

Proposal to Phase Out Russian Gas Imports

Eurogas Trilogue Recommendations

As Russian gas is phased out, safeguarding the Union's security of supply and avoiding regulatory and administrative barriers to alternative energy sources is essential. Ahead of the trilogue negotiations, Eurogas proposes targeted adjustments to ensure the Regulation remains effective and practical for importers and Member State authorities. These recommendations balance the EU's strategic objective with the need for a secure, efficient energy supply. Eurogas stands ready to support negotiators in implementing a workable, future-proof framework.

Eurogas Recommendations

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1. Impact of the Ban – Balance Regional Security of Supply Implications [Art. 4§3]

Exposure to Russian gas and the capacity to diversify supply vary significantly across the EU. **Several Member States – particularly those that are landlocked or more dependent on Russian gas – face specific challenges** due to infrastructure constraints, higher transportation costs, and limited short-term alternatives.

Eurogas acknowledges the European Parliament’s call to bring forward the deadline for the ban to 1 January 2027, and **calls on the European Commission to conduct a comprehensive assessment to evaluate the implications of this proposal on security of supply and energy prices at a regional level¹.**

Eurogas also highlights the need to clarify how the reporting obligations under the Regulation will interact with the 19th Sanctions Package. Harmonised reporting principles and timelines are essential to avoid inconsistencies. Eurogas notes that while Regulation (EU) 2024/1745 foresees a volumetric reporting structure, this is not separate from the contractual or source data. The reporting obligation in the current draft Regulation is not strictly contract-based, as volumetric information is also essential for monitoring flows.

Commission Proposal (Art.4§3)	EP Mandate	Council Mandate	Eurogas Recommendation
Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a long-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 1 January 2028.	<i>Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a long-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 1 January 2027.</i>	Article 3 shall apply as of 1 January 2028, where the importer can demonstrate to customs — it can be demonstrated to the authorising authorities that imports of natural gas referred to in Article 3 are executed under a long-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 1 January 2028: unless the amendment is covered by paragraph 4.	<i>Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a long term supply contract concluded before 17 June 2025, and — not — amended thereafter, Article 3 shall apply as of 1 January [...], provided that any amendments to such contract after that date do not result in an increase in the contracted quantities.</i>

¹ For example, according to analysis by the Oxford Institute for Energy Studies in “The EU Proposal to Ban Russian Gas Imports: Part 2 – Bringing it forward”, if the ban were advanced to 2026, severe price impacts could arise in parts of Central Europe (higher by \$8-9 per MMBTU, or ~ 25€/MWh in Hungary, Slovakia and Austria), given that the global LNG wave remains in its early stages and production from the Romanian and Turkish Black Sea fields has not yet ramped up.

2. Exempted Countries – Encompass Unequivocally non-Russian Supplies [Art.7§2b]

The European Parliament proposes that no prior authorisation is required where gas is imported from a gas-producing country which prohibits natural gas produced in the Russian Federation, with the Commission tasked to establish and review a list of such countries. This narrower approach, compared to the Council's, may unintentionally constrain imports of non-Russian gas.

In line with the objectives of the Regulation and to **avoid potential disruptions of non-Russian gas supplies**, Eurogas reiterates its call to **limit information and authorisation requirements strictly to gas originating in or exported from the Russian Federation**. Extending these measures beyond that scope risks undermining cooperation with key third-country partners essential for diversification. Combined with ex-ante authorisation measures, the narrower exemption framework could further reduce the available supply pool, even from countries where there is no risk of shipments being rejected or delayed.

The exemption should be **broad** to enable diversification and ensure continued access to non-Russian gas. It should not be restricted to countries banning Russian gas (EP) or to those exporting more than 5 bcm to the EU in 2024 (Council), as such limits would constrain reliable suppliers and undermine diversification goals.

Exemption conditions should be **alternative, stand-alone criteria**, such as having a ban or other restrictive measures on Russian gas, lacking import infrastructure for LNG or pipelines, or having physically disconnected import and export systems. This approach would prevent unintended disruptions to non-Russian gas flows, support legitimate transit via the Union, and allow smaller and emerging suppliers to contribute to EU and Member State energy security.

Commission Proposal (Art.7§2b)	EP Mandate	Council Mandate	Eurogas Recommendation
/	<i>No prior authorisation shall be required where the gas is imported from a gas-producing country which prohibits the import of natural gas produced in the Russian Federation. In order to facilitate the application of paragraph 1 across Member States, the Commission shall, by ... [5 days after entry into force of this Regulation], adopt implementing acts setting out the list of countries which prohibit the import of natural gas</i>	No prior authorisation is required where gas is imported from a country which produces gas and has exported more than 5 bcm of natural gas to the Union in 2024 and has either prohibited the import of Russian gas or is applying other restrictive measures concerning Russian gas, or has no gas infrastructure in place which allows to import LNG or pipeline gas. No later than 5 days after entry into force of this	<i>No prior authorisation shall be required where gas is imported from a gas-producing country which either (i) has prohibited the import of Russian gas, or (ii) applies other restrictive measures concerning Russian gas, or (iii) has no import infrastructure in place allowing LNG or pipeline gas imports, or (iv) has import and export infrastructure that are physically disconnected. No later than five days after the entry into force</i>

	<i>produced in the Russian Federation. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 15a(2).</i>	Regulation, the Commission shall, by means of an implementing decision, draw up the list of such countries and update it as necessary. The report pursuant to Article 15(1) shall include an assessment of the effectiveness of the prior authorisation process pursuant to Article 7(2).	<i>of this Regulation, the Commission shall, by means of an implementing decision, draw up the list of such countries and update it as necessary. The report pursuant to Article 15(1) shall include an assessment of the effectiveness of the prior authorisation process under Article 7(2).</i>
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3. Authorisation Period – Ensuring Supply Continuity with ex-Post Monitoring for non-Russian Imports [Art.7§2a]

The European Parliament proposes a one-month prior authorisation for both Russian and non-Russian gas, while the Council foresees five working days for non-Russian imports. **Rigid ex-ante procedures are not compatible with gas supply realities:** pipeline volumes adjust intra-day, LNG deliveries can be redirected at short notice due to price or weather, and some cargoes, such as from Algeria, take less than a day to reach EU ports. Information on origin, export country, and loading port is already provided to customs authorities ahead of the import under the Union Customs Code, making ex-ante authorisation for non-Russian gas disproportionate and a potential risk to supply security.

Eurogas recommends replacing ex-ante authorisation for non-Russian gas and LNG with **ex-post monitoring**, with submissions valid for the full duration of a contract, so information is required only once per contract. As an alternative, a **one working day notification** could suffice. If ex-ante authorisation is maintained, the Regulation should include a **12-hour response deadline**, after which authorisation is automatically deemed granted to provide certainty for importers.

Commission Proposal (Art.7§2a)	EP Mandate	Council Mandate	Eurogas Recommendation
/	<i>Imports of natural gas produced in countries other than the Russian Federation shall be subject to prior authorisation, except in the cases set out in paragraph 2b. Importers shall provide the customs authorities and</i>	Imports of natural gas where the country of production is not the Russian Federation shall be subject to prior authorisation, except in case those imports fall under paragraph 3. The authorising authorities in the Member State	<i>Imports of natural gas where the country of production is not the Russian Federation may be subject to ex post monitoring by authorising authorities, except in case those imports fall under paragraph 2b.</i>

	<i>other authorities in the Member State where the gas is to be imported or temporarily stored, no later than one month before the planned date of import or temporary storage, with unambiguous evidence to establish the country of production of the natural gas [...].</i>	where the gas is to be released for free circulation shall be provided with evidence establishing the country of production of that natural gas no later than 5 working days before its entry into the customs territory.	
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4. Penalties Regime – Ensure Proportionality and Avoid Market Disruption [Art.10a]

Eurogas acknowledges the objective of the Regulation to progressively phase out Russian gas imports. To facilitate compliance, it is essential to **clarify regulatory obligations** and ensure workable measures on **origin tracking**, particularly for gas traded on spot markets.

At the same time, penalties should remain **proportional to the infringement**. A minimum level of 5% of global turnover, as proposed by the European Parliament, may not always be appropriate. Excessive penalties could also create unintended market effects, for example by incentivising LNG players to **reroute non-Russian cargoes away from EU ports due to uncertainty as to whether an import will be authorised**, particularly if the list of exempted countries is not comprehensive or ex-ante requirements are too rigid, undermining the Union's supply and diversification objectives.

Commission Proposal (Art.10a§1)	EP Mandate	Council Mandate	Eurogas Recommendation
/	<i>Notwithstanding provisions in Regulation (EU) No 952/2013, the Member States shall lay down the rules on penalties applicable to infringements of the provisions of Chapter II, Articles 7 and 8 and Chapter IIIa and shall take all measures necessary to ensure that they are implemented. The penalties provided for shall be effective,</i>	/	<i>Commission Proposal or Council Mandate.</i>

	<p><i>proportionate, and dissuasive, and shall include administrative fines. In determining the penalties, Member States shall take into account the nature, gravity, and duration of the infringement, the degree of cooperation with the competent authorities, any financial benefits gained or losses avoided by the company as a result of the infringement, any previous infringements by the company, and any mitigating or aggravating circumstances applicable to the case.</i></p> <p><i>The minimum administrative fines shall be 5% of the undertaking's total worldwide annual turnover for the preceding financial year.</i></p>		
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5. Origin Tracking – Ensure a Proportionate and Practical Approach

The Commission has identified gaps in data on energy security, including the **traceability of gas imports**, as part of its Security of Supply framework review. As highlighted by Eurogas in the context of the EU Methane Regulation, precisely identifying the origin of gas can be **challenging for EU importers**, particularly in **hub-based trades and complex value chains** where volumes are comingled, pooled, and re-traded before reaching the EU.

Eurogas recommends that the Regulation **explicitly acknowledges** that, in such complex value chains, it may not be possible at the time of implementation to identify the exact production site of imported gas, and that the Regulation may as a consequence prevent non-Russian volumes from entering the Union market. Furthermore, the Regulation should **clarify upfront which documentation** constitutes acceptable and sufficient “unambiguous evidence” of origin and **limit reporting requirements** to data already provided under existing mechanisms (e.g., Union Customs Code, REMIT) or, alternatively, allow submission of information on a **best effort basis**.

5.1. Recognise Practical Challenges in Identifying Gas Producers [Art. 7§2(e)]

Eurogas notes that the Article 7§2(e) requirement to identify the gas producer is often impractical. In many cases, the producer cannot currently be determined due to multiple trades and complex value chains. There are generally no regulatory obligations or contractual arrangements to track gas back to its production facility. Mandating producer-level disclosure would not be feasible by the date of entry into force of this Regulation, and could disrupt trading practices and EU security of supply. Eurogas supports the Council mandate removing this requirement.

Commission Proposal (Art. 7§2(e))	EP Mandate	Council Mandate	Eurogas Recommendation
(e) the producer of the gas and the country of production, and, as appropriate, the country where the gas was further processed;	(e) <i>the producer of the gas and the country of production, and, as appropriate, the country where the gas was further processed;</i>	(e) the producer of the gas and the country of production, and, as appropriate, the country where the gas was further processed; deleted	<i>Council mandate.</i>

5.2. Clarify Sufficient “Unambiguous Evidence” Upfront or Leave Implementation to Member States [Art. 7§2a]

The European Parliament also proposes to strengthen documentation requirements under Article 7 by requiring importers to provide “unambiguous evidence” of the country of production of natural gas, and tasks the Commission with defining minimum standards for such evidence through an implementing act.

Eurogas cautions that an implementing act setting minimum standards for “unambiguous evidence” would only be meaningful if compliance with those standards automatically guarantees import authorisation. If, instead, the implementing act does not prevent Member State authorities from requesting additional documentation, it would undermine predictability, increase administrative burdens, and create uncertainty for importers.

Ideally, the rules on proof of origin should be clearly defined in the primary legislation in order to provide clarity to the market. Given their operational experience and direct responsibility for maintaining supply security, Member States may be well placed to ensure that implementation remains practical and proportionate.

Commission Proposal (Art. 7§2a)	EP Mandate	Council Mandate	Eurogas Recommendation
/	<i>[...] Importers shall provide the customs authorities and other authorities in the Member State where the gas is to be imported or temporarily stored, with unambiguous evidence to establish the country</i>	Imports of natural gas where the country of production is not the Russian Federation shall be subject to prior authorisation, except in case those imports fall under paragraph 3. The authorising authorities	<i>Imports of natural gas where the country of production is not the Russian Federation may be subject to ex post monitoring by authorising authorities, except in case those</i>

	<p>of production of the natural gas.</p> <p>In order to ensure uniform application of paragraph 1 across Member States, the Commission shall, by ... [5 days after entry into force of this Regulation], adopt implementing acts determining the minimum standards for evidence referred to in that paragraph, including the type, format and authentication requirements. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 15a(2). [...]</p>	<p>in the Member State where the gas is to be released for free circulation shall be provided with evidence establishing the country of production of that natural gas no later than 5 working days before its entry into the customs territory.</p>	<p>imports fall under paragraph 2b.</p>
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5.3. Limit Information Requests to Existing Documentation [Art. 7§1]

The EP's "independent verification" requirement may be difficult to implement today and could create inconsistencies across operators and Member States. For instance, the request for upstream delivery documentation is unclear and not related to existing documentation, such as Bills of Lading for LNG cargoes. Eurogas recommends limiting the obligation to provide appropriate evidence to documentation that is currently used in commodity trading and is international good practice.

Commission Proposal (Art. 7§1)	EP Mandate	Council Mandate	Eurogas Recommendation
Importers of natural gas shall provide customs authorities with all relevant information necessary to implement Articles 3 and 4, in particular appropriate evidence to verify whether the natural gas originates in or is exported directly or	Importers of natural gas, and/or natural gas undertakings where appropriate, shall provide customs authorities with all relevant information necessary to implement Articles 3 and 4, in particular appropriate evidence, such as evidence of	Importers of natural gas shall provide customs authorities with all relevant information necessary to implement Articles 3 and 4, in particular appropriate evidence to verify whether the natural gas originates in or is exported directly or indirectly from the	Importers of natural gas or LNG which originate in or are exported from the Russian Federation shall provide customs authorities with appropriate evidence for the application of Article 4, to assess whether the conditions set out in that Article are met.

indirectly from the Russian Federation.	<i>independent verification of the country of production, which may include upstream delivery documentation and satellite tracking of LNG tankers to verify whether the natural gas originates in or is exported directly or indirectly from the Russian Federation.</i>	Russian Federation. Deleted.	
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5.4. Concerns Regarding the Introduction of Risk-Based Assessment of LNG Terminal [Art.9§4]

The European Parliament proposes that the Commission carries out a risk-based assessment of LNG terminals to identify those with a reasonable suspicion that imported gas is wholly or partially of Russian origin. Eurogas notes that it is unclear whether this applies to intra-EU or extra-EU terminals, and what the consequences of such a designation would be. For instance, if imports from a terminal are restricted because it is classified as “high-risk”, force majeure could be triggered depending on contract structures. This may allow customers to dispute undelivered LNG, while terminal users remain liable for long-term capacity tariffs, potentially incentivising market participants to divert cargoes away from listed terminals and undermining security of supply. Given these significant risks and uncertainties, Eurogas considers that introducing such a risk-based terminal list should be avoided.

Commission Proposal (Art.9§4)	EP Mandate	Council Mandate	Eurogas Recommendation
/	<i>The Commission shall carry out a risk-based analysis of LNG terminals, in order to identify those for which there are reasonable grounds to suspect that there is a risk that the natural gas being imported is wholly or partially of Russian origin. Based on that analysis, the Commission shall, by three months after the entry into force of this Regulation, establish a list of such LNG terminals. That list shall</i>	/	<i>Commission proposal or Council Mandate.</i>

	<i>be reviewed at least three months and, where necessary, updated. Where appropriate, the Commission shall propose measures, including legislative proposals, to mitigate those risks.</i>		
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5.5. Ensure Proportionate Requests for Commercially Sensitive Information [Art.13(2)(a)]

Eurogas expresses strong reservations about the broad information request powers granted to the Commission under Article 13(2)(a)(v–vii) in connection with the Gas Security of Supply Regulation. The ability to access detailed contractual clauses – including force majeure provisions, governing law, arbitration mechanisms, and other commercial agreements – goes beyond what is necessary for customs or compliance checks. Such requirements raise serious concerns regarding commercial confidentiality, potentially undermining trust in the regulatory framework. Eurogas recommends ensuring proportionality and safeguarding commercially sensitive information.

Commission Proposal (Art.13(2)(a))	EP Mandate	Council Mandate	Eurogas Recommendation
(v) conditions for the suspension or termination of gas deliveries, including force majeure provisions;	<i>(v) conditions for the suspension or termination of gas deliveries, including force majeure provisions;</i>	(v) conditions for the suspension or termination of gas deliveries, including force majeure provisions;	/ Delete
(vi) information on which law is governing the contract and which arbitration mechanism is chosen;	<i>(vi) information on which law is governing the contract and which arbitration mechanism is chosen;</i>	(vi) information on which law is governing governs the contract and which arbitration mechanism is chosen;	/ Delete
(vii) key elements of other commercial agreements that are relevant for the execution of the gas supply contract, excluding price information.;	<i>(vii) key elements of other commercial agreements that are relevant for the execution of the gas supply contract, excluding price information.;</i>	(vii) key elements of other commercial agreements that are relevant for the execution of the gas supply contract, excluding price information.;	/ Delete

5.6. Recognise the Challenges of Gas Traceability under National Diversification Plans [Art.11§2]

The European Parliament proposes additional requirements for national diversification plans, including breakdowns of Russian gas consumption and measures to ensure traceability of gas, including spot market

trades. Eurogas notes that in complex, hub-based value chains, volumes are often commingled, pooled, and re-traded, making precise identification of the production site challenging. Regulations should explicitly acknowledge these practical limitations. While Russian pipeline or LNG exports from interconnection points bordering Russia or Russian LNG terminals could be readily identified, hub-traded gas presents greater challenges.

Commission Proposal (Art.11§2)	EP Mandate	Council Mandate	Eurogas Recommendation
/	<i>(ba) measures in place and planned at national level to ensure full transparency, traceability of natural gas which originates in or is exported directly or indirectly from the Russian Federation, including measures on verification of possible re-labelled imports;</i>	/	/
	<i>(bb) measures in place to ensure that natural gas traded on spot markets is traceable to its country of production;</i>	/	

6. Monitoring and Review – Address SoS and Affordability Risks [Art.15]

Eurogas recommends retaining the flexibility foreseen in Article 15, which allows for the temporary suspension of Chapter Two in the event of a sudden and serious threat to security of supply. This safeguard is essential to recognise the specific vulnerabilities of certain Member States and to preserve system stability during crises. To enhance legal clarity and predictability, the Regulation should specify the conditions under which the exemption can be triggered, for example when a Member State declares a national alert level under the Gas Security of Supply Regulation (EU) 2017/1938.

Commission Proposal (Art.15)	EP Mandate	Council Mandate	Eurogas Recommendation
The Commission shall continuously monitor the development of the Union's energy market, notably with respect to potential gas supply dependencies or other security of supply risks	The Commission shall continuously monitor the development of the Union's energy market, notably with respect to potential gas supply dependencies or other security of supply risks	The Commission shall continuously monitor the development of the Union's energy market [...]. In the case of sudden and significant developments,	<i>The Commission shall continuously monitor the development of the Union's energy market, notably with respect to potential gas supply dependencies or other security of supply risks</i>

<p>in relation to energy imports from the Russian Federation. In the case of sudden and significant developments, seriously threatening the security of supply of one or more Member States, the Commission may authorise one or more Member States to temporarily suspend the application of Chapter Two of this Regulation, in whole or in part. The Commission decision may contain certain conditions, in particular, to ensure that any suspension is strictly limited to addressing the threat.</p>	<p>in relation to energy imports from the Russian Federation. In the case of sudden and significant developments, seriously threatening the security of supply of one or more Member States, the Commission may authorise one or more Member States to temporarily suspend the application of Chapter Two of this Regulation, in whole or in part. The Commission decision may contain certain conditions, in particular, to ensure that any suspension is strictly limited to addressing the threat. Deleted</p>	<p>seriously threatening the security of energy supply of one or more Member States, the Commission may temporarily suspend the application of Chapter II of this Regulation in one or more Member States, in whole or in part. The Commission may, in such a situation, also suspend the requirement of prior authorisation pursuant to Article 7(2). The Commission's decision shall contain certain conditions, in particular to ensure that any suspension is strictly limited to addressing the threat. The Commission shall inform the Gas Coordination Group about any suspensions.</p>	<p><i>in relation to energy imports from the Russian Federation. In the case of sudden and significant developments, seriously threatening the security of supply of one or more Member States, the Commission may authorise one or more Member States to temporarily suspend the application of Chapter Two of this Regulation, in whole or in part. In such a situation, the Commission may also suspend the requirement of prior authorisation pursuant to Article 7(2). The Commission's decision shall include conditions ensuring that any suspension is strictly limited to addressing the threat, and shall specify the criteria for triggering the exemption, for example when a Member State declares a national alert level under the Gas Security of Supply Regulation (EU) 2017/1938. The Commission shall inform the Gas Coordination Group of any suspensions and related conditions.</i></p>
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7. Import(er) Definition – Align with Customs Code [Art.2(6a)&(7)]

To enhance legal clarity and facilitate compliance, Eurogas recommends refining the definition of “importer” and imports in Article 2 (6a) and (7). Currently, it may create uncertainty about who holds reporting

obligations, as buyers under gas supply contracts often do not control the upstream supply chain and cannot verify the origin of gas delivered within the EU. Assigning them this responsibility could expose European companies to disproportionate legal and financial risks. Eurogas suggests aligning the definition with the Union Customs Code, in particular the *consignee* as referred to in box 8 of the Single Administrative Document (SAD)². This would ensure legal consistency and simplify enforcement.

Commission Proposal (Art.2)	EP Mandate	Council Mandate	Eurogas Recommendation
/	<i>/(20a) ‘import’ means the placing of goods under release for free circulation, as referred to in Article 201 of Regulation (EU) No 952/2013 of the European Parliament and of the Council;</i>	(6a) ‘import’ means the placing of goods under release for free circulation, as referred to in Article 201 of Regulation (EU) No 952/2013 of the European Parliament and of the Council;	<i>EP and Council Mandate.</i>
(7) ‘importer’ means a natural or legal person who has the power to determine and has determined that natural gas from a third country is to be brought into the customs territory of or otherwise placed on the Union market;	<i>(7) ‘importer’ means a natural or legal person who has the power to determine and has determined that natural gas from a third country is to be brought into the customs territory of or otherwise placed on the Union market;</i>	(7) ‘importer’ means the natural or legal person that is the declarant in the relevant customs declaration as defined in Article 5, point (15), of Regulation (EU) No 952/2013 of the European Parliament and of the Council, or otherwise a natural or legal person who has the power to determine and has determined that natural gas from a third country is to be brought, including affiliated undertakings, that brings the goods into the Union customs territory of or otherwise placed on the Union market;	<i>(7) ‘importer’ means the party that makes the customs declaration or in whose name the customs declaration is submitted and who is ultimately responsible for any customs liabilities irrespective of representation. This party is often referred to as the consignee (Box 8 of the Single Administrative Document) as they are responsible for receiving the goods, while not necessarily being the owner of the goods in question.</i>

² European Commission, [The Single Administrative Document \(SAD\)](#), (2025).

8. Contract Amendments – Ensure Flexibility [Art.4]

Eurogas notes that treating all contract amendments as new contracts overlooks standard business practices. Amendments for administrative or compliance purposes, or to reduce volumes, should not trigger Art.3 prohibitions. Only amendments increasing contracted quantities should be considered new, preserving operational flexibility while supporting the phase-out objective.

Commission Proposal (Recital 17, Art.4)	EP Mandate	Council Mandate	Eurogas Recommendation
Recital (17) In order to avoid that import volumes provided for in existing supply contracts are increased and not decreased, amendments to existing supply contracts should be considered as new contracts for the purposes of this Regulation, and increases of import volumes by using contractual flexibilities should not benefit from the transition period.	<i>Recital (17) In order to avoid that import volumes provided for in existing supply contracts are increased and not decreased, amendments to existing supply contracts should be considered as new contracts for the purposes of this Regulation, and increases of import volumes by using contractual flexibilities should not benefit from the transition period.</i>	Recital (17) In order to avoid that import volumes provided for in existing supply contracts are from being increased and not decreased , amendments to existing supply contracts should be considered as new contracts for the purposes of this Regulation, and increases of import volumes by using contractual flexibilities should not benefit from the transition period. Exceptions should be provided for certain cases of necessary amendments to existing contracts, provided they do not increase contracted quantities or the timing of delivery. Price variations resulting from price indexation already provided for in existing supply contracts do not constitute an amendment to existing supply contracts.	<i>Recital (17) In order to avoid that import volumes provided for in existing supply contracts are increased and not decreased, amendments to existing supply contracts which result in an increase in the contracted quantities should be considered as new contracts for the purposes of this Regulation, and increases of import volumes by using contractual flexibilities should not benefit from the transition period.</i>
Art.4(1) Where the importer can	<i>Art.4(1) Where the importer can</i>	Art.4(1) Article 3 shall apply as	<i>Art.4(1) Where the importer can</i>

demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a short-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 17 June 2026.	<i>demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a short-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 17 June 2026.</i>	of 17 June 2026, where the importer can demonstrate to customs it can be demonstrated to the authorising authorities that imports of natural gas referred to in Article 3 are executed under a short-term supply contract, concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 17 June 2026, unless the amendment is covered by paragraph 4.	<i>demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a short-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 17 June 2026, provided that any amendments to such contract after that date do not result in an increase in the contracted quantities.</i>
Art.4(2)b (iii) /	<i>Art.4(2)b (iii) /</i>	Art.4(2)b (iii) which was concluded before 17 June 2025 and not amended thereafter, unless the amendment is covered by paragraph.	<i>/</i>
Art.4(3) Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under	<i>Art.4(3) Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a long-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 1 January 2028.</i>	Art.4(3) Article 3 shall apply as of 1 January 2028, where the importer can demonstrate to customs it can be demonstrated to the authorising authorities that imports of natural gas referred to in Article 3 are executed under a long-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 1 January 2028, unless the amendment is covered by paragraph 4.	<i>Art.4(3) Where the importer can demonstrate to customs authorities that imports of natural gas referred to in Article 3 are executed under a long-term supply contract concluded before 17 June 2025, and not amended thereafter, Article 3 shall apply as of 1 January 2028, provided that any amendments to such contract after that date do not result in an increase in the contracted quantities.</i>