Berlin/Bonn, 06 November 2026

Position Paper

Draft Commission Implementing Regulation on reporting templates for methane emissions reporting

Reporting in accordance with Art. 12 of Regulation (EU) 2024/1787 (Methane Emissions Regulation)

Version: final

Transparency register

BDEW and DVGW are registered in the German as well as in the European transparency register.

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National register entry: R000888.
European register entry: 20457441380-38

DVGW German Technical and Scientific Association for Gas and Water e.V. is registered in the German lobby register for the representation of interests before the German Bundestag and the Federal Government, as well as in the EU transparency register for the representation of interests before the EU institutions.

National register entry: R000916
European register entry: 049954229126-63

Information on the associations BDEW and DVGW

The German Association of Energy and Water Industries (BDEW), Berlin, represents over 1,900 companies. The range of mem-bers stretches from local and communal through regional and up to national and international businesses. It represents around 90 percent of the electricity production, over 60 percent of local and district heating supply, 90 percent of natural gas, over 90 percent of energy grid as well as 80 percent of drinking water extraction as well as around a third of wastewater disposal in Germany.

DVGW German Technical and Scientific Association for Gas and Water e.V. (DVGW) enables specialists and political decision-makers with its long-term expertise based on research results and practical experience. DVGW pools the experience of more than 13,000 members – transmission and distribution system operators, local authorities and other players in the German gas industry – and contributes its 165 years of experience in the gas industry and standardisation. In the EU, DVGW is actively involved in the European Committee for Standardisation (CEN) as well as the associations Marcogaz, Hydrogen Europe and Eurogas.

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Preliminary remarks

BDEW and DVGW welcome the opportunity to comment on the draft reporting templates issued by the European Commission for a consultation from 9 October until 6 November 2026. The present position paper refers to the files issued for this consultation as well as to the current draft version of the "Methane Emissions Database" developed pursuant to Art. 30 of the Methane Emissions Regulation (MER) which was presented, in October 2026, to stakeholders from the industry.

Members of BDEW and DVGW had the opportunity to test the functionalities of a first version of the Methane Transparency Database (MTDB). The present position paper also includes the test users' experiences to help optimise the reporting templates.

1 Executive Summary

BDEW and DVGW especially ask for the following changes to the present draft Implementing Regulation (IR), to the draft reporting templates as well as to the MTDB:

- **Clear and unambiguous reporting channels and adequate reporting deadlines**

  Reporting entities need legal certainty on how they can fulfil their reporting obligations resulting from the MER. If new reporting tools are introduced as alternative reporting channels, it must be ensured that using these tools has the same legal quality as directly reporting to the authorities which are designated as recipients of the reports.

  Reporting deadlines must be aligned between the MER and the new IR.

- **Union-wide reporting database only after thorough reliability testing; maintain existing reporting channels in any case**

  Once it has proven to be reliable and to run smoothly, an EU-wide Methane Transparency Database can become a suitable instrument for centrally organising methane emissions reporting from reporting entities to national or regional authorities and from these to the European Commission. The draft MTDB presented by the European Commission in October 2026 is still far from functioning reliably. Thus, it should not yet be used for MER reporting.

  Once an MTDB is fully developed and has proven itself in practice, it can be used in the way described above. Even then, reporting entities should remain allowed to report directly to the competent authorities. Multiple reports using non-identical reporting standards—for example, to the United Nations Environment Programme (UNEP), the EU, and to national and regional authorities — must be avoided.

- **Critical infrastructure protection**

  The public availability of methane transparency data may conflict with (national) requirements for the protection of critical infrastructure. To mitigate security risks, publication requirements should not relate to precise asset coordinates but be limited to aggregated data. The underlying detailed data should remain available for verification purposes.

- **Attribution of emissions to operators**

  Clarity is needed on who is obliged to report. To avoid double counting of emissions, operators of assets should be obliged to report, not owners without an operational function.

- **Transition rules for verification**

  Due to the lack of accreditation systems and accredited verifiers, adequate transition rules are needed to enable reporting entities to fulfil their reporting requirements.

- **Unambiguous definitions and dimensions**

  The terminology used in the MTDB and in the reporting tables in the Annex to the draft Implementing Regulation (IR) should be adjusted to existing technical standards and guidelines.

2 General remarks

BDEW and DVGW welcome the introduction of clear reporting templates for the different reporting obligations in the MER. Especially positive is the fact that the templates developed so far have been guided by the existing reporting standard OGMP 2.0.

It is also useful to integrate the reporting templates and the Methane Transparency Database (MTDB) which has to be developed by the European Commission in accordance with Art. 30.1 MER. A centralised database and data hub which establishes a clear reporting process across countries helps avoid duplicate reporting. This would be particularly useful in Germany, given the reporting landscape involving 16 state authorities and one federal authority.

Yet, reporting channels have to be clear, and every provision laid down in the new Implementing Regulation has to be in line with the requirements set in the MER.

Before the usage of the MTDB can start and the reporting templates presented in Annex II of the draft IR become mandatory, important prerequisites have to be met. First, the MTDB has to run smoothly, and it must be ensured that data uploaded by reporting entities reach the competent authorities. Moreover, verifiers have to be available who would issue verification statements. This is not the case today.

Against the background of the European Simplification Agenda, notably the “Better Regulation” Initiative and the Communication “A simpler and faster Europe: Communication on implementation and simplification”, the design and implementation of reporting requirements under the MER should aim to ensure an efficient and practicable data reporting framework. Where appropriate, existing data sources, established documentation processes and reporting systems should be taken into account in order to avoid duplication of reporting efforts and to limit additional administrative burden, while maintaining the information necessary to achieve the objectives of the Regulation.

Please find below BDEW’s and DVGW’s detailed remarks on different aspects of the present draft IR.

3 Reporting within the MTDB

The European Commission plans to introduce the MTDB pursuant to Art. 30.1 MER as the main "vehicle" for the reporting required by Art. 12 MER, and most probably also for the reporting under Art. 16.2 and 18.3 MER. In a webinar held during the consultation phase, the Commission explained its plans with regard to Art. 12 MER:

- Reporting entities (e.g. gas grid operators) will be given access to the MTDB and asked to upload data on methane emissions from their assets into the MTDB.
- In a next step, the competent authorities would be given access to the data sets of "their" reporting entities. After assessing the reports and coming to a positive opinion, the competent authorities would make the reports available to the European Commission – also within the MTDB.

The idea is that, by doing so, reporting entities and competent authorities would fulfil the tasks laid down in Art. 12.3 to 12.6 and in Art. 12.8 MER, respectively.

At first glance, integrating the whole reporting channel in the MTDB makes sense. This can help avoid double reporting and harmonise reporting across the EU, facilitating, in a next step, cross-EU data analysis.

Recently, members of BDEW and DVGW had the opportunity to test the functionalities of a first version of the MTDB. The testing of the MTDB was restricted because of the limited availability of the database itself and errors in the connection. The time granted to test did not allow users to test every function exhaustively. Still, all test users reported major errors during the processing and even experienced users had problems uploading data, even users with experience in international or national reporting (e.g. OGMP 2.0, DVGW Gas-Wasser-Statistik "GaWaS").

In addition to these technical issues, we have a number of concerns with regard to the plans to make reporting via the MTDB mandatory. They are described in the following sections.

3.1 Clear and unambiguous reporting channels needed

Reporting entities need legal certainty on which action is needed to fulfil the obligations resulting from the MER. In the case of Art. 12.3 MER, they are obliged to submit their reports by a certain date to the relevant competent authority. Without an integrated MTDB, these reports would be transferred directly from the reporting entity to the respective authority – most probably electronically (e-mail or upload to a platform run by the given authority). If this reporting step is to be organised within the MTDB, it has to be ensured that by making its data

available to the competent authority, the reporting entity fulfils its legal obligations under Art. 12.3 MER. This requires the following:

- All competent authorities within the EU that assume monitoring tasks under the MER have to accept the MTDB as the platform for the data transfer. BDEW and DVGW wonder whether the European Commission can oblige all competent authorities to accept the platform.
- The MTDB has to provide to the reporting entity a confirmation saying that the data were correctly transferred to the competent authority. This has to be taken into consideration in the functions of the MTDB.

Moreover, in Germany, most states have not yet announced a competent authority. Currently, a federal authority (Umweltbundesamt – UBA) serves as a "default addressee" for reports. Once a state authority is nominated, the UBA will lose its "default addressee" role for entities operating in the given state. In such cases, it will be challenging and involve an additional bureaucratic burden to keep the MTDB up to date with regard to the correct addressees.

3.2 Adequate reporting deadlines

It would be necessary to adjust and harmonise the reporting deadlines between the MER and the Implementing Regulation as well as to rethink existing deadlines.

When reporting via the MTDB is introduced, BDEW and DVGW recommend harmonising the reporting deadlines to facilitate accurate and comprehensive reporting. It is proposed to allow the upload of data until 31 May (instead of 5 February) of each year. This extension would provide stakeholders with sufficient time to finalise and verify their submissions, ensuring data quality and compliance with the requirements of the MER.

3.3 Critical infrastructure protection

A key issue that is not adequately addressed throughout the IR is the protection of critical infrastructure. Gas transmission and distribution networks, together with their associated valve stations and gas stations (compressor stations, regulating and metering stations), constitute critical infrastructure and therefore require particular protection. In Germany, such installations are subject to the KRITIS-Dach-Gesetz (the national implementation of Directive (EU) 2022/2557 on the resilience of critical entities and repealing Council Directive 2008/114/EC), which contains requirements governing the handling of critical infrastructure data.

According to Art. 30.2 (d) MER, the "methane transparency database shall serve as an information tool that is to be publicly available free of charge." Compliance with this requirement would result in a breach of the KRITIS-Dach-Gesetz. The confidentiality provisions in Art. 30.6 MER and in Annex I, Section 3, point (xx) of the draft IR do not explicitly address critical infrastructure protection requirements, such as those under the German KRITIS-Dach-Gesetz. We recommend clarifying that critical infrastructure data may be withheld in the same manner as personal data where disclosure would create security risks.

Art. 5.4 MER already recognises that certain information may be withheld for confidentiality reasons. Therefore, we object to reporting precise coordinates (Annex II, Table 00, points (f) and (g) IR). Aggregated reporting would still enable asset-type-specific analyses while protecting critical infrastructure. Compliance can be demonstrated through verification activities without disclosing all underlying data.

3.4 Attribution of emissions to operators and/or asset owners

In today's reporting practice, 100 % of an asset's emissions are attributed to the operator of this asset. The operator reports 100 % of the asset's emissions. Ownership shares are being reported separately. This operator-oriented approach was the basis for OGMP reporting as well as for reporting in accordance with Art. 12 MER for 2024 and 2025.

The draft IR foresees that "equity share" is one item for the identification of the specific site, facility, asset, business/operating unit (SFABOU), see Annex II, Table 00, item (j). As we understand it, this means that the draft IR deviates from the existing operator-oriented approach. In practice, this will bring numerous problems. After in-depth discussions on this issue, the industry and the United Nations Environment Programme (UNEP) concluded that the existing operator-oriented approach is the best-suited option. Therefore, it should also be applied in the new IR, meaning that reporting of any data in relation to non-operated assets should only be done upon request and/or when the relevant data are not already being reported by the relevant operator.

3.5 Alignment with existing national inventory reports

The second sentence of Art. 12.4 MER says that the Commission, when laying down, by means of implementing acts, a reporting template, has to take "into account the national inventory reports [NIRs] already in place and the latest technical guidance documents and reporting templates by OGMP".

BDEW and DVGW doubt whether a central MTDB-based reporting system is in line with the existing NIR practice. Today, national authorities in Germany use the reports received from reporting entities as an important data source for their NIRs. They compile and consolidate the data received before forwarding them to international organisations (EU or United Nations). With a central MTDB-based reporting system, the existing channel of data reporting unnecessarily risks being supplemented with another channel. This would at least represent a doubling of the reporting burden. We therefore suggest that reporting should continue to be made to relevant authorities who may later upload reviewed data/reports into the MTDB. The current issues around the MTDB could also present a risk for the national inventory reports, which should be addressed.

3.6 Publication of sensitive data by competent authorities

Art. 12.8 MER requires competent authorities to make the reports received from reporting entities available not only to the European Commission but also to the public. Since all assets operated along the gas value chain belong to the critical infrastructure, it has to be ensured that sensitive data on these assets are not shared with the public. For example, for distribution grids, the coordinates of pipelines and stations are sensitive data which should not be publicly shared for safety reasons.

As a conclusion from section 3, BDEW and DVGW recommend allowing reporting entities to continue using, alongside reporting via the MTDB, the existing OGMP 2.0 reporting templates. These templates focus on emission volumes by element group, thereby avoiding the disclosure of sensitive data, such as security-related geographic data.

4 Transition rules with regard to verification

Regardless of the method or the way used to report data, reporting entities (e.g. gas grid operators) today face the problem that there are not enough verifiers available who could verify the reports issued to the authorities, as required by the second sentence of Art. 12.3 MER.

There are no national accreditation bodies for verifiers. In Germany, for example, the responsible authority Deutsche Akkreditierungsstelle (DAkkS) announced that the accreditation process cannot be started before mid-2028. Regarding this, uploads are impossible until 2028 for all operators along the whole value chain.

Currently, since reporting entities cannot engage a verifier, they opt for sending non-verified reports to the authorities, explaining the lack of verifiers.

BDEW and DVGW are alarmed that such pragmatic approaches won't be possible in MTDB-based reporting. As presented by the European Commission in the webinar in October 2026, a verifier's confirmation will be a mandatory prerequisite without which a reporting entity would not be able to upload data at all.

If the problem of non-availability of verifiers still persists at the moment when MTDB-based reporting is to become mandatory, the MTDB has to provide for the option to issue reports without a verifier's confirmation. The Implementing Regulation has to comprise suitable transition rules.

5 Shaping an EU-wide Methane Transparency Database (MTDB)

In general, BDEW and DVGW welcome the introduction of a centralised database and data hub. This should establish a clear reporting process across countries while avoiding duplicate reporting. This would be particularly helpful in Germany, given the reporting landscape involving 16 state authorities and one federal authority.

However, before a centralised database and data hub can operate, some important requirements must be met.

5.1 User-friendliness of the MTDB

When shaping the MTDB, it is most important to keep user-friendliness and a clear structure in focus. The range of operators required to report is very heterogeneous, and especially smaller operators may not have sufficient expertise to complete tasks if the requirements and processes are not self-explanatory. In this context, the following points are important:

- Provide clear guidance within the database, including what information must be entered where and clear explanations of errors.
- Improve usability. For example, once assets have been created, they should automatically be included in the relevant templates. Different assets within the same category should also be clearly distinguishable.

- Consider making only the necessary information mandatory initially. As the system develops, for example through improved verification possibilities, additional information could gradually become mandatory.

5.2 Addition of a machine-readable interface

We support the objective of harmonised reporting templates. However, relying on a spreadsheet template as the sole submission channel is not fit for purpose at the data volumes involved.

Spreadsheet-based reporting requires extensive manual copy-and-paste between operators' source systems (GIS, asset management, LDAR and measurement databases) and the template. This is inherently error-prone and hard to audit, and the resulting data quality defects are structural rather than incidental. They will degrade the reliability of the aggregated Union-level dataset.

We therefore ask the Commission to provide, in addition to the spreadsheet template, a documented REST API with a published machine-readable schema, server-side validation and a versioning policy. For most systems in use at European network operators, such an interface is comparatively straightforward to implement.

The API specification, schema and a publicly accessible test environment should be made available well in advance of the first reporting deadline, so that operators can implement and validate their interfaces in time.

6 Detailed Remarks on the draft Implementing Regulation

The following table summarises the points mentioned above as well as comments on further aspects with regard to the present draft IR and its Annex:

Article/ passage	Topic	Remarks and recommendations
Subtitle of the draft IR	Scope of the IR	The subtitle of the draft IR refers to reporting in accordance with Art. 12 MER. Yet, the tables presented in the Annex cover Art. 12 and Art. 16 MER. Article 1 "subject matter" of the draft IR states that the Regulation addresses even three provisions of the MER: reporting under Art. 12 as well as under Art. 16.2 and Art. 18.3 MER. The different documents and passages have to be aligned with regard to the scope of application.
Recital (3)	Inconsistent reporting deadline for non-operated assets	Recital (3) states that the reporting deadline for non-operated assets is 5 August 2028, whereas Article 12.3 of Regulation (EU) 2024/1787 (German version) specifies 5 February 2028. This discrepancy should be clarified.
Recital (8), Annex II	Reconciliation requirements	Further clarification is needed on the criteria for determining statistically significant discrepancies between source-level and site-level emissions, as neither Regulation (EU) 2024/1787 nor the draft Implementing Regulation specifies how statistical significance should be assessed. The reporting templates ("SFABOU" worksheet) indicate whether reconciliation has been carried out. It remains unclear how and where the results of the reconciliation process, including potential adjustments, should be documented and communicated to the competent authority, and how these adjustments should be reflected in the annual emissions report.

Art. 2 IR, definition (2)	Definition "reporting entity identification code"	We would appreciate clarification on whether the authorities are required to set new "reporting entity identification codes" or are able to use existing IDs or codes as well.
Art. 2 IR, definition (3)	Definition "activity factor"	The "activity factor" definition lists several examples (like "number of valves"), but it seems incorrect that "the number of emitting events such as number of operating vents, multiplied, where relevant, by the duration of the emission" is to be used "in combination with emission factor." We would like to get clarity on the intended effect of this definition and its practical application. The MTDB provides only a restricted variety of the applicable dimensions of an "activity factor" (e.g. km).
Annex I, section 2, point (c) and Annex II, Table 00, item (a)	SFABOU ID	It remains unclear as to who would be setting these SFABOU IDs and whether existing reporting identifiers for sites can continue to be used or not.
Annex II, Table 00, item (a)	"SFABOU"	Point (a) of Table 00 in Annex II IR is ambiguous. Clarification is needed on whether SFABOUs should be defined at individual asset level or may be assigned to asset groups. Requiring a separate SFABOU for each asset would create a disproportionate administrative burden for gas transmission and distribution operators. We therefore favour assigning a single SFABOU to each asset type, with further grouping where appropriate. Examples: SFABOU ID for compressor stations SFABOU ID for gas stations SFABOU ID for main lines

		SFABOU ID for service lines
Annex II, Table 00, item (j)	"equity share"	• The rationale for including *equity share* for every "site, facility, asset and business/operating unit" is unclear and would significantly increase the reporting burden. • Art. 12 MER requires operators to report methane emissions associated with the relevant assets. In practice, emissions are measured or quantified at the asset level and are reported as such. Operators do not report a proportional share of emissions based on ownership interests (see also above in chapter 3.2). • In this context, we would like to note that in the German upstream sector information listed in the reporting items in Art. 12.4 (e) MER "share of ownership and methane emissions from non-operated assets multiplied by the share of ownership" and (f) "a list of the entities with operational control of the non-operated assets" would lead to large-scale double reporting as many assets have multiple owners. This information may also represent confidential information. • The inclusion of an "equity-share" field would therefore not only add to the reporting burden but also create ambiguity regarding reporting obligations and may result in double reporting with the risk of inconsistency across various operators without a clear improvement in emissions reporting. • Therefore, we would suggest adding the following clarification: "For self-operated operational units, total emissions of assets are to be reported. Where emissions from non-operated assets are already reported according to these rules, information about ownership shares and pro-rata emissions from non-operated assets is only to be reported upon request by the competent authority to avoid double-counting of emissions."
Annex II, Table 00, item (k)	"verification statement"	The requirement to provide a verification statement presents a practical implementation challenge. To date, accredited verifiers are not yet available across Member States, and operators have not received sufficient guidance regarding the applicable verification process (see chapter 4).

		Also, in some Member States/jurisdictions competent authorities have not yet been formally designated and their roles communicated. We therefore recommend either: • postponing the mandatory submission of verification statements until a functioning accreditation and verification framework is in place; or • providing transitional provisions for operators until accredited verifiers and competent authorities are formally established and operational.
Annex II, all tables, new column	"CO_2 equivalent"	There should be a column inserted to provide the CO_2 equivalent of the methane emission.
Annex II, all tables	Column "Uncertainty"	A definition is needed for a harmonised approach to assessing and reporting uncertainty. Common requirements should support comparable uncertainty information from operators and measurement-service suppliers. References to relevant guidelines such as relevant CEN and OGMP 2.0 guidance are recommended.
Annex II, all tables	Column "Quantification method"	A definition is needed for a harmonised approach to assessing and reporting. Guidance is needed on the common requirements. References to relevant guidelines such as relevant CEN and OGMP 2.0 guidance are recommended.
Annex II, all tables	Column "Emission factor (EF)**"	The unit of the emission factor (EF) is not explicitly specified. Although it can generally be derived from the activity factor (AF) unit and the reporting unit of t CH_4, explicitly stating the EF unit would improve transparency and facilitate the correct interpretation and application of emission factors.

Annex II, all tables	Column "Emission amount (t CH_4)"	Methane emissions from individual emission sources can be very small. Reporting exclusively in tonnes of CH_4 may result in these values being displayed as zero due to rounding, even though actual emissions are greater than zero. It is therefore recommended to establish clear requirements for numerical precision, including the number of decimal places and the handling of rounding.
Annex II, Tables 1-4 (Upstream Activities)	• Table 1 - Upstream - Oil and Fossil Gas Exploration • Table 2 - Upstream - Oil and Fossil Gas Production • Table 3 - Upstream - Fossil Gas Gathering • Table 4 - Upstream - Fossil Gas Processing	The boundaries between these activity categories 1-4 are not sufficiently defined and could lead to inconsistent interpretation and/or double reporting among operators. For example, many upstream operations comprise an integrated value chain in which hydrocarbons are extracted, separated, treated, compressed and transported to other facilities for further processing. In such cases, it is not clear: • where the distinction between "exploration", "production", "gathering", and "processing" should be drawn; • whether on-site treatment and compression activities associated with production should be reported under production, gathering, or processing; • how field pipelines and compressor stations should be classified; • whether certain pipelines and compression facilities in the "upstream" part of the chain should instead be reported under **Table 8 - Midstream - Natural Gas Transmission - Pipelines**. To ensure consistent implementation across Member States and operators, we recommend combining Tables 1-4 into one table only and clarifying that undertakings that do not operate assets across all four categories would still have to report the aggregate data for the categories operated by them. Such an

		adjustment would significantly improve reporting consistency, reduce the risk of double counting or mis-classification.
Annex II, Table 16 – mid-stream – under-ground gas stor-age		Names and definitions should be in line with the MER and technical wording. M-2.1-T4: better use “storage site” as an alternative to a “compressor station” M-2.1-1: For UGS, the term “leaks” should be replaced with “volatile emissions” M-2.1-1-b: “Incomplete combustion (non-flaring)” is a separate item; it does not fit under “leaks” M-2.1-3-a: “Unlit flares” is not necessary, since emissions must be reported under M-2.1-3-b and are al-ready covered there. M-2.2-1: For UGS, the term “leaks” should be replaced with “volatile emissions” M-2.2-1-b: “Incomplete combustion (non-flaring)” is a separate item; it does not fit under “leaks” M-2.2-3-a: “Unlit flares” is not necessary, since emissions must be reported under M-2.1-3-b and are al-ready covered there. M-2.2-4: The term “leaks” should be replaced with “volatile emissions”
Annex II, Tables 17 and 18 – distribu-tion – grids	• Table 17 distri-bution – grids	D-4.1-1-b Incomplete combustion, non-flaring: “Incomplete combustion, non-flaring” does not belong to main lines as gas preheaters are considered to be a part of the gas installation and not part of the pipeline system. D-4.2-1-a-3 Odor Call Warnings: This item is not relevant, since in practice, confirmed gas odour reports trig-ger a fault report that is recorded under operational emissions (e.g. leaks) or, if applicable, third-party dam-age. This line should be deleted. D-4.2-2-c Change/Removal installation of Gas meters: For distribution system operator (DSO) reporting, par-ticularly in relation to meter installation, replacement and removal, the templates should make clear that only activities falling within the scope of Art. 1.2 (c) MER are reportable.

		The scope note should reproduce the exclusions in Art. 1.2 (c) MER precisely, including metering systems at final consumption points and the excluded parts of service lines on final customers' property. D-4.3-T4 Other Stations: It is unclear what kind of gas facilities are relevant. It has to be clarified if this also includes process gas chromatographs. There is a reference (****) missing. Besides, it is unclear where distribution grid operators should report emissions from analytical equipment. Should these emissions be reported under point D-4.5-2-b-2 in Table 18 of Annex II to the IR? D-4-T5 Total Emissions – Site Level: "Site Level" in general is not applicable for a system of pipelines; see also OGMP TGD. It is not clear how this value is derived. Especially for a distribution grid, the coordinates are sensitive data which should not be shared with the public for safety reasons (see also above Chapter 3.3).
	• Table 18 distribution – compressor stations	D-4.5-T5: Total emissions – site level. "Site level" in this context is unclear.
Annex II, Table 20 – upstream – midstream – distribution	•	There should be a limitation on the requirement to report venting and flaring events. It is recommended that this limitation apply to the events specified in Art. 16.1 MER. Venting events are already reported under points D-4.1-2-a, D-4.1-2-b, D-4.2-2-a, D-4.2-2-b, D-4.3-2-a, D-4.3-2-b, D-4.5-2-a and D-4.5-2-d (Tables 17 and 18). Table 20 should therefore not require additional reporting of vents, as this would result in duplicate reporting. To meet the requirements of Art. 16 MER, only flaring events should be reported additionally under Table 20.
Annex II, different tables	Venting activities, Flaring activities	Significant events should be reported separately. Yet, for smaller events, it should be allowed to report them in an aggregated way.

General	Confidentiality of data	The templates do not seem to cater for the confidentiality of information which operators may be allowed to withhold as per Art. 12.7 MER.
Different tables	Relation between “leaks”, “fugitive emissions” and “incomplete combustion”	“Fugitive emissions” and “incomplete combustion” should be listed as separate issues and not as sub-categories of “leaks”. This approach contradicts scientific and technical terminology. They are not leaks, as stated in the relevant documents (technical guidance documents) by OGMP and Marcogaz and as envisaged in future CEN standards.

Contact BDEW

Benjamin Düvel

European Grid Issues

+ 49 30 300199 1112

benjamin.duevel@bdew.de

Lukas Karl

EU Energy Policy

+32 2774 5116

lukas.karl@bdew.de

Contact DVGW

David A. Merbecks

Environment and Sustainability

+49 228 9188-717

david.merbecks@dvgw.de

Frank Dietzsch

Leiter Ordnungsrahmen Gas

+49 228 9188-914

frank.dietzsch@dvgw.de