

Brussels, 27/05/2026

To:

Executive Vice-President for Prosperity and Industrial Strategy, **Mr Stéphane Séjourné**  
Commissioner for Energy and Housing, **Mr Dan Jørgensen**, Commissioner for Trade and Economic  
Security; Interinstitutional Relations and Transparency, **Mr Maroš Šefčovič**

CC:

Director-General, DG ENER, **Ms Ditte Juul Jørgensen**  
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**Subject: Call for Action: Removing Barriers to the Internal Energy Market by Enabling Ireland's Participation in Cross-Border Trade of Renewable Gas**

**The co-signatories of this joint statement urge the European Commission to take immediate action to:**

- 1. Recognise Ireland as an integral part of the EU interconnected gas grid and associated mass balancing system;**
- 2. Enable cross-border trade of sustainable renewable gases from third countries, including the United Kingdom, within the Union Database (UDB).**

Pursuant to Directive (EU) 2015/1535 (1), the Irish authorities notified the European Commission on 23 December 2025 of a proposed national Renewable Heat Obligation (RHO)<sup>1</sup> scheme under the Renewable Heat Obligation Act (2025).

In its detailed opinion<sup>2</sup> assessing the matter at stake, the European Commission stated that “*no pipeline-based biomethane from the UK or continental Europe can be imported to Ireland nor it can eligibly count towards the Irish contribution to the RED target*”, for as long as the United Kingdom does not participate to the Union Database (UDB) or meet the applicable sustainability requirements for renewable gaseous fuels. This interpretation is understood with respect to the UK's status as a third country following Brexit and where European Regulation is no longer directly transposed. This may justify proportionate safeguards for traceability, certification and double-counting prevention in third countries. However, this should not justify a blanket exclusion of pipeline-based biomethane imports into Ireland where the sustainability and GHG characteristics aligned with the RED can be verified through recognised certification systems and, in the future, the Union Database.

The continued exclusion of third countries from the UDB, including the UK, has been an issue repeatedly raised by industry representatives and third-country governments. **This is now operating as a direct barrier to the proper functioning of the EU single market.** Its impact is particularly acute and disproportionate for Ireland, due to its unique geographic and infrastructural position, whereby **Ireland's gas interconnections transit through the UK, resulting in an indirect pipeline connection to continental Europe.** As a consequence, Ireland is denied access to compliance and market mechanisms available to other Member States. This creates **unjustified intra-EU trade restrictions and results in discriminatory treatment within the EU internal energy market.**

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<sup>1</sup> [Renewable Heat Obligation](#)

<sup>2</sup> [Notification 2025/786/IE](#)

To preserve the integrity of the EU renewable energy market, it is essential that all countries with physical interconnection to the EU gas grid should have access to the mass balancing system. Cross-border trade of renewable gases between EU countries and third country partners should also keep contributing to our decarbonisation goals. In this context, third countries should also be brought within the scope of the UDB before this tool becomes mandatory.

Even acknowledging the current connection of Ireland with continental Europe as being indirect, in light of the delayed integration of the UK to the UDB, **an interim solution should be foreseen:**

- 1) **Because having a direct connection is not a requirement of the UDB:** According to Articles 2(18), 18(3) and 19(2)(m) of Implementing Regulation 2022/996, consignments injected in an interconnected infrastructure can be subject to the same mass balancing system. The text does not refer to the direct nature of such connection.
- 2) **Because the use of market-based measures for indirectly connected Member States is already recognised for gaseous molecules:** Under the Gas regulation (Regulation 2024/1789), Recital 108 and Article 13a, specific provisions exist for Member States indirectly connected to other EU Member States to provide solidarity for natural gas through market-based measures. Having the possibility to rely on market measures to maintain the unity of the Internal Renewable Energy Market deserves similar particular attention until the UK is being integrated.

**While the integration of the UK and other third countries should be urgently accelerated, ensuring cross-border trade of renewable gases warrants the immediate establishment of interim solution for Ireland.**

