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## Stellungnahme / Response

# EU methane strategy

### Management Summary

Der Bundesverband der Energie- und Wasserwirtschaft (BDEW), Berlin, und seine Landesorganisationen vertreten über 1.900 Unternehmen. Das Spektrum der Mitglieder reicht von lokalen und kommunalen über regionale bis hin zu über-regionalen Unternehmen. Sie repräsentieren rund 90 Prozent des Strom- und gut 60 Prozent des Nah- und Fernwärme- absatzes, 90 Prozent des Erdgasabsatzes, über 90 Prozent der Energienetze sowie 80 Prozent der Trinkwasser-Förderung und rund ein Drittel der Abwasser-Entsorgung in Deutschland.

## Management Summary

BDEW and DVGW support the European Commission's goal to further reduce anthropogenic methane emissions. The Methane Strategy is a solid basis to achieve this goal.

- **The gas sector will reduce methane emissions even further; but efforts must be made by all sectors.**
  - › There is consensus that methane emissions must be further reduced. Four fifths of all anthropogenic methane emissions in the EU can be attributed to the agriculture and waste sectors, while emissions from the oil and gas industry amount to around six percent (source: UNFCCC). But the gas sector is also taking its share of responsibility.
  - › Companies in the gas sector have successfully invested in measures to reduce emissions for many years. In Germany, methane emissions have already been reduced by 40 percent between 1990 and 2017. Gas infrastructure operators and producers are already working on specific projects that will help to reduce emissions even further.
  - › To meet the climate targets, it is essential that all sectors make contributions in accordance with their share of methane emissions. This requires a continuous improvement of measures to detect and reduce methane emissions.
- **Further improving Metering, Reporting and Verification (MRV) and Leak Detection and Repair (LDAR) measures**
  - › The gas sector is committed to detect and repair gas leaks as quickly as possible. Having solid information on the source and quantity of methane emissions is a basic requirement for defining effective measures to reduce these emissions. Therefore, BDEW and DVGW support the European Commission's plans to improve the existing database across the EU.
  - › Plans to further reduce gas leaks are welcomed. They must build on previous measures taken by the gas industry that already led to a significant reduction of leaks in Germany. These measures include replacing old pipelines with modern materials, inspecting routes (by foot), as well as monitoring, maintaining, and repairing gas pipes and systems. On the TSO level, mobile compressors and mobile flares can often replace gas purging and the use of pneumatic valves. This also leads to a considerable reduction of methane emissions.
  - › The Commission recognises that voluntary and private sector initiatives are important tools to rapidly make progress on measuring, reporting, and reducing methane emission across all sectors. It is appreciated that the Commission wants to make these initiatives the basis for the upcoming legislative process.
  - › While reducing venting and flaring can be generally supported, technical feasibility and cost efficiency must be considered as well. As recognised by the Commission, both

measures must continue to be allowed for the purpose of maintaining technical safety or security of supply.

- › It is welcomed that the Commission calls on National Regulatory Authorities to recognise LDAR-related investments as allowed costs for regulated entities.

- **Having an international impact beyond the EU**

- › It is welcomed that the EU wants to use diplomatic channels and support voluntary initiatives to advocate for a global reduction of methane emissions. Methane emissions from the oil and gas industry only amount to 0.6 percent of European GHG emissions (source: UNFCCC). This demonstrates that European efforts alone are insufficient in addressing this global challenge. Therefore, the EU has a pioneering role.
- › Many gas companies around the world have already significantly reduced methane emissions by taking measures to detect and repair leaks. They are active in joint projects such as the “Methane Guiding Principles” (MGP) initiative or the “Oil & Gas Methane Partnership” (OGMP). These initiatives have an impact beyond the EU.

- **Producing biogas reduces methane emissions from agriculture**

- › It is appreciated that the European Commission supports biogas production from waste materials to reduce methane emissions from the agriculture sector. However, a sustainable soil management must be guaranteed to avoid further nitrate and phosphate pollution.
- › It is vital to upgrade biogas to biomethane and feed it to the overall market. This will lead to more flexibility and has the greatest benefit for the decarbonisation of the gas industry.

- **Measures to reduce methane emissions from wastewater**

- › With respect to methane emissions from wastewater, the data situation must be improved first. It is welcomed that the Commission intends to do more research on this topic to get a clear picture of the situation in Europe. BDEW and DVGW believe that any further measures to reduce methane emissions in the wastewater sector must be based on the results of these studies. Emission reductions that have already been achieved must be carefully considered when making any new regulations.
- › The profitability of sewage gas production and its subsequent conversion into electricity should not be limited by tight regulations, as it is an essential part of the wastewater treatment process.

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