

S15 – Osservazioni in merito ai criteri di regolazione della sicurezza del servizio e dell'eventuale necessità di introdurre obblighi di sicurezza in relazione ai pozzi di stoccaggio

The Environmental Defense Fund commends ARERA for being the first national regulator to demonstrate an understanding that surveillance activities aiming at preventing accidents (safety) are distinct from monitoring activities aimed at assessing and measuring methane leaks. By addressing the storage segment with the same attention as the DSO and TSO level, ARERA demonstrates a holistic understanding that methane emissions from oil and gas must be tackled across the supply chain.

In the context of designing effective regulations the Environmental Defense Fund wishes to bring to ARERA's attention the IEA [Methane Tracker](#), a one-stop-shop, which was launched on Tuesday 16 July 2019 and which highlights:

“It is crucial for the oil and gas industry to be proactive in limiting, in all ways possible, the environmental impact of oil and gas supply, and for policy makers to recognise this is a pivotal element of global energy transitions [...] there are limits to what can be achieved by voluntary action because the pool of those willing to take such action is limited, and because the actions themselves may fall short of what is desirable from a public policy perspective. Effective targets, policies and regulations established by governments are also therefore essential to bring emissions into line with the trajectory in the Sustainable Development Scenario. The methane tracker provides essential information to help governments and other stakeholders design effective strategies”.

In view of the above, the Environmental Defense Fund suggests requiring all stakeholders acting in the different segments of the gas supply chain, from upstream to the distribution level, to include quantitative methane emissions data in their annual sustainability or environmental activity reports. Annual reporting of the number of events where leakages took place and causes of the leakages will allow the Regulator to track and understand if the level of emissions is going down.