

Question for written answer E-003014/2025
to the Commission
Rule 144
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Subject: Legal risks of EU proposal to ban Russian natural gas imports

According to the Oxford Institute for Energy Studies, the proposal for a regulation on phasing out Russian natural gas imports, improving the monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938 raises unresolved legal issues that ‘place a significant burden on importers and other stakeholders, while risking regulatory overreach [...] thus potentially increasing costs and preventing legitimate gas imports’. The analysts also argue that the amendment of the rules creates legal uncertainty, in particular as regards the application of force majeure clauses and contract termination. The proposal does not guarantee that an import ban will be recognised as a case of force majeure under the relevant contract, leaving buyers exposed to potential claims for compensation or ongoing obligations under long-term Russian gas and LNG contracts, even if the EU ban is in place.

How will the European Commission take account of the criticism of the Oxford Institute for Energy Studies¹ that the proposal to phase out Russian gas imports creates legal uncertainties and exposes importers to possible claims for compensation?

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¹ <https://www.oxfordenergy.org/wpcms/wp-content/uploads/2025/07/The-EU-Proposal-To-Ban-Russian-Gas-Imports-roadblock-more-than-roadmap-NG-199.pdf>