BVEG statement on the methane reporting templates

6 November 2026

A General statement

BVEG welcomes the European Commission's efforts to develop harmonised templates for reporting on methane emissions. Standardised reporting templates that are compatible with OGMP 2.0 can facilitate reporting, improve the comparability of reported information across Member States and create a reliable data basis for the further reduction of methane emissions. To ensure that these benefits are realised in practice, the templates should be based on tried-and-tested reporting procedures and take into account the operational realities of European oil and gas production and underground gas storage. Clear guidelines and the use of existing data can help to limit the administrative burden and ensure that resources remain available for concrete emission reduction measures.

To ensure a clear, proportionate and practical reporting framework, BVEG recommends taking the following five key points into account:

1. **Keep reporting requirements proportionate and within the Regulation's scope**
   Reporting fields should reflect the relevant activities and statutory obligations, without introducing additional measurement requirements. Irrelevant fields and well categories should be removed or identified through standardised notation keys. The conditional exemption from entering activity and emission factors should be expressly included in the main text.
2. **Ensure one submission and make full use of existing data**
   A single submission to the competent authority should avoid parallel reporting. OGMP-compatible bulk imports, published field mappings and validation rules, and the reuse of event reports should minimise manual data entry. Multiple authorised users and service providers should be supported, and CO_2 equivalents should be calculated automatically using a documented AR6 factor.
3. **Clarify reporting boundaries and ensure consistent reporting and verification**
   Clear SFABOU boundaries, consistent identifiers and coordinate references should support reporting, particularly for underground gas storage and integrated upstream activities. Operated and non-operated units should be distinguished to avoid double counting. Purely formal corrections should not require complete re-verification. Incorrect dates, legal references and table titles should be corrected. Site-level results below the detection limit should be reported as such, without trigger or require further reconciliation. The SFABOU level should follow OGMP 2.0, including at business/operating unit level.
4. **Establish a clear procedure for protecting confidential information**
   The reporting system should allow operators to identify withheld information and explain the reasons in accordance with Article 12(7). Confidentiality markings should be checked before publication and preserved during data transfer to prevent the disclosure of protected company information.
5. **Allow sufficient preparation time and provide a clear transition**
   Mandatory use of the new templates should begin no earlier than the 2027 reporting year and at least six months after complete technical specifications and a test environment become available. Until then, timely submissions using existing OGMP 2.0 templates should remain possible.

B Detailed proposed amendments

No.	Reference	Problem or ambiguity	Proposed wording
1	Recital 3	An incorrect date has been included here. For business units not operated by the company itself, 5 August 2028 is stated. According to the Regulation, the date is 5 February.	Replace ‘5 August 2028’ with ‘5 February 2028’.
2	Article 2, introductory paragraph; Annex II, Table 6-B, title	Incorrect Regulation number 2024/2787; incomplete title for temporarily plugged wells.	Replace ‘2024/2787’ with ‘2024/1787’; title: Replace ‘Temporarily plugged’ with ‘temporarily plugged wells’.
3	Article 3 1.-2. ; Annex II, footnote ** of the emissions tables	Footnote ** allows for a conditional exemption from AF/EF cells and is therefore already part of the draft. However, to avoid unnecessary data entry, this exemption should be expressly stipulated in the main text of the article.	“Provided the conditions set out in footnote ** of Annex II are met, the entry of activity and emission factors in the tables may be omitted. The statutory rights of public authorities to information remain unaffected.”
4	Art. 3 2.-3.; Annex I, No. 1 and No. 3, points (vii)–(viii)	The draft does not expressly rule out the parallel submission of the same data via national and European systems. To avoid duplicate entries and conflicting versions of reports, a single submission process to the competent authority, followed by onward transmission by that authority, must be ensured.	“A single submission to the competent authority via the designated reporting channel fulfils the reporting obligation set out in this Regulation. The same data must not be entered again in a parallel format.”
5	Art. 4; Art. 3; Annex I No. 3(i), (iii), (vi), (ix)	Reporting and verification require planning certainty. Entry into force without a specified implementation date leaves insufficient time for data and IT migration. Mandatory use of the templates should therefore apply from the 2027 reporting year at the earliest. The technical specifications and a test environment should be made available at least six months in advance.	“The mandatory use of the new templates shall commence no earlier than for the 2027 reporting year and not before the expiry of six months following the provision of the complete technical specifications and test environment. Until then, submissions to the competent authority must be made on time using the existing OGMP 2.0 templates.”
6	Art. 3(4); Annex I No. 3, points xix–xx; Table 00, letter j	Whilst the confidentiality of certain data is mentioned in abstract terms, no procedure for flagging and separate publication has been laid down. This creates a risk of the disclosure of protected corporate information.	“The system allows for the specification of the nature of withheld information and the reasons therefor in accordance with Article 12(7). Confidentiality markings are checked prior to each publication and preserved during data transfer.”
7	Annex I, No. 1, last paragraph; No. 3, point xiv	Where correction requests under Annex I, No. 1, last paragraph, lead to adjustments to reports, it must be ensured that formal changes which do not affect emission values or audit results do not result in recertification.	“Purely formal corrections that do not affect the verified emissions data or their assessment do not require a complete re-verification. Substantive changes shall be assessed in accordance with their impact; the authority shall set an appropriate deadline.”
8	Annex I, No. 2(c), last sentence	An unspecified requirement regarding the number and frequency of on-site measurements may give rise to additional measurement obligations that are not justified. To avoid legal uncertainty regarding the scope and costs of the measurements, the last sentence should be deleted.	Delete the last sentence of No. 2(c). Addition: ‘The document sets out the measurement programme applied and does not give rise to any further measurement obligations.’

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9	Annex I, No. 2(e); No. 3(iii), (v), (vi), (ix), (xvi)	General OGMP compatibility does not replace automated data mapping; to avoid manual re-entry, provision should be made for OGMP import or Excel/XML bulk import, data mapping, published field catalogues, units and validation rules.	"The reporting system enables structured bulk import and the reuse of existing OGMP 2.0 data. The mapping of data fields and all validation rules are published in advance; only missing information required by law needs to be added." For the column 'Quantification method', a predefined list aligned with OGMP 2.0 is provided, including direct measurement, engineering calculations, modelling and emission factors.
10	Annex I No. 3, points (i)–(ii)	To enable the reports to be prepared through a division of labour and to avoid access bottlenecks, the role management system should explicitly provide for multiple users, including commissioned service providers.	"For each entity subject to reporting requirements, multiple users as well as authorised service providers with tiered access rights may be set up."
11	Annex II, Table 00, point (a); Annex I, No. 2, point (c) and Article 2, definition 2)	The allocation and continuation of the SFABOU-ID remain unresolved. To avoid renumbering and gaps in historical data series, the relevant responsibilities and regulations must be defined. Same issue may apply depending on how "reporting entity identification codes" are being set	"Existing unique site or facility identifiers may continue to be used as SFABOU-IDs and existing IDs for operators may be used as "reporting entity identification codes". The competent authority, format and procedures for changes shall be defined in a standardised manner."
12	Annex II, Table 00, points (f)–(g)	For identification purposes, the draft provides for the specification of latitude and longitude. For spatially extensive or clustered units, the coordinate reference is unclear. To avoid unnecessary repetition, a designated reference point per reporting unit should be permitted.	"The coordinates denote a reference point of the reporting unit. In the case of spatially distributed sources, their assignment is documented in the description or in a linked dataset."
13	Annex II, Table 00, points (h)–(j); Article 12(4), points (d)–(f) of the Basic Regulation as a frame of reference	The information requested in the point (j) 'Equity Share' does not allow to distinguish between units operated by the reporting entity and those not operated by it; there is a significant risk of double counting and confidentiality breaches.	Add clarification that "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 are only to be reported upon request by the competent authority to avoid double-counting of emissions."
14	Annex II, Tables 1–4,	It is not clear why a distinction is made in the templates between the categories 'oil and gas exploration', 'production', 'gathering' and 'processing'. This creates significant confusion on the boundaries between these categories with risks of inconsistent reporting and additional implementation costs without any corresponding added value being apparent.	Combine Tables 1–4 into one table only and clarify 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.
15	Annex II Emissions tables, in particular Tables 1–6-A; Annex I No. 3(vi)	Cells that are left blank because they are irrelevant may lead to errors in the evaluation of the data or be mistakenly interpreted as having been filled in incorrectly. A notation key with a standardised legend and validation must therefore be provided for all fields.	'NO = source not available; NA = not applicable; NE = not estimated, with justification; IE = included elsewhere, with reference.'

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16	Annex II, Tables 5-A and 6-A, pp. 9 and 11	Active production categories such as glycol drying, compressors, fracturing or loading were applied across the board to inactive/temporarily plugged wells and should be removed from the relevant Tables 5-A and 6-A if irrelevant.	Tailor Tables 5-A and 6-A to relevant well sources and permit optional additional categories as well as notation keys in accordance with No. 15.
17	Annex II, emissions tables, rows U-x-1-b	“Incomplete combustion, non-flaring” is listed under “Leaks”. Methane slip from combustion equipment is inherent to the combustion process and is not a leak. Classifying it as a leak is inconsistent with OGMP 2.0, distorts leak indicators and could be read as triggering leak detection and repair obligations under Article 14, which cannot technically apply to combustion slip.	Move “Incomplete combustion, non-flaring” to a separate category “Incomplete combustion” in line with OGMP 2.0. Clarify that it is not a leak within the meaning of Article 14.
18	Annex II, Tables 5-A and 6-A, rows U-5-T5 and U-6-T5	The templates relating to Article 18(3) require a standalone site-wide total value without specifying its concrete basis. T5, as a mandatory field, should therefore be removed for boreholes subject to reporting obligations solely under Article 18(3); separate relevant obligations under Article 12 remain unaffected.	“The T5 rows do not have to be completed for reports based exclusively on Article 18(3). Requirements arising from any independently existing reporting obligation remain unaffected.”
19	Annex II, emissions tables, rows U-x-T5; Table 00, point (m); Annex I, No. 2(c)	For low-emitting sites, site-level measurements frequently return results below the detection limit of the method used. The templates provide no way to report this. Entering “0” or the detection limit itself would misrepresent the result. Table 00 (m) presupposes a reconciliation even where there is no measurable site-level value to compare against.	Where the site-level measurement result is below the detection limit of the method applied, this is indicated in the T5 row together with the detection limit (kg CH_4/h) and the method. If the source-level total (T4) is also below that detection limit, the reconciliation under Table 00, point (m), is deemed to be completed. In all other cases: Whether a discrepancy between site-level and source-level results is statistically significant is assessed in accordance with the OGMP 2.0 reconciliation guidance, taking into account the combined uncertainty of both results.
20	Article 1; Recital 6; Annex I, No. 1(b); Annex II, Table 7, p. 13	According to its title, Table 7 relates to permanently plugged and abandoned boreholes, whilst the annual report referred to in Article 18(3) (inactive/temporarily plugged boreholes) does not include this group of boreholes. Table 7 should therefore be deleted from this set of annual reporting templates.	Delete Table 7; in Annex I, No. 1, point (b), replace ‘Tables 5–7’ with ‘Tables 5–6’.
21	Annex II, Tables 5-B and 6-B, pp. 10 and 12	The year of manufacture of older equipment is sometimes difficult to determine and provides no additional information in relation to methane emissions; the equipment designations under the quantification method are provided to describe installations or parts of installations.	Rename the corresponding columns ‘Year of manufacture, where known’ and ‘Quantification method’ to ‘Measurement principle or instrument technology’.

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22	Annex I No. 2(c); Annex II Table 16	The 'SFABOU' reporting level should be clearly defined. For UGS, it must be clear how storage sites, compressor stations, gas processing facilities and well sites are distinguished from one another or grouped together.	The classification system should be aligned with OGMP 2.0 and avoid double counting. In line with the definition of SFABOU in Annex I, No. 2(c), the reporting entity may set the SFABOU at site, facility, asset or business/operating unit level, consistent with its OGMP 2.0 reporting. This also applies to integrated upstream installations and fields comprising several well sites.
23	Annex II, Table 20, p. 34; Annex I, No. 3, points (v) and (ix); Article 16(1)–(2) as a frame of reference	As interim event reports and the annual report required under Article 16 largely call for the same data sets, provision should be made for the annual report to be pre-populated using the data from the event reports. In this way, only additions or corrections need to be entered anew, thereby avoiding the need for manual re-entry and the associated risk of errors.	"Event data already submitted is reused in the annual report and linked to it. The reporting entity confirms that the data is complete and supplements or corrects it where necessary."
24	Annex II Emissions Tables, 'Emissions Volume' column; Art. 12(4)(b) as a reference framework	Templates show t CH_4, but do not explicitly present the CO_2 equivalents required by law. CO_2e should be calculated and displayed automatically using a uniformly documented, legally valid AR6 factor.	"The system automatically calculates and documents the corresponding tonnes of CO_2 equivalent from the methane quantities. The factor, time horizon and version of the calculation basis are reported."
25	Annex II, emissions tables, column "Uncertainty"	The unit, confidence level and method for uncertainty are not specified. This leads to inconsistent entries and diverging verifier requirements.	Uncertainty is stated as a percentage at a 95% confidence level and determined in accordance with the OGMP 2.0 technical guidance. For factor-based sources, the uncertainty ranges of the emission factors used may be applied.