



22/07/2025

**AMENDMENTS: 16**

**Inese Vaidere, Ville Niinistö**

Phasing out Russian natural gas imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938

**Proposal for a regulation** COM(2025)0828 - 2025/0180(COD)

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Agence Europe

## Amendment 1

**Andrea Wechsler, Aura Salla, Pilar del Castillo Vera, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Inese Vaidere, Susana Solís Pérez, Matej Tonin**

### Proposal for a regulation

#### Recital 7 a (new)

*Text proposed by the Commission*

*Amendment*

***(7 a) The use of circumvention practices by the Russian Federation, such as the employment of so-called “dark” or “shadow fleets” in the context of the transport of oil and oil products, raises concerns about the use of similar methods to conceal the true origin destination of liquefied natural gas (LNG) cargoes, thereby undermining the objectives of this Regulation.***

Or. en

#### *Justification*

*This amendment ensures that the Regulation explicitly recognizes the existing threat of circumvention practices, while anticipating the risk of similar opaque practices being adapted to LNG, thereby strengthening the Union’s ability to safeguard the integrity of the import ban and its essential security interests.*

## Amendment 2

**Andrea Wechsler, Aura Salla, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Inese Vaidere, Matej Tonin**

### Proposal for a regulation

#### Recital 14

*Text proposed by the Commission*

*Amendment*

(14) An exemption from the prohibition of gas imports as of 1 January 2026 should also be granted for existing long term supply contracts. Indeed, importers holding long-term contracts will usually need more

(14) An exemption from the prohibition of gas imports as of 1 January 2026 should also be granted for existing long term supply contracts. Indeed, importers holding long-term contracts will usually need more

time to find alternative supply routes and sources than short-term contract holders, also as long-term contracts usually concern significantly larger volumes over time than short-term contracts. A transition time should therefore be introduced to give holders of long-term contracts sufficient time to diversify their supplies in an orderly manner.

time to find alternative supply routes and sources than short-term contract holders, also as long-term contracts usually concern significantly larger volumes over time than short-term contracts. A transition time should therefore be introduced to give holders of long-term contracts sufficient time to diversify their supplies in an orderly manner. ***The Commission shall provide EU companies with effective and legally sound toolkits to facilitate their efforts to get out of long-term contracts with Russian suppliers without incurring penalties.***

Or. en

#### *Justification*

*This addition reiterates the wording of the EP “REPORT on the security of energy supply in the EU” from 30 June 2025 and is meant to secure support for buyers that face potential contractual liability in the context of the operation of the force majeure induced termination of contracts and possibly ensuing arbitration.*

#### **Amendment 3**

**Andrea Wechsler, Aura Salla, Pilar del Castillo Vera, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Susana Solís Pérez, Matej Tonin**

#### **Proposal for a regulation**

#### **Article 2 – paragraph 1 – point 16**

##### *Text proposed by the Commission*

(16) ‘contracted quantities’ means the quantities of natural gas that **the** buyer or the importer is obligated to purchase and **the** seller or **the** exporter is obligated to provide, as specified in the supply contract, excluding volumes arising from adjustments to the contract, such as make-up quantities, shortfall recoveries, or other volumetric modifications under the terms of the contract; for long-term supply contracts, it means the annual contracted

##### *Amendment*

(16) ‘contracted quantities’ means the quantities of natural gas that **a** buyer or the importer is obligated to purchase and **a** seller or exporter is obligated to provide, as specified in the supply contract, **but** excluding volumes arising from adjustments to the contract, such as make-up quantities, shortfall recoveries, or other volumetric modifications under the terms of the contract; for long-term supply contracts, it means the annual contracted

quantities;

quantities;

Or. en

#### *Justification*

*By omitting specific volumes from these amendments, the effective 'contracted quantities' are reduced in comparison to the volumes that an EU importer may otherwise be contractually obligated to procure under the terms of the original supply agreement.*

#### **Amendment 4** **Andrea Wechsler**

#### **Proposal for a regulation** **Article 4 – paragraph 1**

##### *Text proposed by the Commission*

1. Where the importer can 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.

##### *Amendment*

1. Where the importer can 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, ***provided that any amendments to such contract after that date do not result in an increase in the contracted quantities or price***, Article 3 shall apply as of 17 June 2026.

Or. en

#### *Justification*

*As it currently is proposed, the Regulation prohibits any amendments to existing contracts related to gas imports or services. However, this blanket restriction is neither targeted nor proportionate to the Regulation's intended objectives, as contract amendments might be necessary for the proper execution of the contract until its expiration date (2028). Therefore, only those amendments that may constitute an attempt to circumvent the Regulation's obligations should be subject to restriction. Specifically, this refers to amendments that would increase the initially agreed reference volumes or price.*

#### **Amendment 5** **Andrea Wechsler**

**Proposal for a regulation**  
**Article 4 – paragraph 2 – point b**

*Text proposed by the Commission*

(b) that a long-term supply contract with delivery at the virtual trading point of that landlocked country for the import of natural gas in gaseous state via pipelines exists, which originates in or is exported directly or indirectly from the Russian Federation, and which was concluded before 17 June 2025 and not amended thereafter, Article 3 shall apply as of 1 January 2028.

*Amendment*

(b) that a long-term supply contract with delivery at the virtual trading point of that landlocked country for the import of natural gas in gaseous state via pipelines exists, which originates in or is exported directly or indirectly from the Russian Federation, and which was concluded before 17 June 2025 and not amended thereafter, ***provided that any amendments to such contract after that date do not result in an increase in the contracted quantities or price***, Article 3 shall apply as of 1 January 2028.

Or. en

*Justification*

*As it currently is proposed, the Regulation prohibits any amendments to existing contracts related to gas imports or services. However, this blanket restriction is neither targeted nor proportionate to the Regulation's intended objectives, as contract amendments might be necessary for the proper execution of the contract until its expiration date (2028). Therefore, only those amendments that may constitute an attempt to circumvent the Regulation's obligations should be subject to restriction. Specifically, this refers to amendments that would increase the initially agreed reference volumes or price.*

**Amendment 6**  
**Andrea Wechsler**

**Proposal for a regulation**  
**Article 4 – paragraph 3**

*Text proposed by the Commission*

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.

*Amendment*

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, ***provided that any amendments to such contract after***

*that date do not result in an increase in the contracted quantities or price*, Article 3 shall apply as of 1 January 2028.

Or. en

#### *Justification*

*As it currently is proposed, the Regulation prohibits any amendments to existing contracts related to gas imports or services. However, this blanket restriction is neither targeted nor proportionate to the Regulation's intended objectives, as contract amendments might be necessary for the proper execution of the contract until its expiration date (2028). Therefore, only those amendments that may constitute an attempt to circumvent the Regulation's obligations should be subject to restriction. Specifically, this refers to amendments that would increase the initially agreed reference volumes or price.*

#### **Amendment 7**

**Andrea Wechsler, Aura Salla, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Inese Vaidere, Matej Tonin**

#### **Proposal for a regulation**

#### **Article 5 – paragraph 1**

##### *Text proposed by the Commission*

The provision of long-term LNG terminal services in the EU to entities established in the Russian Federation or entities controlled by natural persons or legal entities established in the Russian Federation shall be prohibited as of 1 January 2026.

##### *Amendment*

The provision of long-term LNG terminal services in the EU to entities established in the Russian Federation or entities controlled by natural persons or legal entities established in the Russian Federation shall be prohibited as of 1 January 2026. ***Notwithstanding any contractual provision to the contrary, a provider of LNG terminal services who reallocates or resells capacity in compliance with Chapter II of the Regulation shall not incur liability for such actions.***

Or. en

#### *Justification*

*This measure is necessary to achieve the Regulation's objectives. As noted in Recital (9), long-term capacity bookings by Russian companies at EU LNG terminals risk obstructing alternative imports through capacity hoarding, despite the services ban. Such practices could prolong*

*Russian influence over EU energy markets and repeat past market distortions, as documented in Annex III (§1.5.3) and the Commission staff working document (Section 2).*

#### **Amendment 8**

**Andrea Wechsler, Aura Salla, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Inese Vaidere, Susana Solís Pérez, Matej Tonin**

#### **Proposal for a regulation**

##### **Article 6 – paragraph 1**

*Text proposed by the Commission*

Where the provider of long-term LNG terminal services can demonstrate to customs authorities that those services are provided under a contract concluded before 17 June 2025 and not amended thereafter, Article 5 shall apply as of 1 January 2028.

*Amendment*

Where the provider of long-term LNG terminal services can demonstrate to customs authorities that those services are provided under a contract concluded before 17 June 2025 and not amended thereafter, Article 5 shall apply as of 1 January 2028. ***Those long-term LNG terminal service contracts shall be deemed lawfully terminated in accordance with this Regulation. The provider shall not incur liability due to such termination.***

Or. en

*Justification*

*The proposed services ban is unlikely to achieve its objective of freeing up European LNG terminal capacity and would instead create a complex legal landscape, exposing stakeholders to protracted and costly disputes, including litigation and arbitration.*

#### **Amendment 9**

**Andrea Wechsler, Aura Salla, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Susana Solís Pérez, Matej Tonin**

#### **Proposal for a regulation**

##### **Article 7 – paragraph 1 – subparagraph 1**

*Text proposed by the Commission*

*Amendment*

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 Russian Federation.***

Importers of natural gas ***entering to the Union through the interconnection points included in Article 7 (4), and importers of LNG which originates in or is exported directly or indirectly from the Russian Federation shall provide customs authorities with all relevant information necessary for the application of Article 4 with appropriate evidence to assess whether the conditions set out in that Article are met.***

Or. en

*Justification*

*The current wording of the Regulation imposes a blanket reporting obligation on all gas imports into the EU, regardless of origin, which is disproportionate to its stated objective of targeting Russian-origin gas. To ensure legal proportionality and administrative efficiency, the reporting requirements should be narrowly tailored to apply only to imports of gas originating from, or exported directly or indirectly by, Russia.*

#### **Amendment 10**

**Andrea Wechsler, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Matej Tonin**

#### **Proposal for a regulation**

#### **Article 7 – paragraph 1 – subparagraph 2**

*Text proposed by the Commission*

*Amendment*

***For the purposes of application of Article 4, importers of natural gas shall provide customs authorities and other authorities involved in the monitoring pursuant to Article 9 and 10, with appropriate evidence to assess whether the conditions set out in that Article are met.***

***deleted***

Or. en

## Amendment 11

Andrea Wechsler, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Matej Tonin

### Proposal for a regulation

#### Article 7 – paragraph 3

##### *Text proposed by the Commission*

3. Customs authorities or other authorities involved in the monitoring pursuant to Article 9 and 10, may request more detailed information, except price information, if the required information is necessary to assess whether the conditions set out in Article 3 and 4 are fulfilled.

***Customs authorities may, in particular, require importers to submit the text of certain provisions of the gas supply contract in full or the text of entire gas supply contract, except price information, especially where certain contractual provisions are interrelated, or where the full knowledge of the formulation of the contractual provisions is crucial for the assessment.*** In case customs authorities consider that the evidence provided is not conclusive, they may refuse the release for free circulation of the goods.

##### *Amendment*

3. Customs authorities or other authorities involved in the monitoring pursuant to Article 9 and 10, may request more detailed information, except price information, if the required information is necessary to assess whether the conditions set out in Article 3 and 4 are fulfilled. In case customs authorities consider that the evidence provided is not conclusive, they may refuse the release for free circulation of the goods.

Or. en

##### *Justification*

*Companies remain free to submit full gas supply contracts if they deem it necessary. There is no legal need to mandate submission of entire contracts through the Regulation.*

## Amendment 12

Andrea Wechsler, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Matej Tonin

### Proposal for a regulation

#### Article 7 – paragraph 4 – introductory part

*Text proposed by the Commission*

*Amendment*

4. ***Natural gas entering to the Union through*** the following interconnection points shall be ***presumed to be exported directly or indirectly from the Russian Federation, unless the importer can provide unambiguous evidence to customs authorities that the imported natural gas originates in a country other than the Russian Federation that has been in transit through the Russian Federation.***

4. The following interconnection points shall be ***relevant for the assessment of Article 7(1):***

Or. en

**Amendment 13**  
**Andrea Wechsler**

**Proposal for a regulation**  
**Article 13 – paragraph 1 – point 2**  
Regulation 2017/1938  
Article 14 (6)

*Text proposed by the Commission*

*Amendment*

(2) ***Article 14(6) is amended as follows:*** ***deleted***

(a) ***in the first subparagraph, the following point (c) is added:***

(c) ***to the Commission and to the concerned competent authority the following information relating to supply contracts for natural gas which originates in or is exported directly or indirectly from the Russian Federation:***

(i) ***the information referred to in Article 7(2) of Regulation (EU) XX/2025 - this Regulation;***

(ii) ***information on quantities to be supplied and taken, including possible flexibilities under take-or-pay provisions or deliver-or-pay provisions;***

- (iii) delivery schedules (LNG) or nominations (pipeline gas);*
- (iv) possible contractual flexibilities concerning the annual contracted quantities, including make-up quantities;*
- (v) conditions for the suspension or termination of gas deliveries, including force majeure provisions;*
- (vi) information on which law is governing the contract and which arbitration mechanism is chosen;*
- (vii) key elements of other commercial agreements that are relevant for the execution of the gas supply contract, excluding price information.;*

,

- (b) the following third and fourth subparagraphs are added:*

,

*The information referred to in point (c) shall be provided for each contract in a disaggregated format, including the full relevant text parts, excluding price information, notably where the full knowledge of the formulation of the contractual provisions is crucial for the security of supply assessment or where certain contractual provisions are interrelated.*

*Providers of LNG terminal services shall provide the Commission with information concerning services booked by customers from the Russian Federation, customers controlled by undertakings from the Russian Federation, including contracted services, affected quantities and contract duration.;*

,

Or. en

### *Justification*

*The draft Regulation's Article 10 already establishes a framework for information sharing between national authorities and the European Commission. In this context, Article 13(2) introduces overlapping reporting obligations without a clear rationale. It is therefore recommended that this provision be removed to avoid unnecessary duplication. National authorities and the European Commission already possess robust legal tools for collecting and exchanging information on gas supply contracts, particularly for assessing the security of supply in crisis or emergency scenarios. These powers are explicitly provided under Article 14(6) of Regulation (EU) 2017/1938.*

#### **Amendment 14**

**Andrea Wechsler, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Matej Tonin**

#### **Proposal for a regulation**

**Article 13 – paragraph 1 – point 2 – point a**

EU 2017/1938

Article 14 (6)

*Text proposed by the Commission*

*Amendment*

**(iii) delivery schedules (LNG) or nominations (pipeline gas);**

**deleted**

Or. en

### *Justification*

*Accordingly, and in line with the principle of proportionality, Article 13 of the proposed amendments to Regulation (EU) 2017/1938 should be revised to remove the requirement to report “(iii) delivery schedules (LNG) or nominations (pipeline gas),” as this information may not accurately reflect actual imports and imposes administrative burdens.*

#### **Amendment 15**

**Andrea Wechsler, Aura Salla, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Matej Tonin**

#### **Proposal for a regulation**

**Article 15 – title**

*Text proposed by the Commission*

*Amendment*

Monitoring *and review*

Monitoring

Or. en

### **Amendment 16**

**Andrea Wechsler, Aura Salla, Angelika Niebler, Wouter Beke, Christian Ehler, Eva Maydell, Letizia Moratti, Massimiliano Salini, Stefan Berger, Virgil-Daniel Popescu, Daniel Caspary, Jens Gieseke, Jan Farský, Hildegard Bentele, Susana Solís Pérez, Matej Tonin**

### **Proposal for a regulation Article 15 – paragraph 1**

*Text proposed by the Commission*

*Amendment*

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 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.***

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 in relation to energy imports from the Russian Federation. F2027n.

Or. en

### *Justification*

*The authorization by the Commission to suspend Chapter 2 of this Regulation might weaken the application of force majeure and should therefore be deleted.*