ACER

European Union Agency for the Cooperation of Energy Regulators

ACER report on Russian gas import contracts and diversification

Pursuant to Article 7(6) of Regulation (EU) 2026/261

1 July 2026

Executive Summary

Regulation (EU) 2026/261[1], adopted on 26 January 2026, establishes a phased prohibition on imports of Russian gas into the European Union from 18 March 2026, while exceptionally allowing imports under pre-existing authorised contracts during a transitional period. Two milestones of this transition are that imports under short-term contracts concluded before 17 June 2025 remain temporarily permitted until 25 April 2026 for LNG and until 17 June 2026 for pipeline gas. In turn, long-term contracts are given a longer transition period and are allowed to continue until 31 December 2026 for LNG and until 30 September 2027 for pipeline gas.

Article 7(6) of the Regulation mandates ACER to publish two reports: one by 1 July 2026 and a second one by 1 July 2027. Both reports shall focus to provide an overview of the contracts for the supply of natural gas originating in, or exported directly or indirectly from, the Russian Federation that remain authorised during this transitional period, share data on Russian gas transits across the EU where relevant and finally, assess the impact of the Russian gas phase-out on European energy markets. This first report covers the period from 1 January 2026 until 31 May 2026, broken up into two parts: a short period before and after the implementation of the ban on 18 March 2026. This report's key findings are:

- Authorised contracts for Russian LNG and pipeline gas represent a total annual capacity of 45 to 55 bcm.[2] LNG authorised contracts for deliveries into the EU account for 20 to 32 bcm, entering the EU at the external borders of four Member States: Spain, France, Belgium and the Netherlands. In turn, long-term contracts for Russian pipeline gas remain authorised in Hungary, Slovakia and Greece. In total, these pipeline annual contracted volumes range from 16 to 26 bcm. The extent to which this contractual capacity translates into actual imports will ultimately depend on commercial decisions and market conditions.

- Russian gas imports into the EU remain confined within these contractual commitments and roughly represent 12% of the EU gas demand until the end of May 2026.

- Russian gas imported under these contracts is not necessarily consumed in the Member States where the contracts are authorised and/or delivered. Within the integrated EU gas market, gas can be traded at hubs, transported across EU's internal borders and ultimately serve consumers in other Member States, without being easily traceable in terms of final offtake. Under that lens, while reliance on Russian gas typically remains higher in the Member States that act as direct importers – and whereas some countries have already undertaken firm and more rapid efforts to phase out Russian imports –, reducing fully the dependence on Russian gas requires a coordinated European effort to be discussed across Member States, not least to unlock new sources of gas and solve any infrastructure bottlenecks securing the diversification of the landlocked countries.

- Russian gas supplies into the EU continued to rise during the first months of 2026 compared with the same period in 2025. Between January and May 2026, Russian pipeline imports rose by 7% year-on-year, while Russian LNG imports increased by 11%. As from 18 March 2026, Russian pipeline imports have increased by 5% year-on-year and Russian LNG imports also have continued to rise (+17% year-on-year from 18 March 2026 to end May 2026, despite a ban on short-term LNG imports applies since April 2026). The rise likely reflects frontloaded deliveries and adjustments to contractual arrangements ahead of the upcoming tighter restrictions. The geopolitical context is deemed also relevant, pointing to efforts to maximise supply from alternative sources following the closure of the Strait of Hormuz. Finally, the ban on transhipments of Russian LNG via the EU to other destinations also seems to have

[1] Regulation (EU) 2026/261 on phasing out Russian natural gas imports and preparing the phase-out of Russian oil imports, improving monitoring of potential energy dependencies.

[2] This range is presented in a generalized form for rounding purposes and therefore does not exactly correspond to the contract ranges shown in Table 2 by delivery point at Member State, nor to the sum of the corresponding lower and upper volume ranges for LNG and pipeline gas presented in the text. Overall, contract ranges have been determined independently to maximise the analytical value of the published information while preserving contractual confidentiality.

contributed as part of the Russian LNG that was previously transhipped at selected EU ports, until 27 March 2025, may have remained within the EU market.

- The data available suggests that it remains too early to conclude on the impacts of Russian ban as foreseen by the Regulation. It is noteworthy that, while limited in overall volumes, gas flows entering via Türkiye through the Strandzha 1 route were significantly lower since 18 March 2026 (-65% year-on-year, from 18 March to end May 2026), as non-prior-authorised Russian gas cannot enter the EU anymore. More significant impacts are expected from 1 January 2027, when all Russian LNG imports will be prohibited, and from 30 September 2027, when Russian gas pipeline imports are equally due to cease.

For its first report, ACER chiefly but not exclusively relies on contracts reported and collected under the reporting and information exchange mechanisms set out in the Regulation. To assess the impact of the gas phase-out, ACER combines the data collected under the Regulation[3] and the analytics based on its own metrics and datasets. As mentioned before, the data analysis covers the period from 1 January 2026 until 31 May 2026 and is broken up into two parts (a short period before and after the introduction of the ban) and uses the latest available data received and processed.

This report also introduces the proposed methodology to assess the effects of phase-out, an aspect where next year's report will add greater value given a longer assessment period. ACER suggests a methodology that builds on five analytical dimensions to describe market developments related to: supply, flows and infrastructure, prices, demand, and underground gas storages. In this report only selective analyses are presented across these dimensions, covering mainly flows and prices, since no significant year-on-year effects have been identified since the entry into force of the Regulation and the ban it imposes. In addition, the direct impact of the phase-out cannot be easily isolated from disruptions as the closure of the Strait of Hormuz affecting global and European energy and LNG markets. Nonetheless, in combination with geopolitical circumstances, the emerging gas market trends warrant continued monitoring, including price differentials, the potential risk of higher prices in the Eastern part of the EU (at this point not yet observed), developments in storage injections, eventual changes in infrastructure capacity use and possible congestion along alternative supply routes (not yet observed).

Finally, the data presented in this report, in particular data shown in Chapter 2 on Russian gas supply contracts and imports, reflect the information that the Agency has received as of 26 June 2026. The Agency will build on this dataset and data updates for its second report of 1 July 2027.

[3] Under the Regulation (EU) 2026/261, companies importing Russian gas into the EU must demonstrate to the customs authorities of the relevant Member State that they have obtained prior authorisation for their import contracts before gas imports can be accepted. ACER uses the information reported by the authorising authorities to offer an overview of the Russian gas import contracts during the transitional period and complements it with the information received from customs authorities, centralised via DG TAXUD, to monitor the actual imported volumes, backed by authorised import contracts. Customs data currently available to ACER is limited to the aggregated customs information from January to April 2026.

Introduction

The Regulation: objective and key milestones

1 Regulation (EU) 2026/261 of the European Parliament and of the Council of 26 January 2026 on phasing out Russian natural gas imports and preparing the phase-out of Russian oil imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938 (the 'REPowerEU Gas Regulation') establishes a stepwise and complete phase-out of Russian gas supplies into the European Union.

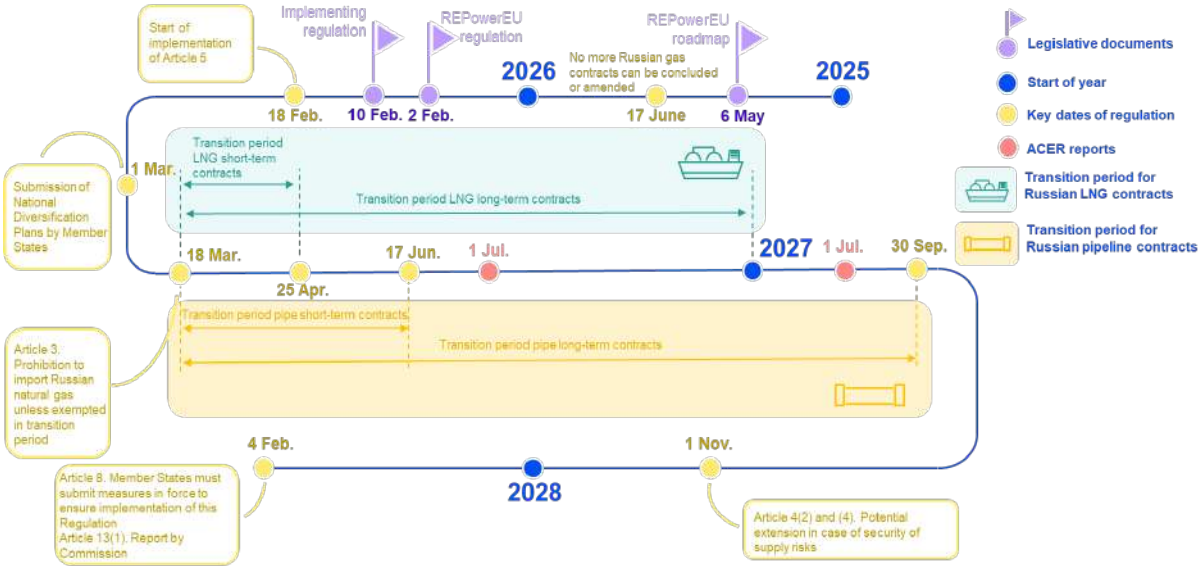
2 The Regulation, which also has an accompanying guidance[4], bans the import of Russian gas both via pipelines and via LNG as outlined in Article 3 which applies, in principle, from 18 March 2026. Article 4 of the Regulation foresees a timeline for the gradual phase-out of Russian gas supplies to the European Union, as follows:

- *For short-term supply contracts concluded before 17 June 2025*, i.e. those with a duration of less than 1 year: a ban on the import of LNG as of 25 April 2026 and for contracts relying on the import via pipelines as of 17 June 2026;

- *For long-term supply contracts concluded before 17 June 2025*: A ban for LNG imports as of 1 January 2027, and for the imports of gas via pipelines as of 30 September 2027. The Commission may exceptionally grant[5] a temporary exemption for pipeline imports under long-term contracts with a final cut-off date of 1 November 2027.

3 Figure 1 gives an overview of the main dates of the phase-out as established by the Regulation.

Figure 1: Timeline of the implementation plan to phase out Russian pipeline gas and LNG.



Source: ACER based on the Regulation.

[4] Guidance on the implementation of Regulation (EU) 2026/261.

[5] Article 4(2) of Regulation (EU) 2026/261. "Where the Commission identifies a risk that a Member State might not meet the filling target for 2027 for underground storage pursuant to Article 6a of Regulation (EU) 2017/1938, taking into account the circumstances of the risk of missing the target, it shall confirm that risk by way of an implementing decision no later than 15 September 2027."

ACER mandate and report structure

4 Article 7(6) mandates ACER to publish two reports focusing on the natural gas ban, respectively by 1 July 2026 and 1 July 2027. Based on this mandate ACER will provide:

a) An overview of contracts for the supply of natural gas that originates in or is exported, directly or indirectly, from the Russian Federation to the European Union;
b) Data on natural gas that originates in or is exported, directly or indirectly, from the Russian Federation entering the Union under a transit procedure as referred to in Article 5(10)[6];
c) An assessment of the impact of diversification on EU energy markets.

5 This first report is structured as follows:

I. **Chapter 1** outlines the evolution of Russian gas imports between 2021 and 2025, providing context for recent EU gas market shifts following Russia's invasion of Ukraine.

II. **Chapter 2** provides an overview of the contracts authorised during the transitional period. Complementarily, the report looks at the Russian gas transit across the EU territory.

III. **Chapter 3** assesses market impacts of the phase-out, at this stage limited, using a set of market metrics to compare results across pre- and post-ban periods. This chapter provides a preliminary analysis, which will be repeated in 2027 when longer datasets will be available.

Data basis

6 Being tasked to provide an overview of Russian gas supply contracts, ACER has notably processed datasets received by the European Commission's Directorate-General for Energy, data from national authorising and custom authorities, obtained via European Commission Directorate-General for Taxation and Customs Union (DG TAXUD[7]), building on the cooperation and information exchange foreseen by the Regulation. In this context the Agency explored bilateral exchanges with national authorising and customs authorities to deepen its understanding of certain inputs.

7 ACER also extracted information in its own possession, in practice pertaining to the ACER LNG price benchmark database for LNG imports and REMIT[8] data for price developments.

8 Beyond own data sources, the Agency leveraged external data sources such as ENTSOG's Transparency Platform (for gas flows and capacity utilisation), the GIE LNG and storage databases, ICIS LNG Edge as well as data from hub operators and market intelligence providers. These sources were mainly used for assessing possible market impacts of the Russian gas supply phase-out.

9 ACER leveraged existing metrics from its Gas Wholesale Monitoring reports to conduct market impact analysis, complemented by additional indicators suitable to measure the impact of the phase-out.

[6] Article 5(10) outlines the transit procedure under which authorising authorities, and where applicable, customs authorities shall follow where natural gas is transported through the Union from third country to third country.

[7] The Regulation further foresees that importers of Russian gas into the European Union must submit detailed contractual information to these authorities to obtain authorisation to import Russian gas.

[8] The REMIT data used may not be fully complete, and the analyses and information connected to REMIT data shall be considered with the necessary caveats.

1. Evolution of Russian gas imports into the EU between 2021 and 2025

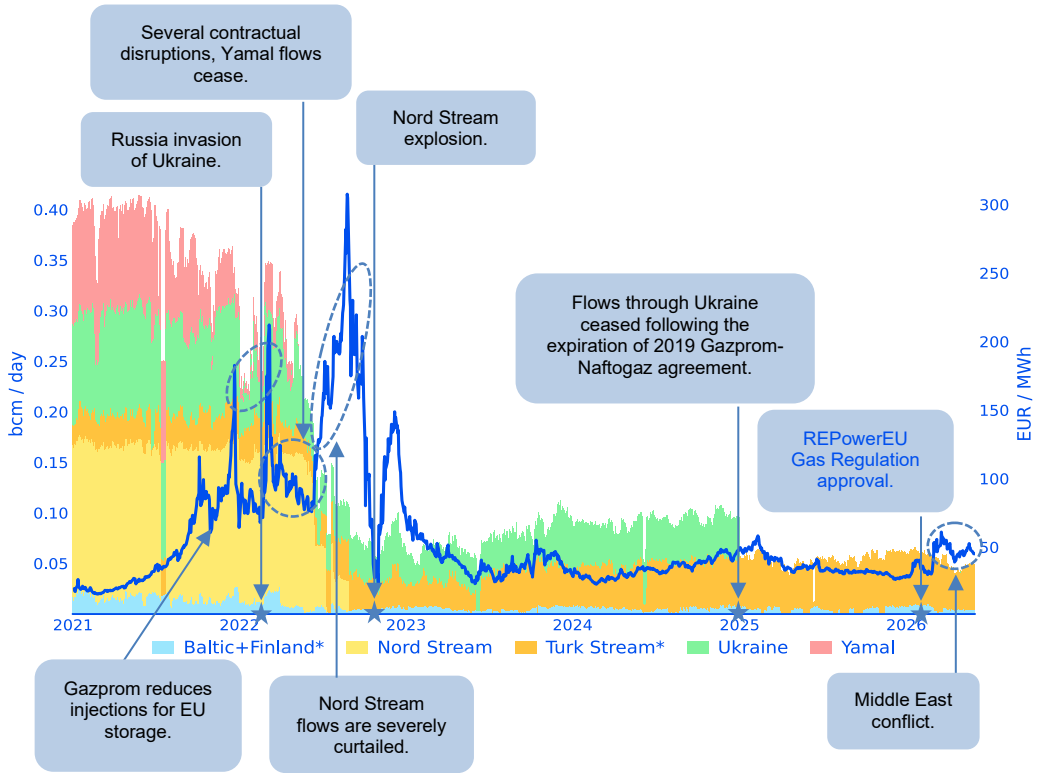
1.1 Crisis response and structural gas market transition

10 As the main historic gas supplier to the EU, Russia relied on an extensive pipeline infrastructure, large gas reserves[9] and long-term pipeline contracts signed between European buyers and the state-controlled Russian company Gazprom.

11 This longstanding commercial relationship gradually broke down starting with the halting of direct Russian gas spot sales in summer 2021, Gazprom's delays to refill sizeable EU gas storages for the winter of 2021/22 and, following Russia's invasion of Ukraine in February 2022, followed by the termination of several gas contracts between Gazprom and its European buyers.

12 Following the invasion, Russian gas deliveries to Europe declined sharply. The decline to the extent possible was managed by coordinated EU measures aimed at reducing dependence on Russian energy, which led to replace lower import volumes and contract cancellations, as well as ensure resiliency following Russian retaliatory actions against EU buyers and disruptions to energy infrastructure. ACER 2023 European Gas Market monitoring report offers a detailed reconstruction of the timeline highlighting how supply volumes were affected between January 2021 and December 2023.

Figure 2: Overview of aggregated pipeline Russian gas supply into Europe (bcm/day) and evolution of TTF Day-ahead hub prices, January 2021 – May 2026 (EUR/MWh).



Source: ACER based on REMIT and ENTSOG Transparency Platform.

Note: The quantities for the Baltic region plus Finland and TurkStream include volumes for third countries. In the case of the Baltic region plus Finland, the entry volumes are all destinated to Kaliningrad (via Lithuania) since 2022.

[9] Russia holds the world's largest proven natural gas reserves (circa. 20% of global share) and is the second-largest gas producer globally, with its production predominantly located in Western Siberia.

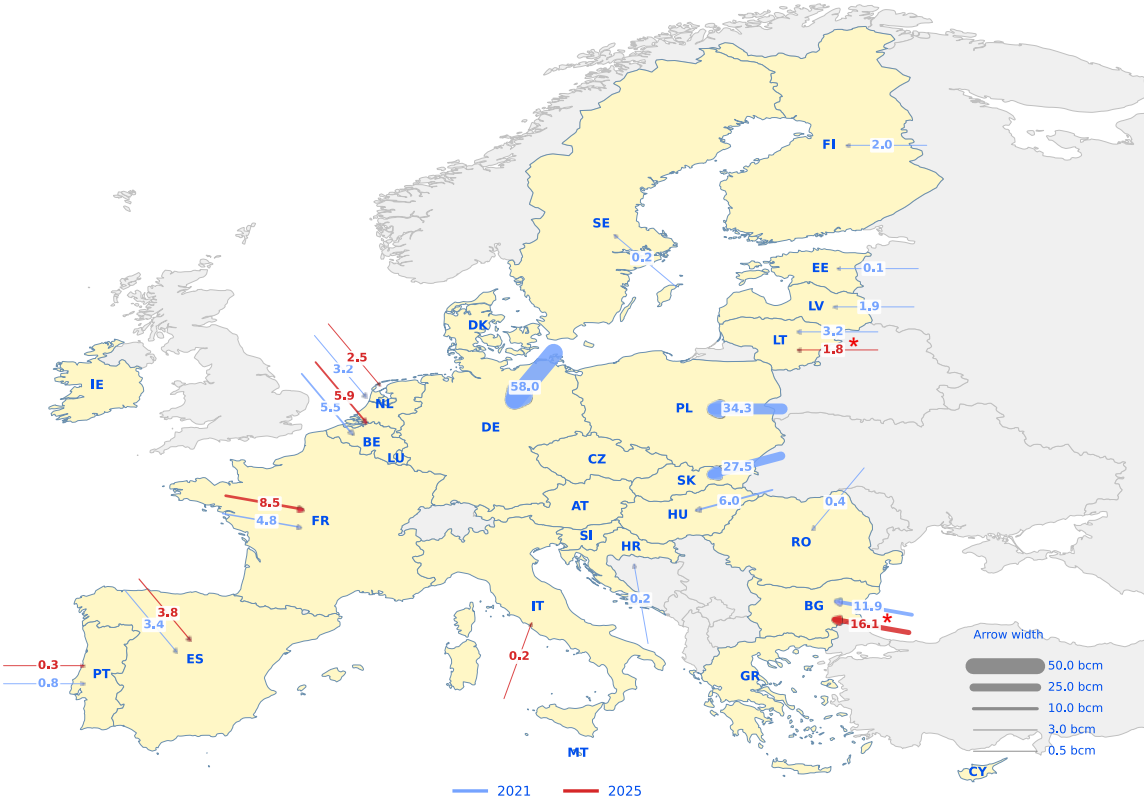
13 While for decades Russian gas had accounted from 35–45% of EU's gas supply[10], by September 2023 the share of Russian pipeline gas fell to around 8% and Russian LNG accounted for 5-6%.

14 The reshaping of EU's gas supply was backed by the REPowerEU Plan set out to strengthen the energy security of the EU through lower gas demand, supply diversification, and accelerated deployment of alternative energy sources. In terms of supply diversification, the EU on the one hand gradually lowered Russian imports via the reduction of the gas demand and on the other hand, significantly increased its reliance on LNG imports, alongside with an expanded LNG infrastructure and stronger cross-border integration that could accommodate West-East and coastal-to-inland flows across the continent allowing LNG-volumes to reach landlocked EU countries. Alternative pipeline suppliers, other than Russian, such as Algeria (representing 14% of total EU gas imports) and Norway (accounting 54% of EU pipeline supplies and roughly 30% of total EU gas imports today) stepped up, while in parallel, the United States emerged as EU's main LNG supplier, increasing its market share over 60% of EU's total LNG imports to date.

15 As of 2025–2026, Russian pipeline deliveries are mostly confined to the TurkStream corridor, as well as Russian LNG supplies, as presented in Figure 3 covering approximately 14% to 15% of total EU gas imports (which equates to roughly 12% to 13% of the EU's total gas demand).

16 Chapter 3 builds on and updates the analysis of EU gas market developments from late 2025 until 31 May 2026.

Figure 3: Physical imports of Russian pipeline gas and LNG at entry delivery points, 2021 and 2025 (bcm).



Source: ACER based on Eurostat [nrg_ti_gasm] and ICIS Heren.

Note: The quantities at entry delivery points in Lithuania and Bulgaria include volumes for third countries. In the case of Lithuania, the entry volumes are all destinated to Kaliningrad since 2022.

[10] During 2010 and 2021. Most Russian volumes were delivered via long-term pipeline contracts (around 175 bcm in nominal contracted capacity in 2021), combined with more limited LNG imports, seeing a growth only after 2018.

2. Russian gas supply contracts and imports

17 As required by Article 7(6) of the Regulation, this chapter provides an overview of Russian gas supply contracts (Section 2.1), as well as information on actual imports permitted during the transitional period established by the Regulation (Section 2.2). These imports concern supply contracts of Russian origin concluded before 17 June 2025. Subsequently, Section 2.3 presents the data on natural gas that originates in or is exported, directly or indirectly, from the Russian Federation entering the Union under a transit procedure as referred to in Article 5(10). Finally, Section 2.4 describes the diversification alternatives for those Member States relying significantly in Russian natural gas.

18 The Regulation establishes a legally binding prohibition on imports of Russian gas under new gas supply contracts, whether delivered by pipeline or in the form of LNG, from 18 March 2026 onwards. To facilitate an orderly and gradual phase-out, a transitional regime was introduced for gas supply contracts involving Russian gas that were concluded before 17 June 2025 and have not subsequently been amended, unless amendments fell within the scope of Article 4(5) of the Regulation. The transitional regime allows imports of Russian gas to continue for a limited period, subject to a prior authorisation procedure administered by the national Authorising Authorities. Applications for authorisation must be submitted at least one month before the planned entry of the Russian gas imports into the Union.

Table 1: Cut-off dates for existing Russian gas supply contracts during the transitional period.

Supply form	Short-term contracts	Long-term contracts
LNG	25 April 2026	1 January 2027
Pipeline	17 June 2026	30 September 2027[11]

19 From 18 March 2026 onwards, in accordance with Article 5(3), all gas imports into the Union are subject to prior authorisation, except for imports from countries that exported more than 5 bcm of natural gas to the EU in 2024 and either prohibited Russian gas imports (or apply equivalent restrictive measures) or lack infrastructure for LNG or pipeline gas imports[12].

20 When interpreting the data presented across this chapter, it is important to consider the EU gas system design aspects described in the Case box 1 below. The case helps contextualising the challenge in assigning Russian gas contracts and/or delivered volumes to specific final consumers and/or jurisdictions.

[11] Exceptionally, and at the latest, on 1 November 2027. Article 4(2) describes the conditions for a potential temporary exemption for existing supply contracts,

[12] Under the Regulation, six countries have been exempted so far from the prior authorisation requirements for natural gas imports: Algeria, Nigeria, Norway, Qatar, United Kingdom and United States.

CASE BOX 1: European Internal Gas Market functioning

The entry-exit model is a fundamental feature of the European gas market design. It decouples gas injections into the transmission system (entry) from withdrawals (exit), allowing network users to book entry and exit capacities independently without reserving a specific physical pipeline route. As a result, gas can be traded and allocated virtually anywhere within a balancing area, while the transmission system operator is responsible for managing the physical flows required to meet network constraints. Under this model, shippers manage portfolios of gas supplies, commercial transactions and balancing obligations within a balancing area. A shipper's supply portfolio may comprise multiple sources, including pipeline imports from Norway, Algeria, Russia or Azerbaijan, regasified LNG, domestic gas production, biomethane injected into the grid, and withdrawals from underground gas storage. Where gas is procured directly from a producer or importer, its origin is generally known. However, once gas is traded at a virtual trading point or gas hub, it becomes commercially fungible and its physical origin can no longer be attributed to subsequent transactions. Consequently, the various sources of supply are aggregated within the shipper's overall portfolio and are managed as a single commercial balance rather than as separate physical streams.

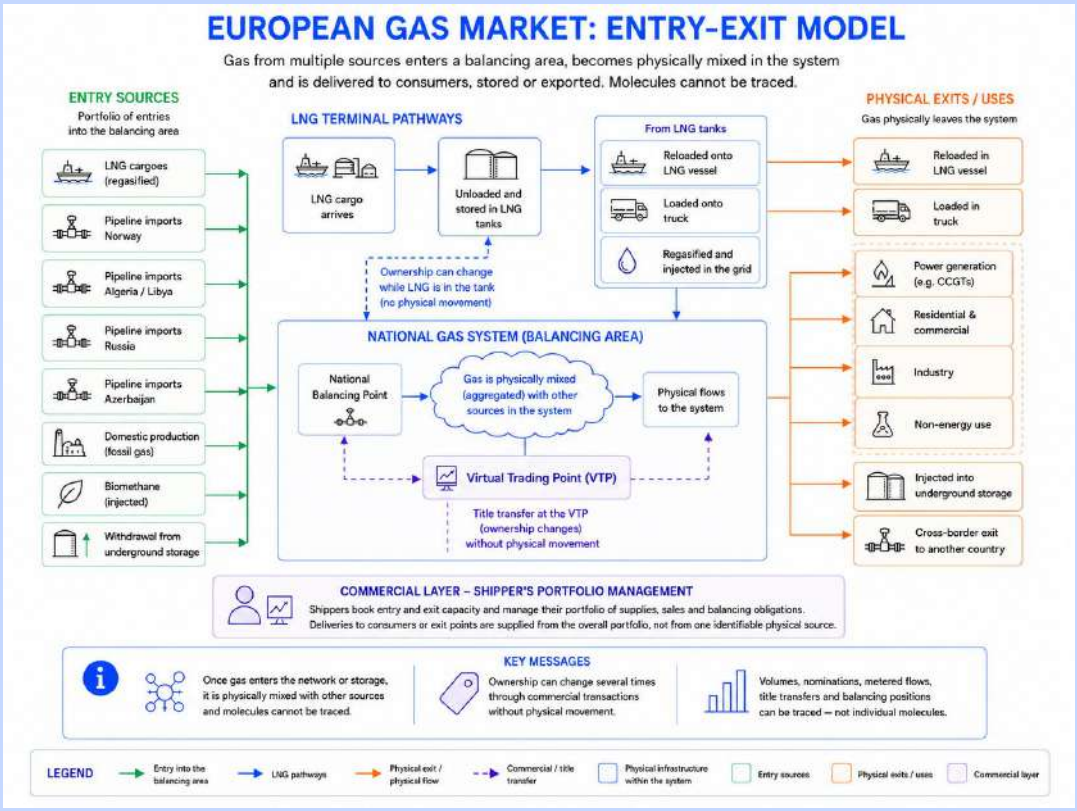
Consequently, gas delivered to final customers and or gas delivered to cross-border exit points is supplied from the shipper’s aggregated portfolio rather than from any single identifiable physical source. For example, a shipper may bring gas from several sources into the same balancing area and then sell gas to industrial consumers, power plants or other shippers at the virtual trading point. While commercial transactions determine ownership and contractual delivery rights, they do not trace the specific gas molecules ultimately consumed by individual end users.

For LNG, several commercial and physical outcomes are possible once a cargo is delivered to an LNG terminal. The LNG may be unloaded and stored in LNG tanks at the terminal. While the LNG remains in the tank, ownership may change through a commercial transaction without any physical movement taking place. In other words, the title to the LNG can be transferred between market participants while the LNG remains in the same physical location.

From the LNG tank, the gas may then follow different routes. It may be reloaded onto another LNG vessel, often following a commercial transaction between two parties. It may also be loaded onto trucks for onward delivery, which usually involves a sale or transfer to another market participant or shipper. Alternatively, the LNG may be regasified and injected into the national gas transmission system. In this case, regasification and injection do not necessarily imply a change of ownership, as the same shipper may retain title to the gas as it enters the network.

Once regasified and injected into the transmission system, the gas enters the national balancing area or national balancing point. From that moment, it becomes part of the wider gas system and is physically mixed with gas from other sources. Within this system, gas can also be traded at the virtual trading point. A title transfer at the virtual trading point means that ownership of the gas changes between market participants, but this commercial transaction does not necessarily correspond to any specific physical movement of gas between buyer and seller.

Within the balancing area, gas can be delivered to different types of consumers, including CCGTs and other power generation plants, residential and commercial customers, industrial users and non-energy consumers. Gas can also exit the system through cross-border interconnection points into another Member State, or it can be injected into an underground gas storage. Once injected into underground storage, the gas is mixed with other stored volumes. Ownership may remain with the same market participant, or it may subsequently change as a result of a commercial transaction.



This is why, once gas has entered a national or regional gas system, it is generally not possible to conclude that gas entering country A is physically consumed in country B, or that a given final consumer has consumed gas molecules from a specific origin.

This distinction is particularly important when assessing gas movements across the integrated European market. A country may physically receive gas at an entry point, while commercial ownership may change several times before the gas is consumed, stored or exported.

2.1 Russian gas supply contracts overview

21 Table 2 presents long-term Russian gas supply contracts[13] concluded before 17 June 2025 based on ACER's assessment of the information shared under Regulation (EU) 2026/261. Imports of Russian gas under these contracts have been authorised in accordance with the Regulation, allowing their continued import during the transition period.

22 The table offers an indicative overview, rather than a disclosure of the precise terms of each contract. The use of volume ranges provides sufficient granularity to support the assessment, while preserving the confidentiality of information submitted by market participants (based on Article 12 of the Regulation).

Table 2: Long-term Russian gas supply contracts with authorised supply requests to EU per delivery point, annual contracted volumes (bcm).

Gas type	Main delivery point	Range (bcm)
LNG	France	6-9.5
LNG	Spain	5-8
LNG	Belgium	7.5-12
LNG	Others (intra-EU, the Netherlands)	1.5-3
Pipeline	Greece	4-7
Pipeline	Landlocked Member States (Hungary, Slovakia)	12-19

Source: Authorisation regime for Russian gas imports.

Note on confidentiality:

The overview is presented in aggregated form by delivery country and gas type, with contracted volumes expressed in ranges based on the requirements of Article 12.

23 The overview presented is based on the information on gas supply contracts made available to ACER through the prior authorisation regime established by the Regulation (EU) 2026/261. While certain information on Russian gas supply contracts may be publicly available, including the identity of the contracting parties, nominal contract volumes and contractual durations, such information can only provide an indicative picture of the underlying contractual commitments. Consequently, the information derived from the authorisation regime provides the most accurate basis for assessing the volumes of Russian gas that arrive to the EU and remain eligible until fully phased-out[14].

24 By the beginning of June 2026, authorising authorities have granted authorisations for the import of Russian gas in connection to the long-term contracts presented in Table 2 amounting to around one-third of the LNG annual contracted volumes. In contrast, prior authorisations for pipeline gas imports exceeded 85% of the contracted volumes presented in Table 2[15]. This difference in the relative volumes authorised reflects the distinct supply patterns of LNG and pipeline gas; pipeline gas is typically delivered on a continuous basis, with a baseline daily flow scheduled and authorised in advance for the duration of the contract. LNG imports, by contrast, are generally requested and authorised on a cargo-by-cargo basis, resulting in a more gradual accumulation of authorised import volumes over time. Consequently, authorised pipeline

[13] Note that no authorisation requests had been submitted to the competent authorising authorities by the beginning of June 2026 regarding existing short-term gas supply contracts. See also paragraph 25.

[14] The authorisation of contracts shall enable to gain more reliable and up-to-date information on the volumes that may continue to be imported during the transitional period, taking into account subsequent amendments to the contracts, changes in contractual arrangements and other relevant provisions, such as flexibility clauses, which are typically not publicly disclosed.

[15] Under the REPowerEU Gas Regulation, authorisations for the import of Russian gas refer to authorisation for actual gas deliveries, tied to authorised underlying contracts. Actual imports require rigorous prior authorisation to verify the underlying contract details before entering the EU customs territory.

volumes can reach a higher share of contracted volumes earlier in the transition period than LNG volumes. It is also important to note that contracted volumes do not necessarily correspond to actual import volumes. Contracts may provide for volume flexibility, and authorised quantities may not be fully utilised for commercial or other reasons. Actual import volumes are analysed in Sections 2.2 and 3.2.

25 Regarding existing short-term gas supply contracts defined as contracts with a duration of less than one year and concluded before 17 June 2025, no authorisation requests had been submitted to the competent authorising authorities from January till the beginning of June 2026. The absence of authorised short-term contracts reflects the nature of this type of commercial arrangement. Short-term and spot gas contracts are typically concluded only shortly before the intended delivery date, with deliveries generally taking place within weeks or few months of the agreement. As a result, there were no short-term contractual commitments awaiting delivery agreed before the regulatory cut-off date. Consequently, all imports requiring authorisation relate to long-term contracts concluded before the cut-off date and still within their allowed transitional period.

26 Annual contracted volumes authorised under long-term contracts are broadly consistent with the contracted capacities underpinning Russian gas imports into the Union in 2025. Given that these authorised contracts remain valid throughout 2026 and, in the case of pipeline gas, most extend into 2027, the available information suggests that Russian gas imports into the Union during 2026 are likely to remain broadly comparable to the levels observed in 2025. Consequently, the authorisation regime appears to have preserved, during the transitional period, the capacity for Russian gas imports to continue at levels broadly equivalent to those prevailing prior to the entry into force of the phase-out measures. However, the extent to which this contractual capacity translates into actual imports will ultimately depend on commercial decisions and market conditions, pointing to that authorised volumes may differ from the final import volumes.

2.2 Russian imported volumes

27 To monitor imports of Russian gas, ACER relies on customs declaration data extracted from the European Commission's DG TAXUD Customs Surveillance Database, covering natural gas released for free circulation into the EU[16]. Table 3 presents the volumes of Russian LNG imported into the Union from January 2026 to April 2026, based on the data available at the time of preparation of this report and processed by ACER as described in the Methodological Note in Annex 2 of this report. To safeguard commercially sensitive information, certain data are presented in aggregated form.

28 The data currently available to ACER is limited to the aggregated customs information from January to April 2026, covering the period following the entry into force of the Regulation[17]. While these data provide an initial indication of import volumes, the observation period is limited because the Russian gas ban was effective from 18 March 2026 and should therefore be interpreted with caution.

[16] This procedure grants imported gas the customs status of domestic good within the EU, thereby legally permitting it to be sold, used, or moved freely within the economic territory of the Member State once all import formalities, duties, and applicable safety requirements have been fulfilled. The country reporting the release for free circulation is therefore the country that granted the import status, but not necessarily the country where the gas was ultimately consumed.

[17] Since the period from the start of the ban (18 March 2026) until the most available customs declaration data (April 2026) is limited, the period of the analysis has been extended to 1 January 2026. This approach reflects also the expectation that the announcement of the ban may have already influenced market behaviours and contract utilisation decisions prior to its formal adoption and implementation.

Table 3: Russian LNG import data per Member State where LNG was released for free circulation, January-April 2025 and 2026 (TWh).

Country	January-April 2026	January-April 2025	Delta
Belgium	18.6	16.4	2.2
Germany*	0.02	0.03	-0.01
Spain	23.2	17.6	5.6
France	18.5	38.5	-20
The Netherlands	7.7	7.1	0.6
Portugal	1.1	1.1	0
TOTAL	69.2	80.7	-11.5

Source: ACER based on DG TAXUD Customs Surveillance Database.

Note: LNG imports attributed to Germany in this table correspond to LNG loaded onto trucks in Kaliningrad (Russian Federation) before the entry into force of the import ban. These volumes were transported by road into the European Union and released for free circulation in Germany.

Table 4: Russian pipeline gas import data per Member State where gas is released for free circulation, January-April 2025 and 2026 (TWh).

Country	January-April 2026	January-April 2025	Delta
Belgium	0.3	0.4	-0.1
Bulgaria	8.6	6.3	2.3
Greece	11	14	-3
Hungary	24.7	23.7	1
Italy	0.01	0.3	-0.3
Slovakia	1.3	1.4	-0.1
TOTAL	45.9	46.3	-0.4

Source: ACER based on DG TAXUD Customs Surveillance Database.

29 To be noted is that the tables above reflect the acceptance date of the import declaration by customs authorities, rather than the date of the physical import of the gas. While physical deliveries are only allowed when meeting the prior authorisation requirements established in the Regulation, the information concerning the acceptance of declarations lodged in customs might arrive with a certain lag relative to the physical imports' date

30 Consequently, a timing difference may arise between the physical delivery of gas and its appearance in customs data. Imports delivered during a given period may therefore be recorded at a later date, while some declarations accepted during the reporting period may relate to earlier deliveries. This is exemplified in Table 5, comparing the evolution of both physical deliveries and import declarations in the analysed period.

31 As described in Table 5, physical deliveries of Russian gas into the EU during the period January to April 2026 increased by 13.6 TWh compared with the same period in 2025. However, when the analysis is based on the acceptance date of customs declarations, the Russian gas import volumes recorded for January to April 2026 are 11.9 TWh lower than the volumes recorded for the same period in 2025. This difference is mainly explained by the time required for customs data to be reported, validated, processed, consolidated and made available. As a result, the comparison should be interpreted with caution, particularly for short and recent reporting periods, as the available information may continue to be updated and improve in the following months.

Table 5: Comparison of the evolution of both physical deliveries and import declarations for both LNG and pipeline gas, January-April 2025 and 2026 (TWh).

Analysed period for the comparison	Physical deliveries	Import declarations
Jan-April 2026 vs. Jan-April 2025 (LNG + Pipeline)	13.6 TWh higher	11.9 TWh lower

Source: ACER based on DG TAXUD customs Surveillance database.

Note: The import declarations and physical deliveries do not match due to two reasons: (i) there is a lag in the reporting of import declarations and (ii) physical deliveries include natural gas transported to EU and non-EU countries.

32 This timing effect does not affect the usefulness of customs data for analysing overall import volumes and trends. However, this effect should be considered when analysing short reporting periods or comparing customs data with other sources, such as authorisation records or physical flow data.

33 The customs data presented in this report are based on the concept of release for free circulation, the main customs procedure applicable to imported goods. The data currently available to ACER cover approximately the first quarter of 2026. As the Russian gas phase-out measures started to apply on 18 March 2026, the available dataset covers only a limited period under the new regime. As a result, it is too early to draw conclusions regarding the impact of the Regulation on import patterns or market behaviour.

2.3 Russian gas entering the EU under transit procedure

34 In addition to the release of natural gas for free circulation, natural gas brought into the customs territory of the EU may move within that territory under a deemed transit procedure, it may remain in temporary storage (maximum duration 90 days) or be placed under the customs warehousing procedure (indefinite duration). As these movements are not subject to the same authorisation and monitoring requirements, dedicated safeguards are needed to ensure effective oversight and to verify that such volumes are not subsequently diverted into free circulation within the Union.

Table 6: Russian gas supply contracts in non-EU countries, annual contracted volumes (bcm).

	Main delivery point	Range (bcm)
Pipeline	Non-EU (transit via Bulgaria and via Lithuania)	3.5-6

Source: ACER based on public information.

Note on confidentiality:

The overview is presented in aggregated form by delivery country and gas type, with contracted volumes expressed as ranges to meet the requirements of Article 12.

35 Member States should also maintain appropriate monitoring and enforcement mechanisms for natural gas subject to such customs treatment pursuant to the Union Customs Code. These mechanisms should ensure that the use of Union storage infrastructure by third-country operators does not pose risks to national or regional security of supply or undermine the fulfilment of storage obligations.

36 Article 5(10) of the Regulation states where natural gas is transported through the Union from third country to third country under a transit procedure in accordance with the Union Customs Code, including for the purpose of storage under customs warehousing rules, authorising authorities and, where applicable, customs authorities shall be informed no later than 5 working days before the planned transit about:

(a) the country of production of the natural gas to be transported under a transit procedure, unless such information is not available;

(b) the planned or actual nomination schedules specifying volume, timing, and entry and exit points of the gas in transit, with daily granularity where applicable;

(c) volumes and delivery points in the gas supply contracts; and

(d) the contract between the seller or buyer or any intermediary entity and the relevant Transmission System Operators in the Union, where applicable.

37 Based on the information analysed by ACER, three main potential transit routes have been identified where natural gas may enter or cross the Union under customs transit arrangements before being delivered to third countries:

- Serbia / North Macedonia: flows entering the Union through Bulgaria and Hungary, with Serbia and North Macedonia identified as the apparent destination;

- Transnistria-Moldova: flows entering the Union through Bulgaria and Romania, with Transnistria in Moldova identified as the possible (this route remains under scrutiny, as ACER has not received confirmation from the relevant Authorising Authorities that such transit volumes are taking place);

- Kaliningrad: flows crossing Lithuania under transit arrangements from Belarus towards Kaliningrad in the Russian Federation.

38 The routes involving Bulgaria, Hungary and Romania appear to relate primarily to pipeline gas entering the Union from the south-eastern corridor and then being transported onwards to neighbouring third countries. In these cases, the challenge is to ensure that volumes declared as transit are effectively delivered outside the Union and are not subsequently released for free circulation or used to supply Union customers without being subject to the applicable authorisation requirements.

39 The case of Kaliningrad is different in nature, as it concerns gas originating in a Russian Federation exclave and crossing Union territory, notably Lithuania, under transit arrangements. While such movements may be intended to preserve the continuity of supply to or from Kaliningrad, they still require appropriate monitoring to ensure that the use of Union territory does not create a route for circumventing the restrictions applicable to Russian gas imports into the Union.

Table 7: Transit volumes via pipeline, January-April 2026 (TWh).

Transit Jan-Apr'26 Pipeline gas (TWh)	Bulgaria	Romania	Hungary	Lithuania	EU
Serbia	36.8	-	0.3	-	37.1
North Macedonia	2.3	-	-	-	2.3
Kaliningrad	-	-	-	9.3	9.3
Moldova / Transnistria	-	-	-	-	-
TOTAL	39.1	-	0.3	9.3	48.7

Source: ACER based on information provided by relevant Authorising Authorities.

Note: Strandhsa-2/Malkoclar (Turkish-Bulgarian border) to entry point Zvornik (border between Serbia and Bosnia and Herzegovina) for Bosnia. Entry point Strandzha 2/Malkoclar - exit point Kireevo/Zaychar, for Serbia. Entry point Strandzha 2/Malkoclar - exit point Kyustendil/Zidilovo.(for North Macedonia).

40 During the period January–April 2026, transit of Russian pipeline gas through EU Member States to third countries amounted to approximately 50 TWh. Serbia received the largest share of these volumes, accounting for around 75% of total transit flows, primarily via Bulgaria, with a marginal contribution through Hungary. North Macedonia received a smaller share exclusively via Bulgaria, while Lithuania facilitated transit flows to the Kaliningrad region. No transit volumes were recorded towards Moldova/Transnistria during this period. Overall, Bulgaria remained the main transit corridor for Russian gas flows to the Western Balkans, while Lithuania served as the sole route for supplies to Kaliningrad. These figures are based on data compiled by ACER from information provided by the European Commission and the relevant customs authorities.

2.4. Reliance on Russian gas imports and diversification alternatives

41 The assessment presented in this section reflects ACER's analytical view, informed by both its own and external data sources, on challenges and opportunities associated with the phase-out of Russian gas. Policy measures and diversification strategies will be developed by Member States through their respective National Diversification Plans, which will set out formal actions to reduce dependence on Russian gas and secure alternative sources of supply. A more comprehensive assessment of these national plans is expected to be published by the European Commission in the second half of 2026.

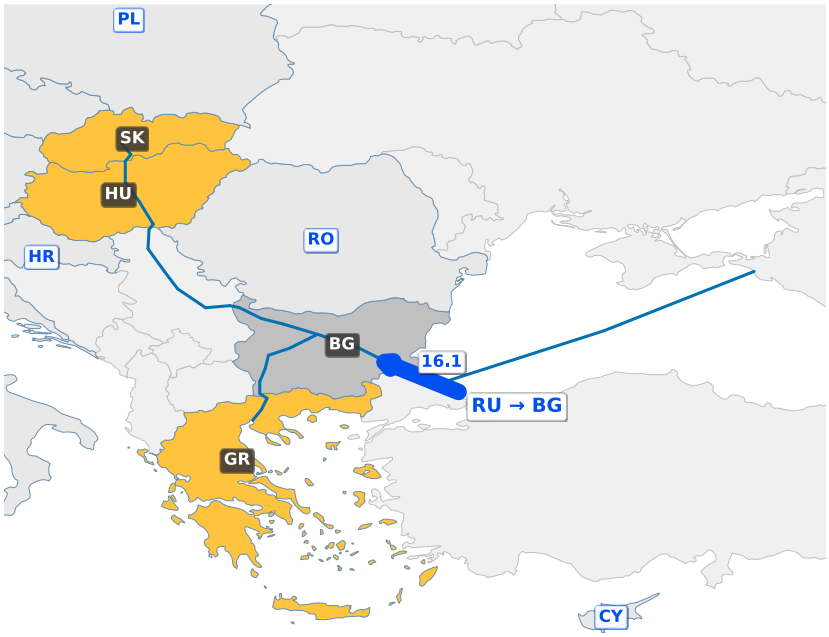
42 The European Union has made substantial progress in reducing its reliance on Russian gas imports since 2022. The remaining dependence on Russian gas remains unevenly distributed across Member States; while most countries have significantly reduced their exposure, a small number of countries continue to rely heavily on Russian gas and therefore face a more challenging transition to phasing it out. A first distinction can be made between Member States still importing Russian LNG and Member States importing Russian gas through pipelines.

Reliance on pipeline gas and diversification alternatives

43 Various Member States are still reliant on Russian pipeline gas imports. In 2024, Hungary and Slovakia are estimated to source approximately 70–80% of their gas from Russia, while Russian gas is deemed representing approximately 50-55% of Greek gas imports. All three countries bring Russian gas primarily through the TurkStream corridor, making these countries exposed to potential disruptions or restrictions affecting this route. After Gazprom cutting supplies to Bulgaria in April 2022, some reports[18] suggest that Russian gas continues to be consumed in Bulgaria, either re-exported from Greece to Bulgaria, or as TurkStream transit flows may be used in the country. Absent further evidence, Bulgaria is excluded from the analysis below.

[18] See for example Standard & Poor article, quoting Bulgarian authorities.

Figure 4: Countries estimated to have a significant Russian gas dependency, 2025.



Source: ACER based on ENTSOG, Eurostat and ICIS Heren. In blue, TurkStream pipeline.

44 In Hungary, natural gas accounts for approximately one-third of the country's total energy balance and remains essential for heating, industrial activity and power generation. Although Hungary benefits from a large nuclear fleet and rapidly expanding solar generation, gas continues to play a critical role in ensuring electricity system flexibility and meeting winter heating demand.

45 In Slovakia, gas is used primarily in industry and heating rather than power generation. Slovakia's electricity system is largely based on nuclear power, which provides more than half of its domestic electricity generation. Slovakia was the main transit route for Russian gas moving across Ukraine towards Central Europe, which historically also served the Slovak gas demand. After the ceased gas transits through Ukraine by the end of December 2024, the interconnection with Hungary has played an important role to reroute some of the lost Russian volumes to the country. Pipelines linking Slovakia to Poland, or connections that can bring in LNG from coastal Member States from the West or Southeast are expected to play an increasing role to support Slovakia’s efforts to phase out remaining Russian volumes.

46 Greece presents a different profile. Although less dependent on Russian gas than Hungary or Slovakia, natural gas plays a central role in electricity generation, with power plants accounting for the majority of national gas consumption. This is despite Greece emerging as one of the fastest-growing renewable electricity markets in Europe. At the same time, Greece benefits from the most diversified gas import portfolio among the three countries, including LNG imports through Revithoussa and Alexandroupolis, as well as pipeline imports from Azerbaijan through the Trans Adriatic Pipeline (TAP).

Table 8: Overview of Russian gas dependency and overall gas significance in the national energy sector of a selection of Eastern Member States – 2024, 2025 (bcm).

Indicator	Hungary	Slovakia	Greece
Annual gas demand 2025 (bcm)	~9	~4.5	~6.5
Domestic production (as share of annual demand, %)	~15%	2%	0%
Gas storage technical capacity 2025 (bcm)	6.3	3.2	0
Russian share of gas supply, 2024	75-80%	70-80%	50-55%
Main gas consuming sector	Residential Heating Industry and services	Industry & Residential Heating	Power generation
Gas for power over total gas demand (%)	15-20% of gas demand	10-15% of gas demand	65-70% of gas demand
Gas share in power generation (%)	10-15%	5-10%	35-45%
Gas exports 2025 (bcm)	> 4.5 bcm (to Slovakia and Ukraine)	Exports limited after end of Ukraine transit	<1bcm exports to Bulgaria. Transit country for Azeri gas to Italy
Main supply route	TurkStream Via Serbia	Ukraine transit corridor (until end-2024), TurkStream Via Hungary	TurkStream via Bulgaria
Possible alternative gas routes	Croatia LNG, Romania, Austria	Poland, Germany/Czechia, Austria all tied to LNG	Revithoussa LNG, Alexandroupolis FSRU, TAP

Source: FGSZ, Eurogas, DESFA, ENTSOG, GIE and Eurostat energy balances.

Note: The possible alternative gas routes are presented at a general level. Actual gas flows would depend on the availability of infrastructure capacity and market participants' contracting decisions and options. While the case box below provides indicative directional insights, this analysis has not been fully developed at this stage. The next edition of the report will enhance the current assessment.

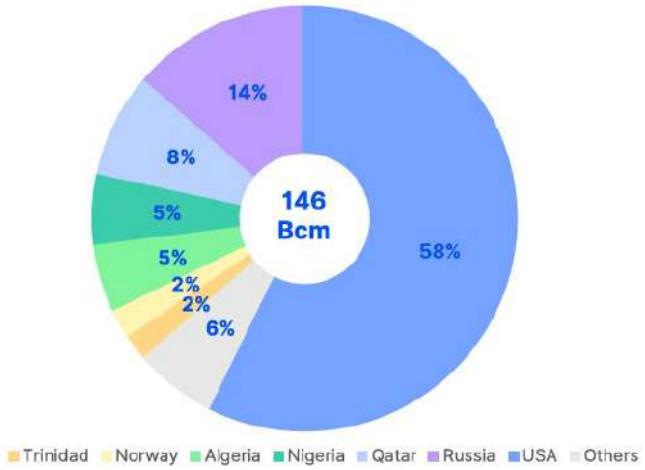
Reliance on LNG and diversification alternatives

47 Despite the significant reduction in Russian pipeline gas imports since 2022, Russia remains an important supplier of LNG to the European Union. In 2026, Russian LNG imports are projected to reach around 20 bcm, accounting for over 15% of total EU LNG imports and around 5-6% of total EU gas consumption. These volumes are primarily imported through terminals in France, Belgium, Spain and the Netherlands[19] and can then be distributed through the interconnected European gas network. Owing to the high degree of integration of the EU gas market, Russian LNG is not necessarily confined to importing Member States, as hub trading and cross-border flows can extend its consumption across the Union. This is for example deemed to be the case of Germany, where direct imports of Russian LNG are not permitted under national law[20], but Russian volumes could indirectly flow into the country.

[19] If those direct Russian LNG imports were assumed to fully cover the domestic demand of the landing countries, the estimated supply share would range between 5% and 20%. However, as noted such an approach would not provide an accurate assessment.

[20] Public reports in 2024–2025 (e.g., link) indicated that a German company continued receiving large quantities of contracted Russian LNG through terminals in France and Belgium, despite the national prohibition rules.

Figure 5: Diversification of EU LNG imports – 2025 (%).



Source: ACER based on ICIS Heren data.

48 The EU should a priori be well positioned to manage the phase-out of Russian LNG imports. As it benefits from substantial regasification capacities, strong interconnections and access to diversified global LNG supply sources, enabling efficient market-based substitution.

49 Absent further geopolitical conflicts or exceptional events, the main effects of a phase-out are expected to be related to the capability of the market to optimise commercial opportunities. In the short term, substitution needs can increase competition for flexible LNG cargoes during periods of tight global balances, particularly during winters or during supply disruptions, leading to higher procurement costs and increased price volatility. However, these effects can be smoothed with sufficient lead times for purchasers to rebalance supply portfolios with alternative gas and/or swaps. The EU's growing reliance on globally traded LNG volumes, including spot and short-term contracts, enhances sourcing flexibility but increases EU's exposure to global LNG price formation. At the same time, global LNG markets are characterised by demand responsiveness: higher prices can induce fuel switching, demand reduction, and/or efficiency gains in the EU and other importing regions, releasing volumes that contribute to rebalancing of the LNG market.

50 Remaining risks are primarily linked to global LNG market dynamics and geopolitical developments. These include delays in liquefaction projects, unplanned outages at export facilities, stronger-than-expected demand growth in Asia, and disruptions affecting key maritime transport routes. Diversification away from Russian LNG may increase the relative importance of suppliers such as the United States and Qatar, the latter depending on whether the developments in the Middle East finally improve.

CASE BOX 2: Diversifying away from TurkStream gas in Eastern Europe

In this Case box, the possible alternative gas sources and supply routes are discussed at a general level. Actual gas flows would depend on the availability of infrastructure capacity and market participants' contracting decisions and options. While the case box provides indicative directional insights, the analysis remains preliminary at this stage. The next edition of the report will further develop this assessment, including links to the national diversification plans away from Russian gas that Member States are required to prepare and that DG ENER is tasked with evaluating.

By end-September 2027, Russian gas imports to the EU through TurkStream, the last remaining major Russian pipeline entry route, shall stop. In 2025, deliveries through TurkStream reached around 16 bcm, of which approximately 3 bcm were supplied to Serbia, Bosnia and Herzegovina, and North Macedonia. In 2026, this route is expected to still account for a significant share of the gas imports delivered to Hungary, Greece and Slovakia. Replacing those Russian volumes will depend not only on access to alternative supply sources, but also on the availability of transmission infrastructure and on market conditions that enable gas to be contracted and transported efficiently from new entry points to inland demand centres.

The Commission's Staff working document[21], in 2025, provided an assessment on the available alternatives to replace Russian gas and the status of the EU gas network infrastructure to facilitate this phase out. Current EU gas infrastructure, along with new planned developments, will enable greater access to alternative non-Russian supply sources, improving connectivity and helping to address access constraints. Non-Russian supply sourcing options in the region can be grouped into three main categories:

i. Increased LNG imports through terminals in both Southern and Northern Europe, notably via Croatia, Greece, and even Türkiye, as well as from Germany, Poland and Lithuania. The combined currently unused capacity and planned expansions in those countries provide regasification capacity significantly exceeding the Russian pipeline gas supplied to the region. However, the effective contribution of these LNG resources depends on the terminals' commercial access, prevailing market conditions and contractual regimes, and available transmission capacity from coastal terminals to end-consumption areas.

ii. Increased pipeline imports from Azerbaijan via the Southern Gas Corridor. In 2025, gas flows delivered through TAP and IGB to Southeast Europe and Italy amounted to approximately 10 bcm. A planned capacity expansion in 2026 is expected to increase the total capacity from 10 to 11.5 bcm/year[22]. In addition, diversification can be further supported by Norwegian gas supplied via the Baltic Pipe, which has a technical capacity of 10 bcm/year and connects the Norwegian Continental Shelf to Poland and the broader Central European market.

iii. Incremental domestic production, primarily from Romania's Black Sea offshore resources, notably Neptune Deep, is expected to provide approximately 8–10 bcm/year of additional production in the coming year. These volumes should contribute to both Romanian domestic consumption and to regional supply diversification through exports to neighbouring markets, depending on market conditions, internal network reinforcement, and domestic demand developments.

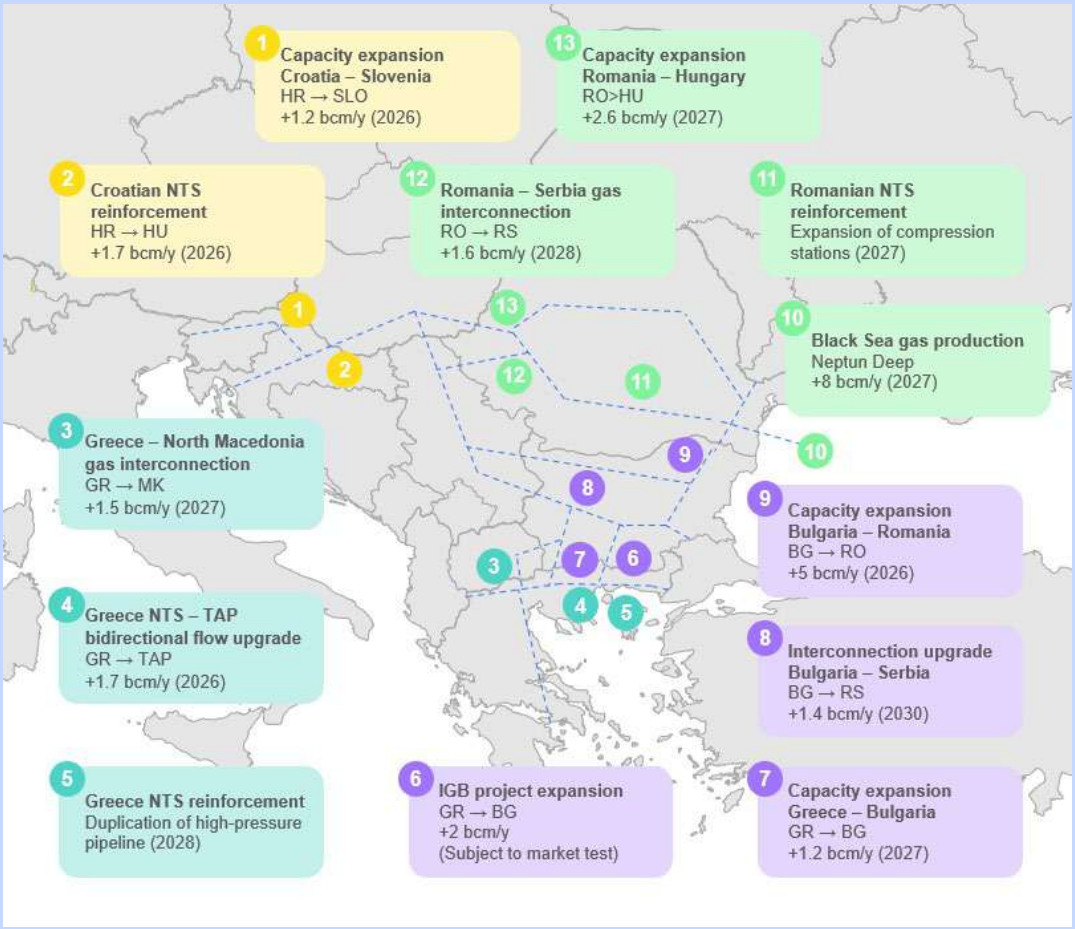
Figure 6 presents the latest planned key infrastructure developments in Southeast Europe. The focus is on both cross-border capacity expansions and internal network reinforcements which together aim to remove structural bottlenecks, enhance system flexibility, and ensure that alternative supply sources can be efficiently transported across national borders to demand centres in the region that will be more impacted by the termination of the Russian flows through TurkStream.[23] It is worth also to mention that final utilisation of the individual routes will be also partly driven by the relative competitiveness of the transport costs across the different routes.

[21] COMMISSION STAFF WORKING DOCUMENT Assessing the impact of measures to phase out Russian gas imports and improve the monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938 Accompanying the document Proposal for a Regulation of the European Parliament and the Council on phasing out Russian gas imports, improving the monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938.

[22] Further expansion to up to 20 bcm/year could be achieved in the coming years, subject to market tests, upstream production growth and additional compression investments along the corridor.

[23] Additionally, ongoing capacity expansions at the Brandov IP between Germany and Czechia and Tarvisio IP between Italy and Austria will allow significantly more gas from non-Russian sources to flow to Central and Eastern Europe from the beginning of 2027.

Figure 6: Existing and planned infrastructure developments in the Southeast EU region.



Source: ACER based on ENTSOG TYNDP 2026.

Note: The map above presents a simplified representation of the gas network in the Southeast European (SEE) region. The list of projects shown is indicative and should not be considered exhaustive. The merits of the various projects will be assessed through the relevant infrastructure governance and investment frameworks. Only projects with a maturity status of Advanced or Final Investment Decision (FID) have been considered. Furthermore, the list is limited to projects promoted in Croatia, Greece, Bulgaria, and Romania that are expected to have an impact on the Southeast European region. NTS refers to the National Transmission System.

3. Preliminary trends on the impact of the Russian gas phase out on EU gas markets

51 This final chapter focuses on the preliminary impacts of the Russian gas phase-out on the EU wholesale gas markets. This chapter completes first chapter of the report on the market developments and offers additional analyses over the same timeframes as Chapter 2, which was solely built on customs data. The chapter uses ACER's analytical framework developed for gas wholesale market assessments.

3.1. Description of the analytical framework

52 The assessment of the market impacts related to the Russian gas ban is structured along five analytical dimensions, namely: 1) supply, 2) flows and infrastructure, 3) prices, 4) demand, and 5) underground gas storages. For each dimension, the analytical framework combines quantitative indicators with contextual analysis. The overall objective is to assess the market adjustment dynamics following the ban, including potential effects on security of supply, infrastructure utilisation, and price formation.

53 In assessing market impacts, ACER leverages datasets and metrics used in its Gas Wholesale Monitoring Reports[24]. Attention is paid to the impacts and specific challenges faced by landlocked Member States, and how they can rely on cross-border infrastructure to be able to diversify away from Russian gas supply (as discussed in Section 2.3).

54 In practical terms, the analysis of each dimension follows a standardised structure, summarised in Table 9. Each section begins by outlining the objective, rationale, and expected theoretical effects of the phase-out for the respective dimension. It then presents: (i) key tracked indicators used to test the underlying assumptions; (ii) observed results; (iii) identified impacts to date; and (iv) supporting analysis, including empirical evidence. A detailed assessment for each dimension is provided in Annex 1, while a general overview of market impacts is summarised in Section 3.2.

Table 9: Selected indicators, aim and rationale along five analytical dimensions of market developments.

Dimension	Indicators	Aim	Rationale
Gas supply	Russian pipeline gas; Russian LNG; Turkish pipeline gas	Assess shifts in EU gas supply sources following the ban	Evaluates whether reduced Russian supplies are offset by alternative imports
Gas flows and infrastructure	European LNG terminal utilisation; capacity utilisation at selected Hungarian and Slovak cross-border points	Track changes in gas flows and infrastructure use	Offers an evolution of gas flows and infrastructure adequacy
Prices	TTF day-ahead price; HU-TTF price spread; SK-TTF price spread; Asian LNG premium	Assess price impacts and price convergence at the hubs most exposed to the ban	Evaluates whether reduced Russian imports increase regional price divergence and LNG competition
Gas demand	EU gas consumption; gas consumption in Member States with Russian gas contracts	Monitor demand trends in exposed markets	Lower Russian supply (or higher prices) may reduce demand
Underground gas storage	Gas storage filling level on 1 April (EU, SK, HU); gas volume added since 1 April (EU, SK, HU)	Monitor storage utilisation trends, critical assets for safeguarding EU security of energy supply	Lower Russian imports may increase withdrawals or reduce injection rates

55 This first report looks only at gas supply, flows and infrastructure use and prices. The analysis will be enhanced for the second edition of the report to be published in 2027, by adding indicators

[24] Since 2012, ACER's Annual Gas Market Monitoring Reports have analysed developments in EU gas markets. Since 2021, ACER issues Quarterly Reports assessing ongoing market trends, as well as dedicated reports covering specific topics, including LNG markets, capacity utilisation, and developments related to decarbonised gases. ACER's reports are available here (link).

on gas demand and underground gas storage. ACER invites market participants to provide feedback and suggestions on the effectiveness of its analytical approach.

56 Regarding the timeline of the analyses - and given that the time between the start of the ban on 18 March 2026 and the publication of this report on 1 July is short, the assessment spans 1 January to 31 May 2026. Where relevant, results are also presented separately, distinguishing the periods before and after the formal entry into force of the ban. This approach also reflects the possibility that the announcement of the ban may already have influenced market behaviour and contract utilisation decisions prior to its formal implementation. The analytical timeline, at any event, is very short to draw firm conclusions.

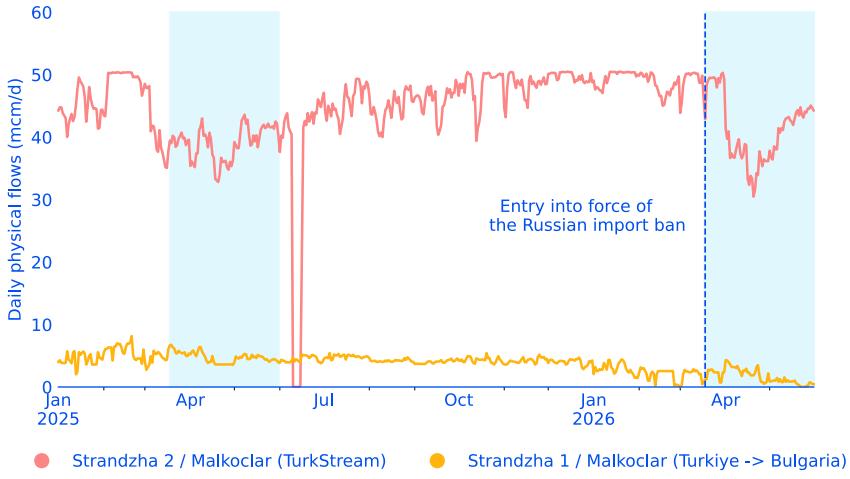
57 Moreover, it must be underscored that attributing unequivocal impacts and direct effects solely to the Russian ban is a challenging task, given the highly integrated and intricate nature of EU gas market dynamics and the volatile geopolitical landscape. As such the current analysis, includes not only the impact of the ban but also the Middle East conflict that started on 28 February and the subsequent closure of the Strait of Hormuz.

3.2. Market impact of the Russian gas phase out to date

58 The impact of the Russian gas import ban on EU gas markets appears limited at this stage. This is most likely linked to the fact that most of the ban is not in effect yet. No significant effects have been observed in terms of shifting flow patterns or price convergence developments. Nonetheless, some emerging market trends warrant continued monitoring, including the potential risk of higher prices in the eastern part of the EU (not yet observed at this stage), infrastructure capacity utilisation and possible congestion along alternative supply routes. Annex 1 provides further details on the analyses and metrics that ACER intends to use to track these developments in the next edition of the report.

59 As shown in Figure 7 (for pipeline flows) and Figure 8 (for LNG), between January and May 2026, Russian pipeline gas imports increased by 7% year-on-year, while Russian LNG imports rose by 11%. More specifically since the ban entered into force on 18 March 2026, pipeline gas imports increased by 5% and Russian LNG imports continued to grow (+17%), both compared to the same period in 2025. The assessment is based on physical flows and is more complete than the analyses based on customs' data as presented in Chapter 2.

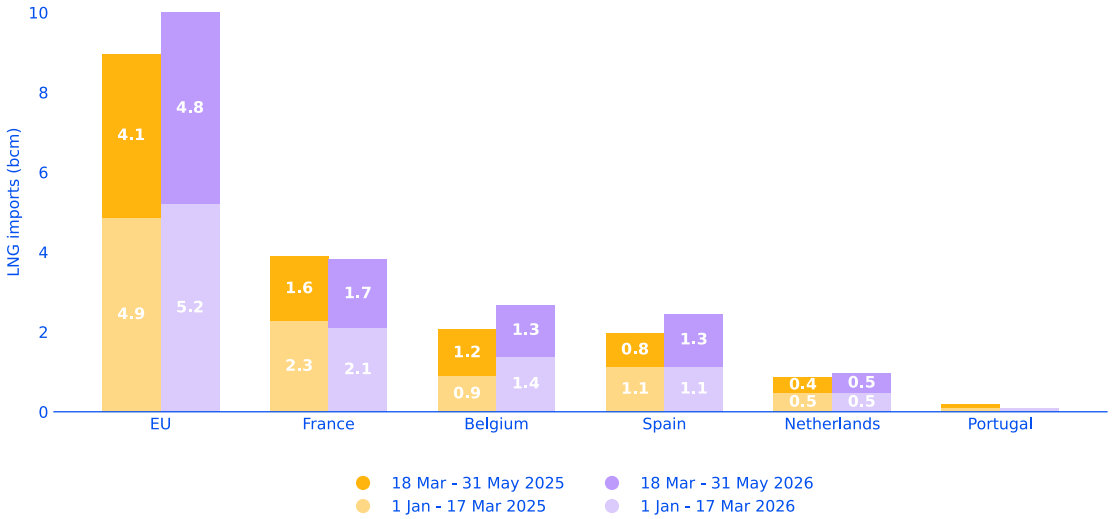
Figure 7: Daily pipeline physical flows via TurkStream and Strandzha 1, January 2025 – May 2026 (mcm/d).



Source: ACER based on ENTSOG Transparency Platform.

Note: The physical pipeline gas flows have been compared against the import declarations in Table 5.

Figure 8: Russian LNG imports at EU level and by Member State, 1 January – 17 March and 18 March – 31 May in 2025 and 2026 (bcm).



Source: ACER based on ICIS Heren data.

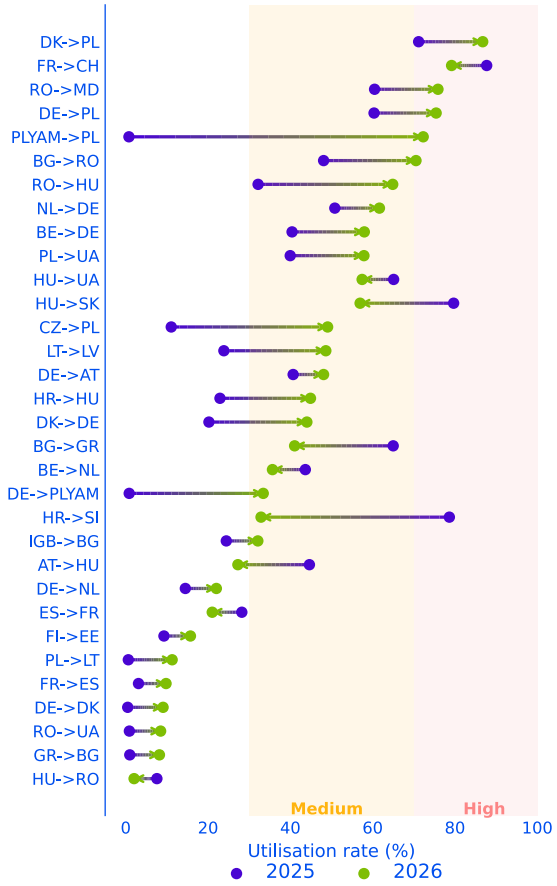
Note: The Russian import ban started on 18 March 2026 but the period from 1 January until 17 March is also included to reflect the expectation that the announcement of the ban may already have influenced market behaviour prior to its formal implementation. These physical flows have been compared against the import declarations in Table 5.

60 The increase in Russian gas imports likely reflects frontloaded deliveries and adjustments to contractual arrangements ahead of tighter restrictions. Market conditions are deemed to have also contributed, including efforts to maximise supply from alternative sources following the closure of the Strait of Hormuz. In addition, since March 2025, part of the Russian LNG that was previously transhipped at selected EU ports may have remained within the EU market (the latter consideration is further analysed in Annex 1, section A.1.)

61 It is to be noted that since the import ban there has been a sharp decline in imports of non-authorised Russian gas via Türkiye since 18 March 2026, with volumes entering through the Strandzha 1 route and falling by 65% year-on-year. Overall, however, supply patterns across the EU have not materially changed.

62 This limited impact of the ban so far is also reflected in cross-border gas flows. While some slight adjustments can be observed compared to 2025 (see also Annex 1, section A.2), the EU gas network operates broadly consistently with the values observed in 2025, which reflects the outcome of the reconfiguration of flows followed by the end of Russian gas transit through Ukraine in January 2025. Physical congestion remains limited across most corridors. Nonetheless, utilisation rates are already elevated (see Figure 9) on selected cross-border interconnections that are expected to become increasingly important as Russian supplies are fully phased out. This underlines the importance of accelerating targeted infrastructure investments and ensuring adequate access to available capacity.

Figure 9: Relative change in utilisation of European gas cross-border interconnection points in January-June 2026 compared to the January-May 2025 (%).



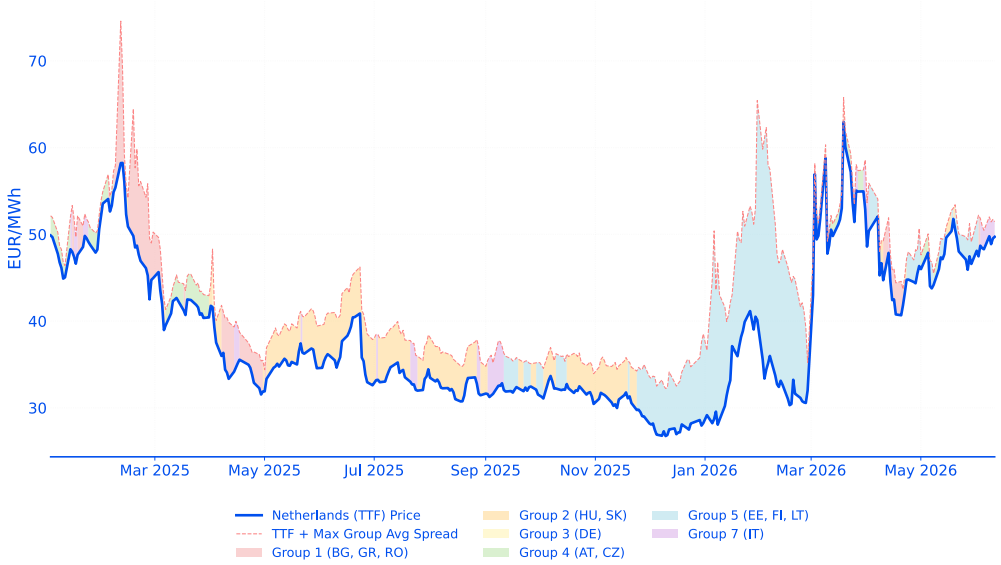
Source: ACER based on ENTSOG Transparency Platform and JRC (eurogastp Python package).

Note: Utilisation[25] is defined as gas physical flow divided by the corresponding technical capacity. Only interconnection points where utilisation changed by 5 percentage points or more are shown.

63 Finally, price developments across European gas hubs show limited market movements so far. Although Eastern European hubs have historically traded at a premium of 1.5–3 EUR/MWh compared with Western hubs, no deterioration in hub convergence has been observed since the introduction of the ban; if anything, convergence has improved slightly. At this stage it is, however, premature to link this to the ban. Again, this is one of the key metrics that warrants continuous monitoring, to be followed up in 2027, when ACER will publish the next edition of the report.

[25] The utilisation rate reflects the extent to which the available transmission capacity is used over time. Utilisation of a given edge in the target topology over a specific timeframe is defined as the average of the daily utilisation rates. Each daily utilisation rate is calculated by dividing the physical gas flow by the corresponding technical capacity for that day. To align with ENTSOG's capacity map and observed gas flows, firm technical capacity has been further refined on a case-by-case basis using various approaches (outlier removal, smoothing, or assuming a constant value over specific periods). It is also assumed that utilisation rate is capped at 100% where observed gas flows exceed technical firm capacity.

Figure 10: Analysis of maximum country-group hub price divergence for the day-ahead product at a selection of European countries, relative to TTF, 1 January 2025 - 11 June 2026 (EUR/MWh).



Source: ACER based on REMIT data.

Note: Countries are grouped accordingly to the similarity of market behaviour and premium to the TTF. Market liquidity is significantly different across countries.

Conclusion and outlook: Gas wholesale market dynamics in a post-Russian ban EU market

46 Impacts of the Russian gas import ban may become visible from 2027 onwards. Following the full cessation of Russian gas flows, EU gas wholesale markets are likely to become more exposed to LNG supply. Final import needs will, however, depend on the pace of decarbonisation, improvements in energy efficiency, and overall demand trends.

47 Regarding price developments, greater reliance on LNG is expected to increase exposure to global price dynamics and potentially raise price volatility, depending on contractual structures and geopolitical developments. The full phase-out of coal-fired generation (which reduces fuel-switching flexibility between gas and coal), greater reliance on spot LNG in a declining-demand environment, and variability in renewable generation requiring frequent gas-fired back-up call for a holistic management of the EU energy infrastructure. In this context, storage adequacy is becoming increasingly important. At the same time, the growing role of financial participants in energy markets warrants continued monitoring, as highlighted in the recent Gas Market Task Force report[26].

48 The EU domestic production of natural gas continues to decline, covering around 12% of total consumption in 2025. The new developments in Romania are called to partially offset this trend and increase security of supply.

49 Looking further ahead, EU gas supply will need to adjust to structurally declining demand. Decarbonised gases are expected to play a gradually more increasing role in supporting both security of supply and decarbonisation objectives, provided they can be developed in a cost-competitive manner, serving the needs of consumers and industry. Both biomethane[27] and hydrogen are expected to contribute materially over the medium to long term. If achieved, these developments would partially offset by declining foreign fossil gas production.

[26] The Gas Market Task Force, established in February 2025, as part of the Clean Industrial Deal and the Affordable Energy Action Plan, scrutinised the functioning of EU gas and gas derivatives markets to identifying possible shortcomings and proposing actions to address those. The report, prepared by the Task Force, concludes that both markets are functioning well and suggests potential further work to ensure that European gas and gas derivatives markets continue delivering for European businesses and consumers.

[27] Biomethane production reached around 4.3 bcm in 2024.

Annex 1. Analytical framework applied to assess the impacts of the Russian gas phase out

Period January to May 2026

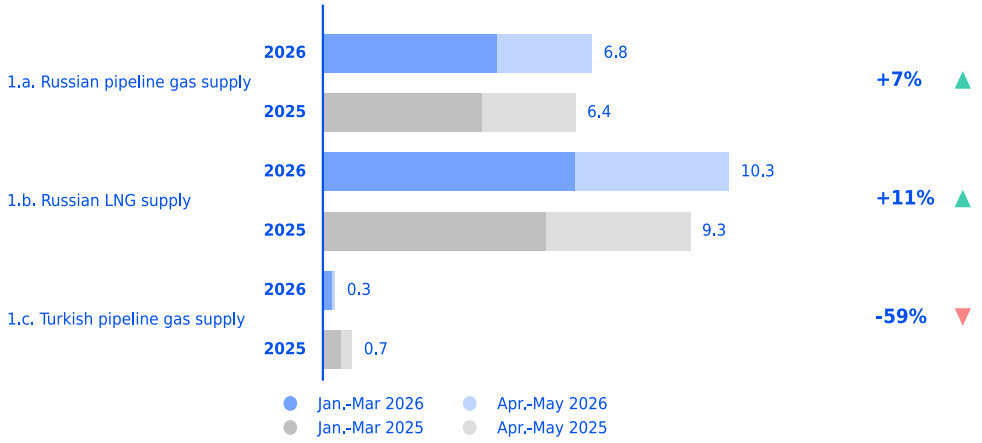
A.1. Did the first phase of the Russian gas phase-out impact EU gas supply?

50 **Aim**: these indicators track changes in EU gas supply origins before and after the Russian gas ban, showing the transition for both pipelines and LNG supply.

51 **Rationale:** to highlight potential changes either increases or reductions in Russian gas supplies.

i. Tracked indicators

Figure 11: Tracked indicators of Russian pipeline and LNG supply as well as Turkish gas supply (bcm).



Source: ACER based on ENTSOG Transparency Platform and ICIS Heren.

Temporal scope: 1 January 2025 – 31 May 2025 vs 1 January 2026 – 31 May 2026.
Supply origins considered: 1.a. Russian pipeline gas, 1.b. Russian LNG, and 1.c. Turkish pipeline gas.
Note: Supply via Türkiye refers to the gas entering through interconnection point of Strandzha (BG)/Malkoclar (TR).

ii. Observed results

52 Russian pipeline gas imports increased by 7% year-on-year between January and May 2026, while Russian LNG imports rose by 11%. Since the ban took effect, Russian pipeline gas imports have increased by 5%, whereas Russian LNG imports continued to increase (+17%, with all the Russian LNG imports since 18 March backed by long-term authorised contracts only). Noticeably, imports of non-Azerbaijani gas via Türkiye declined by 65% year-on-year after the ban.

53 The impact of the Middle East conflict (which began on 28 February 2026) and the introduction of the Russian import ban (by 18 March 2026) coincided. Since April 2026, total EU LNG imports fell by 10% year-on-year amid a near-complete loss of Qatari LNG (-95%), as well as higher prices and inverted summer-winter spreads reducing filling incentives in gas storages. Missing Qatari LNG imports were partly offset by increased LNG imports of other origins, like the acceleration of using Russian sources or US LNG.

iii. Noticed impacts

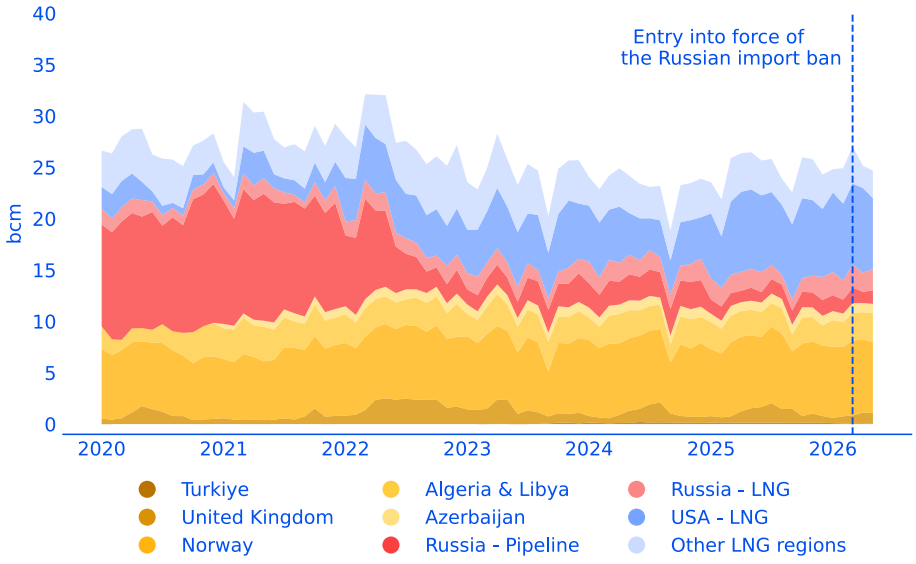
54 The impact of the ban appears limited so far as it has not materially altered supply patterns. Recent market dynamics were more strongly shaped by the decline in Qatari LNG imports following the Strait of Hormuz closure.

55 Both pipeline gas and Russian LNG imports continued to increase during the first five months of 2026. For LNG, the higher year-on-year deliveries would appear to be partly linked to the application of the EU ban on the transhipment of Russian LNG since late March 2025 – prohibiting EU operators from providing reloading and storage services in the EU territory to transfer Russian LNG from one vessel to another to redirect it to non-EU markets, such as Asia. In a context of limited availability of suitable shipping capacity to deliver Russian LNG directly to Asian markets, offtakers may have had less flexibility to redirect contracted volumes outside Europe. This may have contributed to additional Russian LNG deliveries remaining in the EU in 2026 compared with 2025, alongside other factors such as efforts to maximise supply from alternative sources following the closure of the Strait of Hormuz, and the frontloading of deliveries and the maximisation of volumes under existing long-term contracts during the transitional period.

56 Gas imports entering via Türkiye Strandzha 1 route were significantly lower year-on-year (-65%), as from 18 March 2026 non-authorised Russian gas cannot enter the EU. This suggests limited, yet observable, impacts of the Regulation.

iv. Supporting evidence

Figure 12: Monthly gas supply evolution in the EU's natural gas system, January 2020 – May 2026 (bcm).



Source: ACER based on ENTSOG Transparency Platform and ICIS Heren.

A.2. Did the first phase of the Russian gas phase-out lead to a reconfiguration of gas flows?

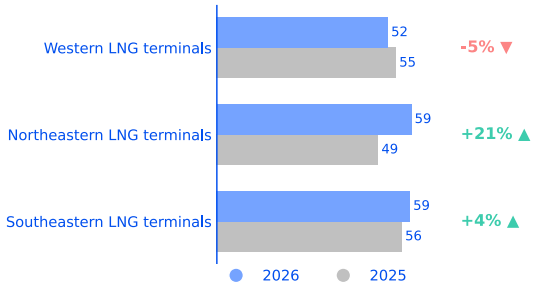
57 **Aim**: this set of indicators assesses year-on-year changes in the utilisation of selected pieces of infrastructure, with a focus on those impacted by the phase out of Russian gas.

58 **Rationale:** show the evolution of gas flows across pieces of infrastructure that are anticipated to be impacted by a changed supply equilibrium. Particularly pipelines enabling alternative non-Russian supply into Eastern Europe, especially in landlocked countries (Hungary and Slovakia) where diversification away from Russian natural gas is more challenging and with the aim to monitor infrastructure adequacy under the changed circumstances.

i. Tracked indicators

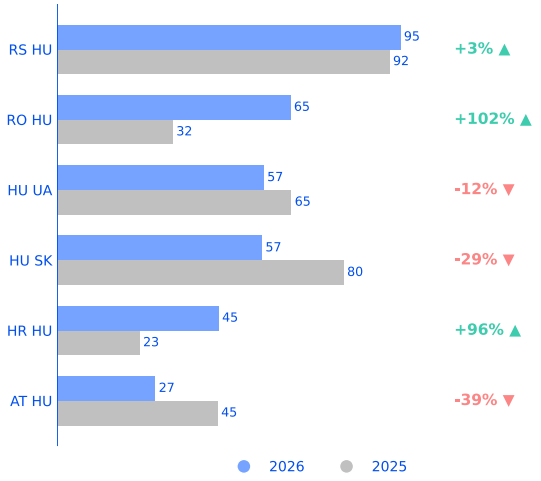
Figure 13: Tracked indicators for the capacity utilisation in LNG terminals and selected Hungarian and Slovak cross-border points (% of capacity).

2.a. Capacity utilisation rate in European LNG terminals



Source: ACER based on ALSI GIE.

2.b. Capacity utilisation rate at selected Hungarian and Slovak cross-border points[28]



Source: ACER based on ENTSOG Transparency Platform.

Temporal Scope: 1 January 2025 – 31 May 2025 vs 1 January 2026 – 31 May 2026.
Member States and borders considered: 2.a. Western LNG terminals include those of Belgium, Spain, France, the Netherlands, and Portugal; Northeastern LNG terminals: Germany, Lithuania, and Poland; Southeastern LNG terminals: Greece, Croatia, and Italy. 2.b. The analysis includes borders with aggregated pipeline utilisation above 10% in 2026.

ii. Observed results

59 Northeastern European countries increasingly rely on LNG since 2022. The highest utilisation levels at LNG terminals were observed in Poland and Lithuania, whose levels remain consistently high across the first half of 2026. Southeastern LNG terminals saw a slight increase in utilisation. In this region, Italy and, especially Greece, have available capacity to bring gas from non-Russian origins.

60 Regarding interconnection point utilisation, the highest absolute utilisation rates across 2026 at EU level are observed on the west-to-east corridors, notably from France to Belgium or from Denmark and Germany to Poland. Large year-on-year increases in utilisation occurred on the

[28] The assessment of interconnection point capacity utilisation is limited to Hungary and Slovakia, given their comparatively higher dependence on Russian gas imports and their landlocked position, which constrains direct access to global LNG markets. In contrast, the remaining EU countries importing Russian natural gas are coastal markets with a higher degree of supply diversification through LNG imports and maritime access to global gas markets. The scope of the next report could be expanded to include additional interconnection points should Hungary and Slovakia diversify their gas supply portfolios towards Central and Northeastern European markets.

Bulgaria–Romania and Romania–Hungary corridors, as well as on certain routes serving Ukraine (see Figure 9).

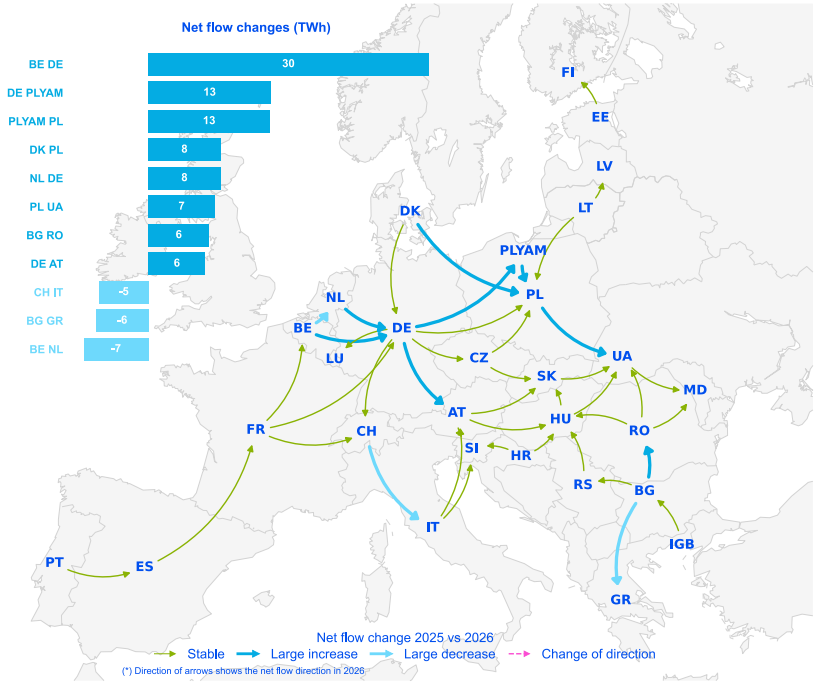
iii. Noticed impacts

61 While some, relatively modest net flow changes can be observed year-on-year compared to 2025 (see Figure 14), broad effects of the Russian gas import ban are not yet visible. Network operation remains broadly consistent with the values observed in 2025 and aligned with the reconfigured flows set by the end of Russian gas transit through Ukraine in January 2025.

62 Physical congestion remains overall limited, although capacity utilisation is already high on certain corridors expected to play an even greater role once Russian supplies will fully phase out (e.g., RO-HU). This highlights the need to prioritise and accelerate selected infrastructure investments and ensure access to them.

iv. Supporting evidence

Figure 14: Changes in net gas flows[29] at cross-border interconnection points, January-May 2025 vs January-May 2026 (TWh).



Source: ACER based on ENTSOG Transparency Platform and JRC (eurogastp Python package).

Note: Net flows that have maintained the same direction are represented by blue or green arrows: dark blue indicates a large increase in net flows (greater than 5 TWh), light blue shows a large decrease in net flows (greater than 5 TWh), and green indicates a stable net flow (change lower than 5 TWh).

[29] Net flows at a certain border are defined as the difference between aggregated physical flows in one direction and those in the opposite direction across all interconnection points at that border. Note also that flows were aggregated at the border level according to the strategies defined in the topology file of the JRC's eurogastp Python package. Flows and capacities associated with low-calorific gas were excluded from the analysis to maintain consistency and focus on interconnection points transporting high calorific gas.

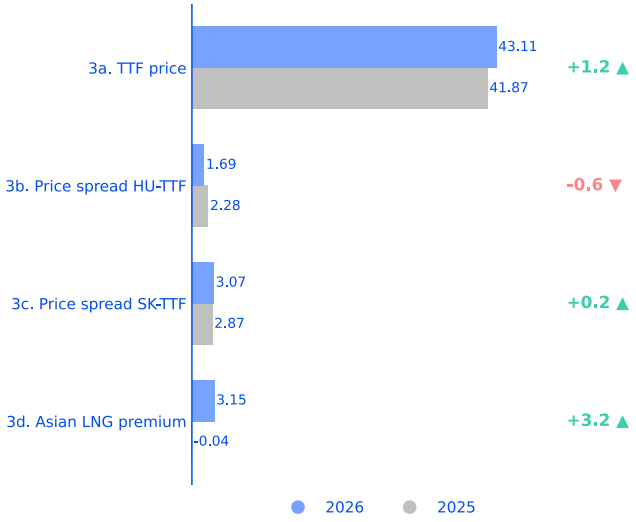
A.3. What are the price impacts of the first phase of the Russian gas phase-out?[30]

63 **Aim**: these indicators measure the recent evolution of EU gas prices following the entry into force of the Russian gas import ban. The analysis focuses on price convergence across regional hubs. In addition, the indicators cover the recent evolution of EU LNG gas prices relative to Asian prices, following the entry into force of the Russian gas import ban, and could be impacted by other geopolitical events, like the closure of the Strait of Hormuz.

64 **Rationale:** a reduction in Russian gas supplies may influence price formation, potentially leading to higher prices at hubs that replace Russian gas with more expensive alternatives. The alternatives may be more expensive due to additional costs associated with sourcing gas from more distant origins, such as higher transportation costs, or by renegotiating contracts under less favourable conditions. Russian pipeline supplies and Russian LNG supplies is anticipated to result in increasing EU LNG imports from non-Russian origin. Hence, the analysis aims to contrast the relative price evolution of global LNG regions to assess if European buyers compete more fiercely to attract LNG volumes of non-Russian origin.

i. Tracked indicators

Figure 15: Tracked indicators of TTF day-ahead price, price spreads at selected hubs, and Asian LNG premium (EUR/MWh).



Source: ACER based on ICIS Heren and REMIT data.

Temporal Scope: 1 January 2025 – 11 June 2025 vs 1 January 2026 – 11 June 2026.
Geographical scope: 3.a. Title Transfer Facility in the Netherlands, 3.b. Hungary, 3.c. Slovakia, 3.d. EU vs Asia.

[30] Technical considerations: Wholesale hub price references are used as the primary indicators for tracking price developments. However, particularly in markets with less liquid trading hubs, these price references may not fully reflect the sourcing costs for the entire market. Bilateral long-term contracts indexed to other hubs or commodity benchmarks may diverge from national hub prices, which in such cases are often used mainly for balancing purposes.

Moreover, while the analysis focuses on wholesale price references, it should be noted that final retail consumers may face relative price deviations that differ from wholesale market outcomes. In turn, LNG price formation results from a combination of contractual supply options. The assessment compares LNG price references for delivery in the subsequent two weeks used as general reference, but actual LNG imports will result from a variety of contractual conditions and origins.

ii. Observed results

65 The coincidence of the Russian import ban with the LNG disruptions caused by the Strait of Hormuz closure does not allow to isolate the ban's effects. EU gas prices rose by over 60% during the initial phase of the Middle East conflict and the subsequent supply shocks, including trade disruptions in the Strait of Hormuz and the damage to the production facilities in Iran, United Arab Emirates, and Qatar. Prices have since stabilised somewhat - with modest, yet visible, drops after the announcement of the cease fire in mid-June 2026 -, but market volatility remains elevated. Future EU price evolution will depend heavily on broader global market dynamics, while the Russian ban's effects may become more visible in relative price differences between European hubs.

66 In recent years, Eastern European hubs have traded at a 1.5–3 EUR/MWh premium to Western hubs, driven by various reasons, including Russian supply disruption and west-to-east LNG flows with higher transportation costs. Since 18 March 2026, no deterioration in hub convergence has been observed; instead, the convergence has slightly improved. Price correlations also remain stable, suggesting normal price formation, though monitoring should continue, including the transmission tariffs, given the intensified global geopolitical context.

iii. Noticed impacts

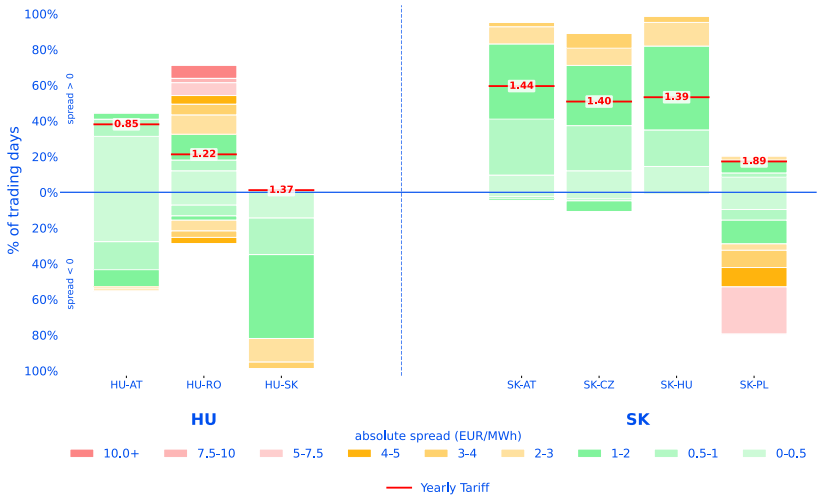
67 Although no clear price impact of the Russian ban on prices can be deducted from the analysis at this stage, the recent price divergence observed in the Baltics and Finland offers a useful cautionary tale. Regional reliance on costlier supply routes can widen spreads, and if coupled with insufficient infrastructure it can lead to partial price decoupling and potential subregional isolation leading to security-of-supply concerns. In this context, the combination of improved interconnection, import capacity, and source diversification may play an important role to reduce exposure to regional isolation and increased market prices.

68 Looking ahead, although not analysed in this report, the loss of Russian imports and subsequent changes of supply patterns will impact the utilisation of transit routes with possible implications on transmission tariffs. This effect has been already observed in Slovakia and Austria, where tariffs have continuously increased since 2022 amid the substantial reduction in Russian transit flow. In other jurisdictions, however, the reconfiguration of supply flows led to increase transmission volumes and booking activity, thereby reducing the upward pressure on tariffs following the loss of Russian supply.[31]

[31] Transmission tariffs are an important reference point in price formation across trading hubs.

iv. Supporting evidence

Figure 16: Day-ahead gas hub price convergence and yearly cross-border transmission tariff, Hungary and Slovakia vs neighbouring countries, 1 January 2026 - 11 June 2026 (% of trading days).



Source: ACER based on REMIT data and ENTSOG Transparency Platform.

Note: Positive spreads mean the second country is trading at a higher price than the reference country. Market liquidity is significantly different across countries which can impact the assessment.

Annex 2. Methodological note on customs data processing

69 Raw datasets often contain inconsistencies, missing observations, anomalous values and measurements reported in different units. Prior to analysis, a structured data-cleaning process was applied to ensure the consistency, comparability and reliability of the dataset. The purpose of this process was not to alter the underlying information, but to address data-quality issues, standardise the data where appropriate, and ensure that all methodological adjustments were transparently documented.

Initial data validation

70 The first step consists of reviewing the raw data to identify potential errors, inconsistencies and gaps. This includes checking for duplicated records, missing values, inconsistent date formats, superfluous repeated digits, incorrect decimal separators and values reported in different units. All observations are assessed against their expected range, historical behaviour and internal consistency. For example, monthly values are compared with annual totals, country-level figures with aggregated totals, and physical quantities with known capacity or operational constraints.

Treatment of outliers

71 Outliers are observations that deviate significantly from the general pattern of the dataset. They may reflect genuine exceptional events, reporting errors, unit-conversion issues, or data-entry mistakes. Consequently, outliers are not removed automatically. Instead, they are systematically identified, reviewed and classified to determine whether they represent valid observations or data quality issues.

72 Outlier detection combines statistical techniques with expert judgement. Statistical methods include the identification of values outside predefined ranges based on the mean or median, interquartile range (IQR) analysis, and z-score thresholds. These methods are complemented by technical and market expertise, for example where reported import volumes exceed technically feasible capacities, exhibit implausible temporal variations, or are inconsistent with other reported information.

73 Where an outlier is confirmed to result from a reporting or data-processing error, every effort is made to identify and correct the underlying cause rather than simply removing the observation. This assessment includes reviewing the consistency of the entire time series and analysing key physical and commercial relationships, such as:

- the ratio between the reported product mass and the declared customs value;
- the relationship between reported mass and energy content; and
- consistency with comparable imports reported by the same importer and from the same origin.

74 The relationship between mass and energy content is particularly important for natural gas and LNG, as the energy content per unit of mass is not constant. It varies according to gas composition, which depends on the producing field, reservoir characteristics and processing conditions. Although all imports considered in this analysis originate from the Russian Federation, differences in calorific value may still exist between supplies from different production fields or export streams.

75 In the limited number of cases where corrections have been required, the revised values have been derived using the energy-to-mass ratio observed for comparable imports reported by the same importer and originating from the same production source or, where this was not possible, from the closest technically comparable imports. This approach preserves the physical consistency of the data while minimising the introduction of artificial assumptions into the dataset.

Treatment of missing data, interpolation and extrapolation

76 Missing values may arise as a result of incomplete reporting, delays in data publication, transmission errors, or differences in reporting frequency between data sources. Where gaps exist in the underlying data, no interpolation or extrapolation has been applied to estimate missing observations. The analysis is based exclusively on the information that had been reported and validated at the time of the assessment.

77 This approach ensures that all results presented in the report are directly supported by observed data and avoids introducing additional uncertainty through statistical estimation techniques. Consequently, periods for which complete data were not yet available are excluded from the analysis rather than supplemented with estimated values.

78 For the analysis of Russian gas imports in 2026, customs declarations accepted during May 2026 had already begun to be received. However, the volume of available declarations was not sufficiently complete or representative of the actual level of imports. This is because customs declarations are typically submitted and accepted with a time lag following the physical import of the gas. Including these incomplete data would therefore have led to an underestimation of import volumes and potentially misleading conclusions.

79 Accordingly, the analysis presented in this report covers customs declarations accepted up to April 2026 only. No interpolation, extrapolation or other estimation techniques have been used to compensate for the incomplete May 2026 dataset. Later reporting periods will be incorporated once the corresponding customs declarations become sufficiently complete and representative.

Conversion of units

80 For natural gas imports, the supplementary unit specified under the Integrated Tariff of the European Union (TARIC) is the energy content expressed in gigajoules (GJ). Consequently, customs declarations contain both the net mass of the imported gas and its corresponding energy content, providing two complementary measures of the same physical quantity.

81 For the purposes of this analysis, all reported energy quantities are converted from gigajoules (GJ) to terawatt-hours (TWh) to ensure consistency throughout the report and facilitate traceability.

82 The conversion is based on the following relationship: $1\ \text{GJ} = 2.77778 \times 10^{-7}\ \text{TWh}$

Quality assurance

83 Once the cleaning process is completed, the dataset is subject to final quality checks. These included verifying totals, comparing cleaned data with previous reporting periods, checking consistency across sources and confirming that no unintended changes have been introduced. The final cleaned dataset is therefore suitable for the analysis while maintaining transparency about the assumptions and adjustments applied.