) Where a direct or indirect relationship between the producer and importer is difficult or impossible to establish due, for instance, to the practice of mixing together different supplies of gas or oil for transport or storage, or because of trading through hubs or exchanges before export, importers can rely on different types of compliance solutions to provide evidence of compliance with the import requirements of Regulation (EU) 2024/1787.

(12) A type of compliance solution that Member State competent authorities, in situations set out in recital (11), can decide demonstrates compliance with the import requirements of Regulation (EU) 2024/1787 is known as 'trace and claim'. This approach tracks the transactions of crude oil, natural gas or coal down the supply chain from the production level to the importer, including through the various exchanges and trading hubs where the energy is bought and sold. In a 'trace and claim' type solution, the information related to the particular quantity of crude oil, natural gas or coal produced which is required from importers to provide evidence of compliance with Regulation (EU) 2024/1787 is either passed down the supply chain by contractual counterparties, or collected by compliance solution providers. That information follows the specific quantities of energy as they are passed down the supply chain together with the commercial transactions from the producer to the importer.

(13) Another type of compliance solution that Member State competent authorities, in situations set out in recital (11), can decide demonstrates compliance with the import requirements of Regulation (EU) 2024/1787 is known as 'certification'. Compliance solution providers issue certificates to producers of crude oil, natural gas or coal that have demonstrated evidence of compliance with the requirements of Regulation (EU) 2024/1787. These certificates, which contain, or are delivered together with, all the information necessary to demonstrate evidence of compliance with Regulation (EU) 2024/1787, can be obtained by importers as an

alternative to providing evidence of either physical or contractual tracking and delivery of equivalent quantities of compliant energy placed on the Union markets.

(14) Compliance solutions should meet certain criteria as a minimum condition for Member State competent authorities to deem them suitable for use by importers to demonstrate compliance with the import requirements of Regulation (EU) 2024/1787 and in order to minimise the risk of fraudulent or multiple issuance or claims.

HAS ADOPTED THIS RECOMMENDATION:

(1) It is recommended that contracting parties use the optional model clauses set out in Section 2 of the Annex to this Recommendation in their contracts for the supply of crude oil, natural gas or coal to be placed on the Union market.

(2) It is recommended that Member State competent authorities promote the use of the model clauses set out in Section 2 of the Annex to this Recommendation.

(3) In cases where a direct or indirect relationship between the producer and the importer is difficult or impossible to establish, Member State competent authorities should recognise providers of compliance solutions known as 'trace and claim' and 'certification' as described in this Recommendation, to be used by obligated parties in order to help demonstrate compliance with the import requirements of Regulation (EU) 2024/1787. In such cases, Member State competent authorities should take due account of the criteria set out in Section 1 of the Annex to this Recommendation when assessing compliance of the information submitted by importers with the requirements of Regulation (EU) 2024/1787.

Done at Brussels, 20.7.2026

For the Commission
Dan JØRGENSEN
Member of the Commission

CERTIFIED COPY
For the Secretary-General

Martine DEPREZ
Director
Decision-making & Collegiality
EUROPEAN COMMISSION