



# **LNG in Europe in 2024:** Overview of the European LNG market, the legal landscape in Europe, and key contractual trends

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**ReedSmith**

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# Scope of report

## This report:

- i. describes the European LNG market in 2024 and considers its possible future direction;
- ii. looks at some of the key contractual trends currently affecting the global LNG market, including the European LNG market;
- iii. provides an overview of key legislation and regulation applicable to LNG activities in the European Union; and
- iv. gives details of Europe's operational large-scale LNG regasification terminals and those under construction.

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# Introduction to the European LNG market

The European LNG market is often described as a single LNG market, and Europe as a single importing region. The full European region is the second largest LNG importer in the world, behind Asia. However, there are several distinct sub-regional LNG markets within Europe, and LNG plays various roles and has different strategic and geo-political importance in different parts of the European continent. Wide variations in seasonal demand and gas storage capacity throughout Europe's LNG importing countries also influence LNG importing patterns across Europe.

Europe's LNG market has experienced major disruptions and fluctuations over the last few years. The COVID-19 pandemic caused a significant drop in demand for LNG in Europe between 2020 and 2022, and LNG prices fell dramatically over this period. The start of the Russia-Ukraine crisis in February 2022 and Europe's ensuing drive to reduce its dependency on Russian natural gas imported by pipeline caused a complete U-turn as Europe sought to rapidly increase its LNG import capacity and European LNG prices reached record highs.

Primarily in response to the situation between Russia and Ukraine, Europe added 30 million tonnes per annum (MTPA) of regasification capacity in 2023 via seven projects comprising a combination of new facilities, expansions, and restarts. Of the seven projects, six are floating storage and regasification units (FSRUs) and one is onshore (the restart of El Musel in Spain). This coincided with a period when the levels of LNG imports into Europe stabilised (remaining at about 121 million tonnes) thereby causing a reduction in overall regasification utilisation rates compared to 2022. Import levels continued to increase in the Netherlands and Germany; however, the major European LNG importing countries of Spain, France, and the UK all experienced reduced levels of LNG imports in 2023.

The United States was the largest supplier of LNG to Europe in 2023 with a direct voyage across the Atlantic Ocean. The location of the LNG import terminal in Europe may influence other sources of LNG supply. Northern European terminals are more likely to receive LNG from Norway and Russia, whereas Europe's southern terminals are more likely to receive LNG from Algeria, Egypt, and Nigeria due to shorter shipping routes.

## Europe's sub-regions

### The main European LNG sub-regions are:

**North-west Europe**, comprising the UK, Northern France, the Netherlands, Belgium, and (most recently) Germany. The north-west European LNG market is highly integrated due to an expansive integrated gas pipeline network for regasified LNG and extensive gas storage, both of which facilitate high liquidity. The Title Transfer Facility (TTF) is now the main price index for the sale of LNG into north-west Europe. Germany became an LNG importer for the first time in 2023 in direct response to the Russia-Ukraine crisis and the need to diversify its energy sources.

**Southern Europe** (sometimes described as Mediterranean Europe), comprising Southern France, Spain, Portugal, Italy, Greece, Malta, and Turkey. The Iberian Peninsula LNG market, comprising Spain and Portugal, enjoys a substantial degree of integration. However, while Spain has the largest regasification capacity in Europe and relatively low levels of utilisation, it remains unconnected to the rest of continental Europe. Southern Europe is otherwise made up of largely distinct and separate markets. Turkey (geographically only partially located in Europe) is also considered to be part of the East Mediterranean LNG hub, along with Egypt and Israel. Cyprus looks set to join the ranks of Mediterranean LNG import countries in late 2024 or early 2025.

**North-east Europe and the Baltic region** (sometimes called the Nordic region), comprising the established markets of Lithuania (Klaipėda), Poland (Świnoujście) and, more recently, Finland (Inkoo). A further terminal is planned in Estonia (Paldiski) although its status is uncertain as Estonia is currently able to meet demand with regasified LNG via Finland and Lithuania. Latvia has abandoned plans to develop an FSRU.



## The outlook for LNG in Europe

There are various schools of thought on the future direction of the European LNG market. There is wide recognition in the industry that LNG demand in Europe is likely to remain resilient, and that LNG will be part of Europe's energy mix for longer than many are willing to recognise. LNG will face challenges from electrification, hydrogen displacement, and other EU and national energy transition initiatives but the recent buoyant levels of commitment to long-term regasification services in Europe's LNG import terminals (including commitments of more than 15 years to significant firm capacity in two onshore terminals in Germany) suggests that LNG is well placed to remain a key component in the European energy mix. There is a wave of new LNG supply coming on stream in the coming years and much of that has already been earmarked for supply to Europe. Some commentators suggest that European LNG peak demand is not in sight yet and that Europe needs even more regasification capacity, while by contrast, others (notably the Institute for Energy Economics and Financial Analysis) believe European LNG demand could peak as early as 2025 and that the continent is overbuilding import capacity.

The complexities and uncertainties of the European LNG market mean that those involved in the European LNG market are necessarily exercising caution (including EU governments and policymakers) when committing to long-term LNG contracts and infrastructure builds. Nonetheless, those commitments are still being made with a number of further (primarily floating) LNG import terminals planned in Europe between now and 2030, and a growing number of parties becoming involved in the European LNG market.

# Current contractual trends in the global and European LNG market

This section gives an overview of contractual trends and patterns that we are seeing in the LNG market. In most cases, they are global trends and not unique to Europe. Our LNG team is available to provide further information and advice about how these trends affect the negotiation of LNG contracts and how they are being addressed. We are at the forefront of evolving best practices in these areas.

## Term of long-term LNG SPAs

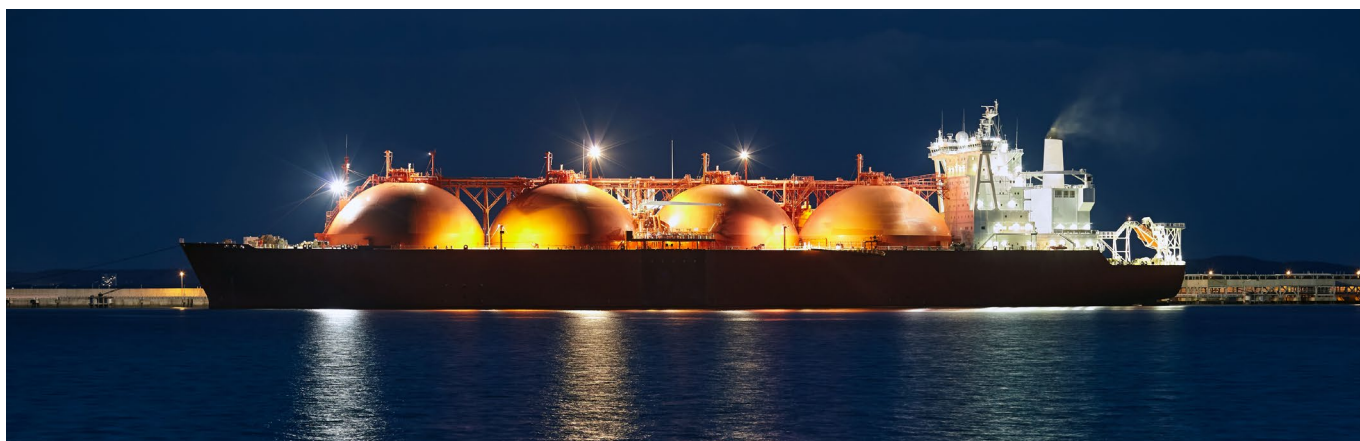
Long-term contracts are still required to underpin the development of almost all large-scale LNG liquefaction and regasification projects, which involve high capital expenditure and, in many cases, some level of limited recourse project financing from external lenders. Very few LNG project developers have the ability and financial resources to sanction LNG projects without long-term contracts. Long-term LNG contracts include liquefaction service/tolling agreements, regasification terminal service agreements and long-term LNG sale and purchase agreements (LNG SPAs). While project developers typically seek to keep their contracts in effect for as long as possible (e.g., more than 20 years) to maximise their rates of return, many LNG buyers currently prefer deals of a shorter tenor. Ten to 15 years is now the norm in long-term LNG SPAs. This is particularly the case in respect of the purchase of LNG with Europe as the intended region for LNG unloading, due to the uncertainties around the longevity of Europe's LNG demand and future regulatory requirements.

## Contractual flexibility

The recent unprecedented events in the global energy market have highlighted the value of contractual flexibility, particularly in long-term LNG contracts, to manage uncertainties effectively over the term of the contract. We are seeing a number of provisions (such as operational tolerances, annual quantity adjustments and destination flexibility) evolving to improve portfolio flexibility.

## Commercial arbitrage

Amid the substantial price swings of the past couple of years, we have seen increasing instances of parties redirecting otherwise seemingly committed volumes of LNG to take advantage of spikes or upward swings on the spot market and then seeking to rely on contractual provisions such as quantity or operational tolerances or liability limitations to excuse or limit their liability. This non-delivery of LNG cargoes has resulted in a number of 'large-scale' disputes in arbitration. Whether the provisions allow for this will depend on their wording



and true interpretation in each case – but many will have been drafted without any real sense that they may one day be used to convert commitments into backdoor option agreements. Within that context, we have also seen increasing focus by parties on the need to define the concept of wilful default (or its equivalents) and the consequences of a wilful default. The conventional cap on liability of 30-50% of the shortfall quantity multiplied by the contract price is often viewed as no longer sufficient where commercial arbitrage is involved, and we are seeing caps being removed entirely.

### Force majeure

Force majeure clauses have come under far greater scrutiny following the COVID-19 pandemic, which led to a sharp increase in force majeure claims as parties sought relief from their contractual obligations. We are seeing more extensive drafting to clarify what is a true force majeure event and what is actually a commercially driven act or omission presented as a force majeure event. Additionally, the landmark recent decision of the UK Supreme Court in “MUR Shipping v RTI Ltd [2024]” provided clarificatory precedence on the meaning and effect of terms requiring the exercise of ‘reasonable endeavours’ in the context of force majeure. The decision has far-reaching implications for trading LNG under MSPAs and long-term supply agreements requiring, in many instances, a ‘rethink’ of current terms and practices relating to supply of LNG.

### Termination

Termination rights have always been limited in long-term LNG contracts to ensure parties stay true to their commitments for the life of the contract. Another consequence of the pandemic was a rise in the incidence of parties seeking ways to terminate contracts that had become economically unfavourable to them. As a result, the importance of making termination provisions in long-term LNG contracts watertight and not vulnerable to capricious termination is a key issue during negotiations.

### Credit support for new entrants

Essentially, the party with the long-term, take-or-pay obligation must be able to meet its payment obligations for the term of the contract. This is easy to evaluate where the party has a strong investment-grade credit rating with the likes of S&P or Moody’s, but the European LNG market has recently seen an influx of new players whose financial status is less secure or clear, including fully or partially state-owned entities across the region. The party receiving the payments will seek robust credit support from its counterparty, but unless the counterparty is sufficiently creditworthy in its own right or has a creditworthy parent that can provide a parent company guarantee, it will typically be required to provide a letter of credit from a reputable international bank (or equivalent instrument), which comes at a cost. In some cases, the LNG buyer is itself a joint venture with its own external financing in place, which complicates the credit analysis.

### Price reviews

Prior to the past couple of years, many would have suggested that with the increasing prevalence of hub indexation in European LNG contracts, price reviews in Europe would die out (with Asia taking over as the more active forum for such reviews and disputes).

What history tells us, however, is that periods of global volatility (such as the economic crisis in 2008) may lead to a wave of price review activity. Despite the increasing prevalence of hub indexation, many contracts delivering into Europe remain fully or partially linked to oil prices. Moreover, even where contracts are indexed to TTF, it is by no means a given that TTF will remain a price signal for market prices in each buyer market in Europe. More importantly, the overall increase in imports of LNG to Europe, coupled with the increase in supply from the United States in particular (with contracts typically linked to the Henry Hub and allowing for greater destination and other flexibilities for buyers than offered by more established suppliers to Europe), seem poised to generate a new wave of price review activity, particularly under longer-standing and potentially less flexible

contracts. We are already seeing signs that this potential may prove the reality. In addition, though perhaps less immediate, Europe's climate goals and existing and future initiatives arising from them also seem likely to generate activity in the price review arena if the provisions of the LNG SPA allow.

### Future-proofing

It is impossible to provide for every potential eventuality that might impact the LNG market over the life of the long-term LNG contract, but it is realistic to expect that the need to meet net zero goals will result in even more regulation that will put new performance or payment obligations on the parties to the contract. As discussed in section 3 of this report, the EU regulatory framework in relation to reducing GHG emissions is constantly expanding. As a result, we are seeing traditional tax and other fiscal provisions extended to allocate responsibility for future 'clean energy' costs, such as emissions charges, and change in law provisions now often specifically address 'clean energy' and how it should be dealt with by the parties. Furthermore, European LNG buyers (and increasingly Asian and other buyers) are demanding that LNG SPAs provide a clear understanding of the carbon intensity of the LNG they are buying, which has resulted in detailed provisions in LNG SPAs regarding the measurement, recording, and verification of emissions associated with LNG cargoes.



# Overview of LNG legal and regulatory framework in Europe and sanctions

Laws and regulations that apply to LNG activities in Europe may be created (and imposed) at an international, supranational (e.g., EU), national, or regional level. This section of our report gives a high-level review of the key EU laws and regulations that apply to LNG-related activities conducted in the EU, or outside the EU where the LNG is ultimately destined for the EU. It does not address how EU policy has been enacted into the national laws of each of the EU's 27 member states, and this would need to be considered on an individual member state basis.

For more information about any of the regulations described in this section please contact Reed Smith's experienced LNG regulatory team.

## Sanctions on Russian LNG

The first EU sanctions on Russian LNG were approved on 24 June 2024 as part of the EU's fourteenth package of sanctions against Russia. The 27 EU member states have not all been aligned on measures towards Russia in respect of natural gas and LNG, largely due to the differing levels of dependency on Russian gas and LNG for energy security across member states, and the different geopolitical relationships between Russia and individual member states.

The sanctions on Russian LNG are intended to prevent Russian LNG that will not be consumed in the EU's energy market from being reloaded in the EU, thereby preventing LNG from being sold to third countries via EU ports. Essentially, Russian LNG imported into the EU cannot be reexported and must be used to meet the EU's energy demands. The sanctions prohibit (i) transshipment of Russian LNG at EU ports and LNG import terminals in the EU; (ii) the reloading of Russian LNG at LNG import terminals in the EU; and (iii) the unloading of Russian LNG at LNG import terminals in the EU that are not connected to a gas grid for the send-out of regasified LNG.

The sanctions are effective immediately for any new activities covered by the prohibitions and will be phased in for particular types of existing service contracts to give the affected parties time to unwind their contracts and reschedule services prohibited by the sanctions. They apply to any party engaged in the prohibited activities, regardless of nationality or place of business.

The sanctions are important as the first measure taken by the EU in relation to Russian LNG. However, in terms of the economic impact on the Russian LNG market and the levels of Russian LNG imported into the EU, the impact is unlikely to be significant.

For more information on the sanctions on Russian LNG please click [here](#).

For more information of the EU's fourteenth package of sanctions please click [here](#).



## Regulation of LNG supply, trading, and marketing

**ACER:** The EU Agency for the Cooperation of Energy Regulators (**ACER**) was established in March 2011 to foster cooperation among the EU's energy national regulatory authorities (**NRA**s) and help ensure that a single European market for electricity and natural gas (including LNG), functions well. ACER is a decentralised EU agency responsible for ensuring compliance with the EU's regulations relating to LNG supply, trading, and marketing.

**REMIT and REMIT 2:** EU Regulation 1227/2011 on wholesale energy market integrity and transparency (**REMIT**), entered into force on 28 December 2011. Its purpose is (i) to support open and fair competition in the European wholesale energy markets; and (ii) to prevent insider trading and market manipulation. It applies to contracts for the supply or transportation of LNG and LNG derivatives delivered to or traded in the EU. The main obligations under REMIT are: (i) an obligation to publish inside information, such as information relating to the capacity or use of LNG facilities; (ii) a prohibition on insider trading; (iii) prohibitions on manipulation and

attempted manipulation of wholesale energy markets (being any organised or physical markets on which LNG is traded) and includes markets for physical forward contracts and non-standardised long-term contracts; (iv) an obligation on market participants entering into a reportable transaction to register with the relevant NRA; (v) trade reporting obligations; (vi) an obligation to report a suspected breach of the prohibitions on insider trading or market manipulation; and (vii) an obligation to establish and maintain effective arrangements and procedures to identify breaches of these prohibitions. Upon the UK's departure from the EU, EU law ceased to apply in the UK; however, the UK retained REMIT under domestic law.

Regulation 2024/1106, amending REMIT, and the regulation establishing ACER (**REMIT 2**) entered into force on 7 May 2024. REMIT 2 updates and amends the REMIT framework with the aim of: (i) better alignment with financial markets laws such as the Market Abuse Regulation (596/2014/EU) (**MAR**); and (ii) taking account of various market developments in wholesale energy markets, such as increased algorithmic trading.



### The most relevant changes under REMIT 2 for LNG are:

- i. From 1 January 2025, the obligation for ‘LNG market participants’ to provide ACER with ‘LNG market data’ daily will become permanent. It was previously due to expire at the end of 2024.
- ii. A market participant from a third country is required by 8 November 2024 to designate a representative physically located in an EU member state in which the market participant is active in the wholesale energy market.
- iii. The scope of ACER’s decision-making powers is expanded to include on-site inspections, requests for information, and authorisations or withdrawal of authorisations of so-called ‘inside information platforms’ and registered reporting mechanisms. In addition, ACER will have the power to impose periodic penalty payments to ensure compliance with on-site inspection decisions and requests for information.
- iv. ACER will have the right to investigate cases with a cross-border dimension, involving at least two member states.

### Derivatives and financial markets regulation

Spot and forward contracts for the physical delivery of LNG into the EU generally will not constitute any kind of derivatives contract under EU law. However, LNG buyers and sellers may seek to hedge commodity price risks arising from their purchases or sales of LNG by entering derivatives contracts. Under EU law, commodity (including LNG) derivatives are subject to a comprehensive set of regulations, including: (i) the European Market Infrastructure Regulation (**EMIR**), which sets out requirements relating to the use of risk mitigation techniques for uncleared derivatives; (ii) MAR, which establishes an insider trading and market manipulation regime governing financial instruments; and (iii) the Second Markets in Financial Instruments Directive (**MiFID 2**), which, among other things, requires EU member states to make the practising of investment services and activities relating to financial instruments as a regular occupation or business subject to an authorisation requirement. In the United Kingdom, EMIR and MAR form part of retained EU law.



## Environmental and climate control regulation

### The key EU regulations relating to environmental compliance and emissions reduction are:

**EU ETS:** The EU Emissions Trading System (**EU ETS**) was introduced in 2005. It has been extended to apply to emissions (carbon dioxide (CO<sub>2</sub>) from 1 January 2024 and, from 1 January 2026, methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O)) from marine vessels of 5,000 gross tonnes or more, which would include oceangoing LNG vessels transporting LNG to an EU port. Businesses that are required to participate in the EU ETS must acquire sufficient EU emissions allowances to match their annual emissions of specified GHG gases. Consequently, the LNG shipowner (or other person to whom responsibility has been transferred), will be obliged to acquire and surrender emissions allowances in respect of the vessel's emissions when in transit between EU ports, during international voyages to and from EU ports, or while located in berth at an EU port. From 1 January 2024, the EU ETS applies to (i) 50% of CO<sub>2</sub> emissions from vessels of 5,000 gross tonnes or more (a category that includes oceangoing LNG carriers) on voyages starting in or ending outside of the EU; and (ii) 100% of CO<sub>2</sub> emissions when the LNG vessel is proceeding between two EU ports and when it is within an EU port.

An entity that the EU calls the 'shipping company' is responsible for compliance with the EU ETS. In brief, the 'shipping company' is the entity responsible for the voyage. Under a delivered ex-ship LNG sale contract, it would seem logical that liability for EU ETS compliance will lie with the LNG seller because, as the owner or charterer of the LNG vessel in question, it is more likely to be either the shipping company under the EU ETS or a charterer responsible for the costs of compliance. By contrast, in a free-on-board sale, it is more likely that, as between the LNG seller and the LNG buyer, the LNG buyer will be liable for the cost of compliance with the EU ETS for the same reason.

**CBAM:** The purpose of the Carbon Border Adjustment Mechanism (**CBAM**) is to ensure that the emissions reduction efforts of the EU are not offset by 'emissions leakage' from the import of carbon-intensive products

from outside the EU. In essence, CBAM is a measure to ensure that specific imported goods pay a price for their carbon emissions that is comparable to the price paid by EU domestic producers under the EU ETS. At the time of writing (July 2024), CBAM does not apply to the import of LNG. It is expected that CBAM may be extended to apply to LNG imports into the EU by 2030.

**EU Methane Regulation:** The [EU Methane Regulation](#) came into force on 4 August 2024. Under the regulation, LNG importers to the EU will be required to ensure producers/ exporters implement monitoring, reporting, and verification (**MRV**) measures from 2027 to ensure that the LNG importers will be in a position to comply with methane reporting obligations and then in turn demonstrate compliance with methane intensity limits, which will be set before 2030. From 1 January 2027, LNG importers will need to show that all contracts signed or renewed after 4 August 2024 which provide for the import of LNG into the EU comply with MRV procedures which are equivalent to the MRV procedures applicable to EU producers and operators. For contracts that were concluded before the implementation of the EU Methane Regulation, importers will be expected to undertake all reasonable efforts to secure cooperation on the part of their suppliers (LNG exporters) with the MRV requirements of the regulation.

## Key EU competition legislation

There is a body of EU competition legislation that may be applicable to prevent anti-competitive practices in the LNG sector, and to ensure fair and equal terms of access to LNG facilities in the EU. Consideration should also be given to general EU competition law rules set-out in articles 101 and 102 of the Treaty on the Functioning of the EU (TFEU), which may be relevant in some circumstances. The key areas affecting LNG facilities in the EU are:

**Third-party access:** Under the EU's Third Gas Directive owners/operators of LNG facilities in the EU must provide fair and open access to all 'system users'. The obligation requires them to provide access to third parties on a non-discriminatory and transparent basis, applying published charges that have previously been approved

by the relevant NRA. Article 36 of the Third Gas Directive allows 'system operators' to get an exemption (either full or partial) from regulated third-party access for 'major new infrastructure' where the following conditions are met: (i) the facility will enhance competition in gas supply and enhance security of supply; (ii) the investment would not occur without an exemption due to the levels of risk involved; (iii) the infrastructure must be owned by a natural or legal person that is separate, at least in terms of its legal form, from the system operators of the gas network to which it is linked; (iv) charges for use are levied by the owner; and (v) the exemption is not detrimental to competition, the internal gas market, or the transmission system to which it is connected. The NRA grants the exemption, and it is then submitted to the EU Commission for approval or amendment. Exemptions, when granted, are for a defined period proportionate to the level of investment. The exemption period starts when the terminal comes into commercial operation. Where granted, an exemption allows the owner or operator to bilaterally negotiate the terms of access to the terminal services. It is a condition to the grant of an exemption that the terminal operates an effective use-it-or-lose-it regime to prevent terminal users hoarding capacity and therefore distorting competition.

Prior to the Russia-Ukraine crisis, exemptions had been granted in respect of the following operating LNG terminals in Europe: the three terminals in the UK (not in EU), the Gate terminal in the Netherlands, the Dunkerque terminal in France, the Alexandroupolis terminal in Greece, and the Livorno/Toscana and Rovigo terminals in Italy. Exemptions were also granted for the two onshore LNG projects under development in Germany at Brunsbüttel and Stade. Partly to ensure that additional LNG was brought to EU markets as quickly as possible following the start of the Russia-Ukraine crisis, exemptions have been granted for a number of the recent FSRUs, including Eemshaven in the Netherlands, and two of the (temporary) FSRUs in Germany at Brunsbüttel and Stade. An exemption was also granted in relation to the expansion of the Gate terminal in the Netherlands.

**Open season:** Prior to allocating regasification and storage capacity at LNG terminals in the EU (both regulated and exempt), the owner/operator is required to conduct an open season process to ensure that capacity is allocated in a non-discriminatory manner. The relevant NRA has the power to ensure that EU anti-competition laws that are given force of law under domestic laws are observed when capacity is allocated. The open season is often organised in three phases: qualification of the applicant, non-binding application, and binding application. Generally, open season procedures consist of a two-step process: (i) an open assessment of market demand for a specific proposal; and (ii) a subsequent phase of capacity allocation. The owner/operator is obliged to publish the open season procedures on its website.

**State aid:** The substantive EU state aid provisions are set out in articles 107 and 108 of the TFEU. In summary, 'state aid' (which covers a wide range of financial and economic assistance by government entities to commercial parties, such as grants, guarantees, or subsidies) is unlawful under EU law if it is not disclosed to the European Commission and deemed compatible with the rules on a common market. In some circumstances, the European Commission will allow state aid within defined parameters, where the benefits to society outweigh the possible distortions of competition. In the context of the LNG sector, this is generally where the investment in LNG (i) will benefit the security of gas supply to countries that have been over-reliant on Russian pipeline gas; and (ii) is compatible with the EU's 2030 and 2050 climate goals. Some state aid has been allowed for LNG import terminals in Lithuania (Klaipėda), Croatia (Krk Island), Greece (Alexandroupolis) and Germany (Brunsbüttel).

# Europe's LNG terminals operating or under construction in August 2024

At the time of writing in August 2024, there are 36 large-scale LNG terminals in Europe (EU and non-EU) in operation. Several other terminals are under construction or planned. Of the existing operational large-scale LNG import terminals in Europe, 20 are located onshore and 16 are FSRUs. Large-scale LNG terminals are terminals that can receive and unload large LNG vessels and regasify LNG for distribution into a connected natural gas pipeline network. The table below lists the large-scale LNG terminals that are either in operation or under construction in Europe in July 2024. Small-scale terminals are not listed.

Country	Net LNG imports in 2023 (MT)	Terminal <sup>1</sup>	Onshore or FSRU	Regulated third-party access (TPA) or exempt <sup>2,3</sup>	Key recent facts or events
Belgium	8.3	Zeebrugge	Onshore	Regulated TPA	Send-out capacity increased by 4.7 MTPA to 11.3 MTPA in January 2024. A further 1.3 MTPA of additional send-out capacity is planned to be available by January 2026. Its capacity was fully utilised in 2023
Croatia	2	Krk Island	FSRU	Regulated TPA	Expansion from 1.9 MTPA to 4.5 MTPA is expected to be complete in October 2025. Part of the expansion capacity is already complete
Cyprus	N/A	Vasilikos	FSRU	Regulated TPA	A converted FSRU was delivered in January 2024 and is due to be complete and operational by the end of 2024 (although further delays are likely)
Finland	1.4	Inkoo	FSRU	Regulated TPA	First large-scale FSRU in Finland entered service in early 2023

1. For information about what services are provided at each of these terminals, please refer to Gas LNG Europe's (GLE) List of Services at <https://www.gie.eu/transparency/databases/lng-list-of-services/>

2. The distinction between regulated and exempt terminals is described in Section 3 (Third-party access)

3. The European Commission publishes all exemption decisions at [https://energy.ec.europa.eu/topics/markets-and-consumers/wholesale-energy-market/access-infrastructure-exemptions-and-derogations\\_en](https://energy.ec.europa.eu/topics/markets-and-consumers/wholesale-energy-market/access-infrastructure-exemptions-and-derogations_en)

Country	Net LNG imports in 2023 (MT)	Terminal	Onshore or FSRU	Regulated third-party access (TPA) or exempt	Key recent facts or events
France	21.8	Dunkerque	Onshore	100% exemption for 20 years	Second largest terminal in continental Europe Connected to French and Belgium gas pipeline networks
		Montoir-de-Bretagne	Onshore	Regulated TPA	Montoir-de-Bretagne, Fos Tonkin, and Fos Cavaou are all operated by Elengy  The Fos Tonkin and Fos Cavaou LNG terminals are located on the Mediterranean coast, while the Montoir-de-Bretagne facility is located on the Atlantic coast  All three terminals have offered short-term additional regasification capacity between October 2023 and December 2025 under EU open access rules  Send-out ceased in 2024 for maintenance. Elengy expects to resume operations in August 2025
		Fos Tonkin	Onshore	Regulated TPA	Earlier in 2024, send-out from Elengy's Fos Tonkin and Fos Cavaou LNG import terminals was reduced due to a strike by Elengy's workers over pay
		Fos Cavaou	Onshore	Regulated TPA	Located at the crossroad of European and Mediterranean LNG market. The terminal was expanded in 2023
		Le Havre	FSRU	50% exemption for 5 years 50% regulated TPA	France's first FSRU, which came into operation in 2023. The FSRU is chartered by Total Energies
Germany	5.1	Wilhelmshaven	FSRU	Understood to have some exemption. Details unknown	Germany's first FSRU commissioned in late 2022. A second FSRU has recently been commissioned at Wilhelmshaven
		Lubmin	FSRU	Regulated TPA	Germany's second FSRU. It was commissioned in January 2023
		Brunsbüttel/Elbehafen	FSRU	Exemption for 13.3 billion cubic metres per annum ( <b>bcma</b> ) for 25 years	Germany's third FSRU to come into operation in May 2023. It will be replaced by the onshore terminal at Brunsbüttel, which is expected to come into operation in 2026

Country	Net LNG imports in 2023 (MT)	Terminal	Onshore or FSRU	Regulated third-party access (TPA) or exempt	Key recent facts or events
<b>Germany</b>	5.1	Mukran/ Deutsche Ostsee	FSRU	Regulated TPA	Commissioned in February 2024 with one FSRU with capacity of 9.9 MTPA. A second FSRU will arrive at Mukran in late 2024 as phase 2 of the project
		Stade	FSRU	Understood to have some exemption. Details unknown	An FSRU arrived at Stade in March 2024. It will be replaced when the on-shore LNG terminal at Stade comes into operation
		Stade	Onshore	90% exemption for 25 years 10% regulated TPA	Final investment decision taken to develop the project in March 2024. It is expected to be operational in 2026/7. The LNG terminal will have a total capacity of 13.3 bcma.  EnBW, SEFE, and CEZ have booked the 90% exempt capacity on a long-term basis
		Brunsbüttel/ Elbehafen	Onshore	90% exemption for 25 years 10% regulated TPA	Due to become operational as a 10 bcma terminal in 2026. The project received €40 million in state aid. ConocoPhillips, RWE and Ineos have booked the 90% exempt capacity on a long-term basis. The 10% regulated capacity will be offered annually under auction rules
<b>Greece</b>	2.1	Revithoussa	Onshore	Exempt	The addition of a floating storage unit (FSU) to increase the terminal's storage is proposed
		Alexandroupolis	FSRU	Exempt	Commissioned in February 2024. It will deliver regasified LNG to Greece, Bulgaria, Romania, North Macedonia, Serbia, Moldova, Ukraine, Hungary, and Slovakia
<b>Italy</b>	11.8	Adriatic/Rovigo	Onshore	Exempt	Onshore terminal on artificial island
		Panigaglia/La Spezia	Onshore	Regulated TPA	The terminal is currently undergoing a plant modernisation programme
		Livorno/Toscana	FSRU	Exempt	Undergoing maintenance that is due to be completed by end of October 2024
		Piombino/FSRU Italia	FSRU	Regulated TPA	FSRU started commercial operations in July 2023
		Ravenna	FSRU	Regulated TPA	A further FSRU is undergoing works that are expected to be completed by the end of 2024
<b>Lithuania</b>	2.1	Klaipėda	FSRU	Regulated TPA	Currently in dry dock (July 2024) – it will resume operations imminently. The Operator – Energies - has exercised the option to purchase FSRU Independence

## SECTION 4

Country	Net LNG imports in 2023 (MT)	Terminal	Onshore or FSRU	Regulated third-party access (TPA) or exempt	Key recent facts or events
<b>Netherlands</b>	16.3	Gate terminal	Onshore	100% exemption for initial capacity for 20 years. A further new exemption has been granted for the terminal's expansion capacity	Being expanded by addition of 4th storage tank. Has allocated firm capacity beyond 2031. 93% utilisation rate in 2023
		Eemshaven	FSRU	100% exemption for 6 years	Came into operation in September 2022 and imported its 100th cargo on 11 June 2024
<b>Poland</b>	4.6	Świnoujście	Onshore	Regulated TPA	Stage 2 of the expansion project is ongoing and scheduled for completion in 2024. It received its 300th cargo in July 2024
		Gdansk	FSRU	Regulated TPA	New FSRU LNG terminal is under development and due to be operational in 2027/8
<b>Spain</b>	16.8	Bilbao	Onshore	Regulated TPA	High levels of reloads across Spain's 7 operating terminals in 2023. Relatively low levels of utilisation in 2023
		Barcelona	Onshore	Regulated TPA	
		Cartegena	Onshore	Regulated TPA	
		Huelva	Onshore	Regulated TPA	
		El Musel	Onshore	Regulated TPA	Reactivated in 2023 after almost 10 years of being mothballed
		Mugaros	Onshore	Regulated TPA	
		Sagunto	Onshore	Regulated TPA	
<b>Turkey (not EU)</b>	10.1	Gulf of Saros	FSRU	N/A	New FSRU started operations in April 2023
		Marmara Ereğlisi	Onshore	N/A	Turkey's first LNG terminal and the only one in Turkey capable of conducting reexports
		Aliaga Egegaz	Onshore	N/A	Turkey's second regasification terminal started operations in 2006
		Izmir	FSRU	N/A	Turkey's first FSRU – inaugurated in 2017
		Hatay	FSRU	N/A	Turkey's second FSRU, which has been in operation since 2018
<b>UK (not EU)<sup>4</sup></b>	14.5	Isle of Grain	Onshore	Exempt	Undergoing an expansion that will increase its capacity to 23 MTPA from July 2025
		South Hook	Onshore	Exempt	In 2023, QatarEnergy delivered the 1000th shipment to the terminal
		Dragon	Onshore	Exempt	Capacity available from 2029

4. The UK officially left the EU at 11.00 pm on 31 January 2020



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