



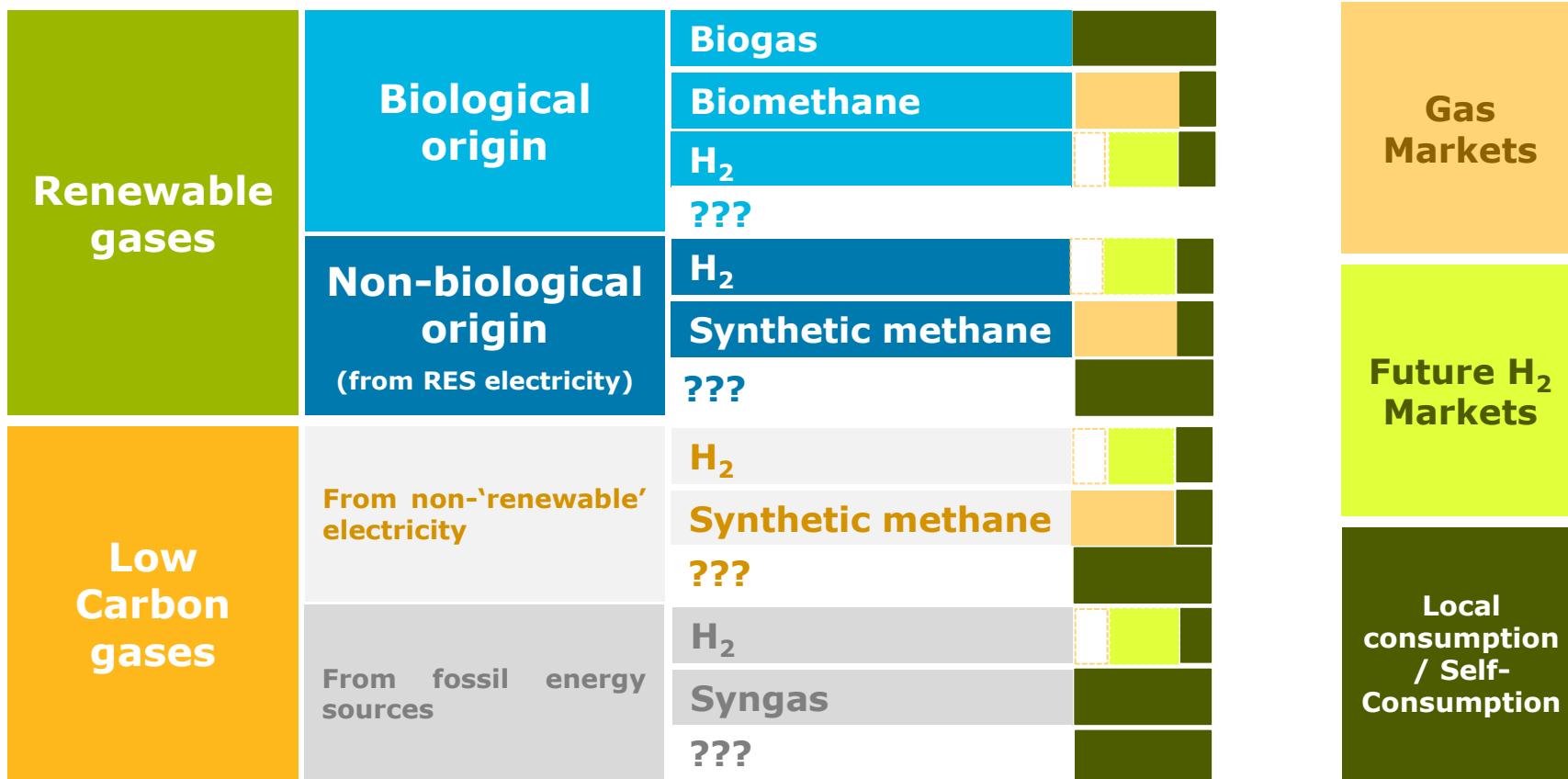
European-wide developments for green-gas certification (GOs)

03/04/2025 - UBA



Renewable* gases in Europe

What are we talking about?



The life cycle of a European renewable molecule



1 Production phase

Producer

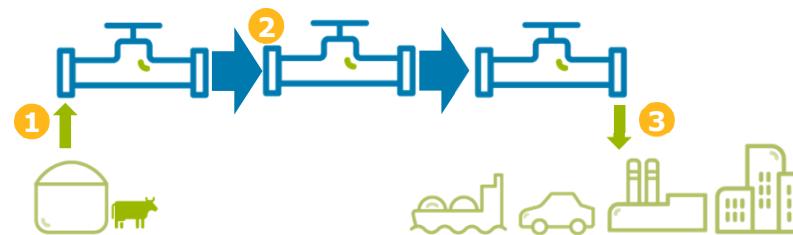
- Subsidies
- Monetization of renewable production

Supplier

- Tariff exemption at the Entry point

Member State

- National production targets
- National consumption targets*



2 Pipeline transport

Supplier

- Tariff exemption at IPs

3 Consumption phase

Supplier

- Disclosure
- Commercial offer
- Transport obligations

Consumer

- Personal/corporate environmental commitment
- Calculation of carbon footprint and CSRD
- ETS reduction
- Transport obligations in maritime transport

Member State

- National consumption targets

➤ One single molecule

➤ Different perspectives

➤ Multiple claims during the different phases of its life cycle

➤ But make sure that it is consumed only once!

Certification of renewable* gases in Europe

A complex framework: The Renewable Energy Directive (RED III)



Article 19

Guarantees of Origin

Disclosure (Consumption claims)

Article 31a

Union
Database
UDB

Articles 26 - 28

Voluntary Schemes *Proofs of Sustainability*

Target accounting

New Gas and Hydrogen package (Directive and Regulation)

Disclosure obligations (on GOs)
Potential use of GOs for low-carbon gases
UDB linked to tariff exemptions at the IPs.

Certificates of Origin

Certification of renewable* gases in Europe

A complex framework: The Renewable Energy Directive (RED III)



Guarantees of Origin (GOs)

- The GO Issuing Body is appointed by the MS
- 1 GO per MWh (measured HCV)
- Tradable certificate. A GO moves between accounts in a Registry.
- Book & Claim – GO can be sold without the commodity
- Cancellation of GOs for consumption claims

Features inherited from the certification of renewable electricity

Proof of Sustainability (PoS)

- Voluntary Schemes Recognized by EUCOM
- 1 PoS per Energy Consignment (measured LCV)
- Not a tradable certificate – an 'attribute' attached to the commodity. A new PoS is issued every time the commodity changes hands.
- Mass Balancing – The attribute follows physically commodity from production to consumption
- The consumer 'holds' the PoS issued by the last supplier. PoSs are not cancelled.

Features inherited from the certification of bioliquids



Union Database

The Union Database



Union Database



- Art.31a allows for direct interaction of EOIs vs. National Database
- Developed (direct interaction) for bioliquids.
- Includes traceability from the sustainable raw materials until consumption.
- Extended to gases in a second phase:
 - Involvement of TSOs/DSOs for injection/withdrawal data
 - LNG to be treated as a liquid not as a gas
 - Requires integration with GO Registries
- Use is mandatory by 21st May 2025... but... REDIII has to be transposed.

A question remains unanswered:

How is the integration of GO Registries with UDB expected to work?

A European Market for renewable* gases

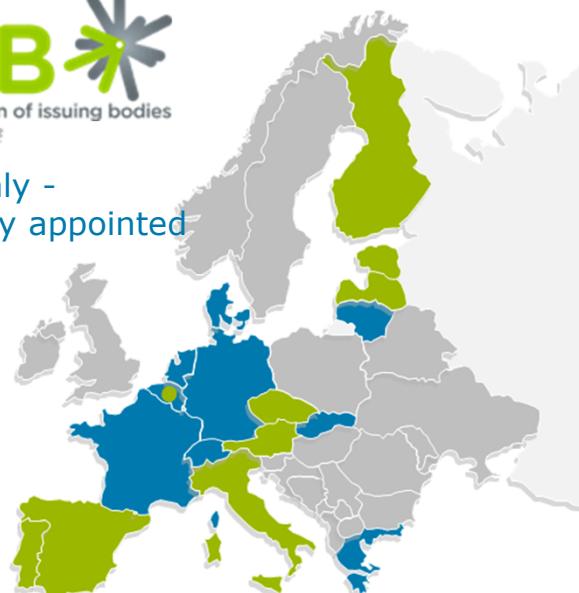
Importing/Exporting of the Renewable* certificates



GOs: DK, NL, IE, SK
+ Certificates of origin



GOs only -
officially appointed
IBs

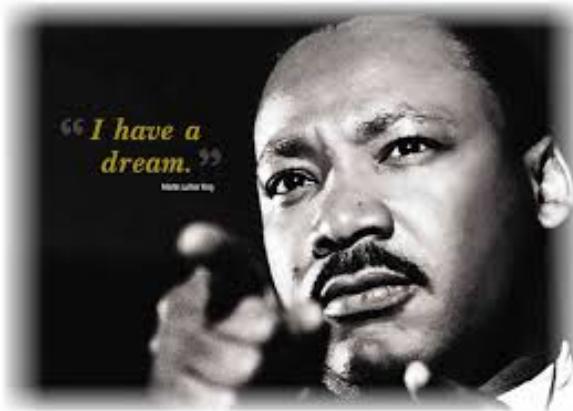


- Increase in the number of GSG Members: facilitating the creation of the renewable gas market:
 - 3 Members 2023 (AT, LV, ES)
 - 9 Members 2024 (+ FI, CZ, IT, BE-Bru, PT, EE)
- Adaptation of EECS rules to the gas specificities
- Facing the challenge: UDB

If we can dream... the ideal situation with UDB



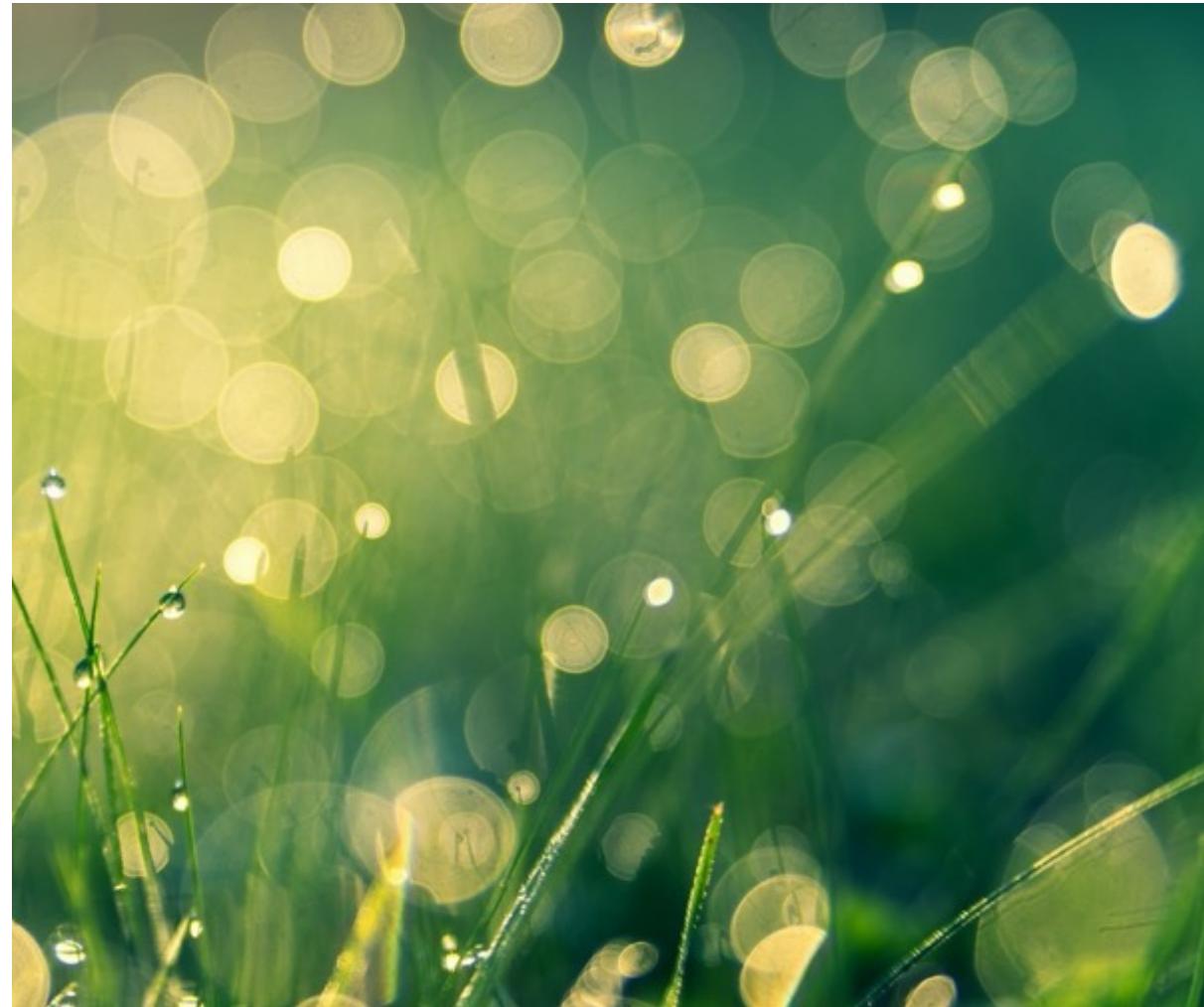
- A single 'multi-purpose' certificate.
- To be used by all involved parties (Producer, Supplier, Consumer & MS)
- Optimizing the information exchange between parties:
 - Minimizing reporting obligations
 - Minimizing conciliation processes (avoiding mismatching)
- Simplifying the operation for producers, suppliers and consumers.
 - Aligning the certification processes with the gas market rules.
 - A functional helpdesk, quick response in national languages.
- Simplifying the processes established by the MS:
 - At the production points – as subsidy management or GO auctions.
 - At the consumption points - statistics or target accounting.
- A robust system: resilient and secure.
- Fraud resistant – facilitating MS their verification role.



IMAGINE

John Lennon

Dankeschön



Key messages

- Renewable gases is a broad term that includes biogas, biomethane, renewable hydrogen and potentially other gases.
- The certification of renewable gases is needed as during the lifecycle of a green-gas molecule, the 'renewable attribute' is claimed several times by several subjects: producer, supplier, consumer, and Member State.
- These multiple claims are totally legitimate, but the certification system has to ensure that the consumption of one renewable molecule is accounted only once.
- The certification framework set by the Renewable Energy Directive for renewable gases is very complex:
 - Article 19 defines a system of Guarantees of Origin for gases for disclosure and consumption claims – as for electricity.
 - Article 25 and 27 defines the certification under voluntary schemes for target compliance – as for bio-liquids, what has derived in the development of Proofs of Sustainability.
 - Article 31a defines the Union Database and requires the integration of GO Registries with UDB.
- Guarantees of Origin and Proofs of Sustainability are very different certificates, both applying to sustainable-renewable gases.
- GOs and PoSs have to be integrated in the UDB:
 - There is a huge uncertainty on how this is to be done.
 - This is expected to be working by 21st May 2025.
- The implementation of UDB is a tremendous challenge and at the same time a great opportunity to simplify and reinforce the certification of renewable gases.