

Rue de la Loi / Wetstraat 200

1049 Brussels

Belgium

28 May 2025

Dear Commissioner Jørgensen,

We, the undersigned organisations, welcome the European Commission's continued commitment to science- and evidence-based policymaking, reiterated in the recent statements from President von der Leyen and Commissioner Hoekstra, and which we see as a cornerstone of credible and effective policy frameworks.

In this context, we are writing to express our concerns regarding several technical provisions in the latest draft of the Low-Carbon Hydrogen Delegated Act, in particular those relating to methane emissions accounting. We are deeply concerned that this pathway risks undermining the EU's 2030 and 2050 climate targets. Instead of accelerating the energy transition, it could lock Europe into continued fossil fuel dependence.

We respectfully call on the Commission to consider the following revisions:

### **1. Revise the proposed methane default value**

We urge the Commission to increase the methane default value presented in the annex of the draft Delegated Act. Even with the application of a 40% penalty, the current value of 6.6 g CO<sub>2</sub> eq/MJ remains too low and fails to reflect actual average upstream emissions. This figure should be at least doubled to better align with real-world data and to prevent producers with high levels of fugitive methane emissions from unjustly benefiting from default values.

Notably, the current value with the 40% increase corresponds to a methane leakage rate of only 2.3%<sup>i</sup>, which is considerably lower than the 3.2% global average reported by the IEA's Methane Tracker<sup>ii</sup> and well below rates as high as 7.8% observed in certain U.S. basins based on direct measurements<sup>iii</sup>.

### **2. Update the GWP factor for methane**

The Delegated Act still relies on the outdated GWP100 factor of 25, significantly underestimating the impact of methane emissions. We urge the Commission to align the Delegated Act with the latest scientific standards by adopting the updated GWP100 value of 29.8, as recommended by the IPCC and already referenced in the EU Methane Regulation. Based on this updated factor and average global methane leakage rates, the default methane emissions value should be set at a minimum of 16.4 gCO<sub>2</sub> eq/MJ.

Furthermore, we recommend that the Delegated Act acknowledge the relevance of GWP20 when assessing methane emissions associated with low-carbon fuel production, in order to ensure consistency with the EU Methane Regulation, which refers to both GWP100 and GWP20.

**3. Use best-available independent methane emissions data**



Where methane intensity for fossil-based feedstocks cannot be calculated based on operator reporting under Regulation (EU) 2024/1787 due to data gaps, the Commission should require the use of best-available independent sources, such as the IMEO Methane Supply Index<sup>iv</sup>, to determine region-specific default values.





We thank you for your attention and remain committed to working constructively with the European Commission to ensure that EU climate policy is fully aligned with the best available scientific evidence.

Yours sincerely,

*The undersigned*

**The signatories**

Name	Position	Organisation
Helen Spence-Jackson	Executive Director, Europe	
William Todts	Executive Director	

Justin Wilkes	Executive Director	
Guillermo Ramo	Energy Systems Policy Manager	
Sascha Müller-Kraenner	Executive Director	
Esther Bollendorff	Senior Gas Policy Coordinator	

<sup>i</sup> This is if the outdated factor 25 is used to convert methane to CO<sub>2</sub> equivalents. If the factor 29.8 is used, which is the current recommendation by the IPCC to compare the warming potential of methane and CO<sub>2</sub> over 100 years, the standard value +40% equates to 1.9%. If the factor 82.5 recommended for GWP<sub>20</sub> is used, the default value translates to a leakage rate of 0.7%.

<sup>ii</sup> Global Methane Tracker (2024) [https://iea.blob.core.windows.net/assets/d42fc095-f706-422a-9008-6b9e4e1ee616/GlobalMethaneTracker\\_Documentation.pdf](https://iea.blob.core.windows.net/assets/d42fc095-f706-422a-9008-6b9e4e1ee616/GlobalMethaneTracker_Documentation.pdf)

<sup>iii</sup> MethaneSAT: New data show U.S. oil and gas methane emissions over four times higher than EPA estimates (2024) <https://www.methanesat.org/project-updates/new-data-show-us-oil-and-gas-methane-emissions-over-four-times-higher-epa-estimates>

<sup>iv</sup> IMEO: An Eye on Methane 2024 <https://www.unep.org/resources/eye-methane-2024>.