AIB's response to the Call for Evidence launched by the European Commission on "the renewable energy legal framework post-2030"

CONTENT

Note on interpreting this contribution to the call for evidence:

The Association of Issuing Bodies (AIB) is a bottom-up harmonisation initiative of national competent authorities, bringing together 41 issuing bodies for Guarantees of Origin (GOs) in an international nonprofit association. **All AIB members are appointed by their national government to administer a GO system**. They do so in line with Article 19 of Directive (EU) 2018/2001 (as amended by Directive (EU) 2023/2413, "RED").

This document reflects the expert views of AIB as an association, based on its experience in administering the GO system. It does not represent a formal position of individual AIB members. Though members were consulted, not all members were involved in drafting the paper, and not all have competence or decision-making authority on the matters addressed. The views expressed should not be attributed to individual members unless explicitly stated.

1 CONTEXT

The future EU renewable energy framework will operate in a system that is:

- more electrified,
- more cross-sector (electricity, gases, fuels),
- and increasingly reliant on accurate emissions and origin tracking.

At the same time, the current geopolitical context reinforces the need for Europe to be more self-reliant and resilient in its energy system, including transparent and robust tracking of energy sources.

In this context, **credible attribution of energy origin at the point of consumption** becomes a core component of:

- consumer trust,
- investment certainty,
- and an effective decarbonisation policy.

While the **Guarantee of Origin (GO) system** is well established in **electricity** markets, **renewable gases** (biomethane, hydrogen) present additional operational and regulatory complexities. These include:

- physical constraints of gas networks (e.g., blending, storage limitations),
- mass-balance versus book-and-claim interactions,
- and increasing reliance on cross-border infrastructure.

These differences should be explicitly considered when extending GO-based frameworks to gases.

2 CHALLENGE: REGULATORY FRAGMENTATION AND GO INSTRUMENT INTEROPERABILITY

Based on operational experience with the Guarantee of Origin (GO) system across Europe, AIB **observes a growing risk of fragmentation in tracking methodologies across EU legislation and** initiatives. This fragmentation is driven by several factors:

- parallel systems emerging alongside Guarantees of Origin (GOs),
- inconsistent treatment of renewable and low-carbon claims,
- use of average or grid-mix data for specific consumption claims,
- and policy designs that bypass existing tracking infrastructure.

These developments create systemic risks, including:

- double counting of renewable energy attributes, especially cross-border,
- reduced transparency,
- higher administrative complexity,
- and weakened internal market functioning.

A specific and recurring challenge within this discourse is the perceived risk that the GO framework itself could facilitate double counting. Whereas in practice, the GO is a highly effective instrument for *preventing* double counting and ensuring the integrity of renewable energy tracking; however, its full potential is frequently hampered by a lack of coordination between overlapping systems.

The key to unlocking the GO`s full potential lies in accurately and exhaustively aligning the interaction between the GO and other instruments, such the Union Database (UDB), Proofs of Sustainability (PoS), and Power Purchase Agreements (PPA).

To resolve these inconsistencies, future legislation (RED IV) must focus on the harmonisation of these tracking mechanisms to ensure a single, non-redundant accounting framework that provides legal certainty for all market participants across Europe.

3 DESIGN PRINCIPLE

From a system design perspective, the framework would benefit from ensuring:

One coherent, standard-based system for tracking energy origin and associated emissions to the point of consumption.

In practice, the existing GO framework and national GO systems that are based on Article 19 of Directive (EU) 2018/2001 (as amended by Directive (EU) 2023/2413, "RED") and the CEN EN16325 standard, already provide :

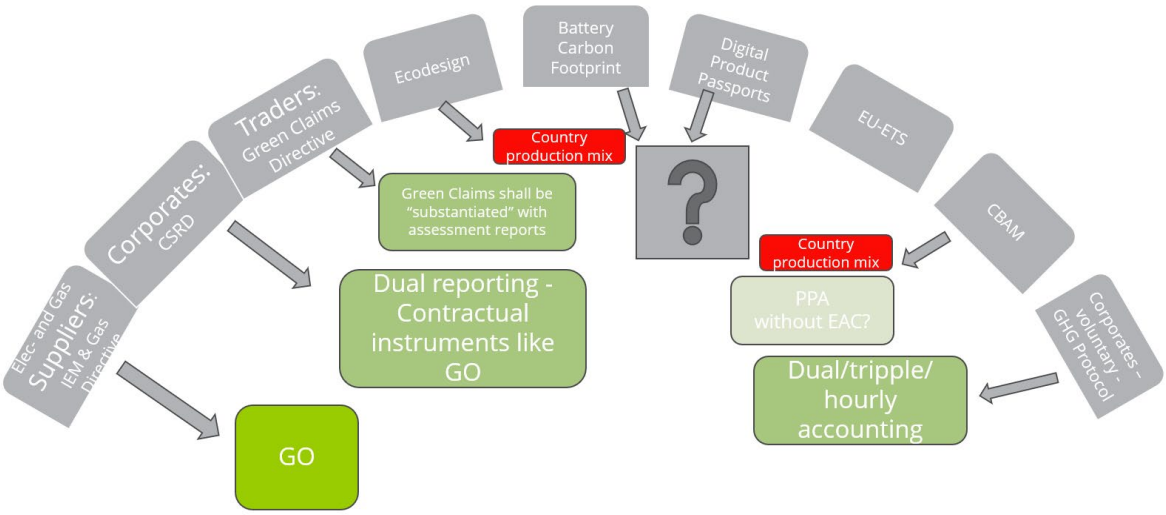
- traceability of unique claims that prevent double counting,
- cross-border interoperability/transfers,
- a mature, registry-based system and audit-based issuance across Europe.
- and a system operated at the national level by competent bodies independent from the market and designated by participating states, within a common European framework.

This is a solid, practical, and scalable basis to build upon.

4 KEY RECOMMENDATIONS

4.1 Ensure the consistency in energy origin claims across different policy areas

We observe a lack of consistency across EU policy frameworks that track emissions or sources of consumed energy. Different mechanisms are used to substantiate claims. This leads to significant fragmentation in how energy origin and emissions are verified for final consumption claims across Europe.



We support the principle that all renewable and low-carbon energy claims must be based on the cancellation of a unique, verifiable tracking instrument that is compliant with CEN EN 16325: the Guarantee of Origin (GO).

This ensures that the ownership of renewable and low-carbon energy attributes is always vested with one single party. Like money resides on a bank account, GOs reside on a governmentally hosted account in a single place. This enables market actors to drive renewable energy production by signaling demand on both the consumer and supplier sides.

As a GO allocates the ownership of environmental attributes of energy to the GO owner, it is inconsistent to claim that a consumer's energy emissions would be the average emissions of the grid or country where they are located. Correspondingly, in our expert opinion, the Residual Mix is the only valid fallback for claiming emissions and origin of energy that is not backed by such a reliable tracking instrument.

Moreover, only in jurisdictions that apply "Full Consumption Disclosure", whereby all energy consumption is also subject to mandatory disclosure via GOs and where GOs are issued also for non-renewable energy, the need for[2] the Residual Mix has become obsolete. We critically question the average country mix or grid-mix data to be used for specific consumption claims or carbon accounting.

This practice undermines the market-based mechanism established under Article 19 of Directive (EU) 2018/2001 (as amended by Directive (EU) 2023/2413, "RED") and creates a "double-claiming" scenario that devalues the renewable claim. This is another example that demonstrates that it is essential to align regulatory instruments to create a stronger ecosystem that effectively prevents double-claiming.

We recommend these specific actions:

Any claim regarding the origin or carbon intensity of consumed energy is substantiated through the cancellation of a standardized, CEN EN16325-compliant GO as the only tracking instrument.

The Residual Mix is the only allowed default means for unaccounted claims of consumed energy. When a GO is not cancelled, the Residual Mix serves as the sole permissible alternative for calculating the origin and emissions of energy. The Residual Mix is and should be recognized as the only statistically valid fallback that prevents double counting of attributes.

The use of average-grid-mix data for attributes of specific consumption claims, or carbon intensity data (RFNBO, Ecodesign Regulation, Digital Product Passport (as part of the ESPR), CBAM, etc.) should be thoroughly assessed to prevent the risk of double counting.

4.2 Keep it simple: ensure consistency across EU legislation by basing all renewable energy consumption claims on Guarantees of Origin

Several areas of EU legislation assess climate impact based on the origin of energy consumed. However, we observe that not all EU-driven initiatives track the origin of this energy in the same manner. This leads to inconsistencies and reduces the overall effectiveness of these measures.

The tracking purpose of "compliance with policy targets" should not exclude the goal of "informing consumers of the origin of their energy (disclosure)". Indeed, when suppliers report for compliance, they still need to prove the renewable origin of their energy supply with GOs if they market it as energy from renewable sources. To address this, aligning different energy attribute tracking systems with the provisions of Article 19 of Directive (EU) 2018/2001 (as amended by Directive (EU) 2023/2413, "RED") will help create a cohesive and efficient framework for energy certification. This would promote consistency across different energy carriers and technologies. The GO system, implemented by 41 government-appointed issuing bodies under the EECS framework, already provides a standardized and reliable model for this alignment.

The requirement placed on Member States (MS) by RED Article 19 to prevent double claiming, together with the requirement to issue GOs that can be freely traded once issued, makes it problematic to use other methods besides GOs to claim the renewable value of a portion of energy. This fact implies that to enhance transparency and consumer trust, all claims regarding renewable energy consumption should be substantiated by GOs.

We encourage EU policies (including reporting frameworks) to avoid parallel or competing tracking approaches.

Where energy origin or emissions are tracked, we support that this relies on a harmonized, standard-based system, ensuring consistency across instruments and sectors.

Currently, there is a lack of methodological rigor in the Corporate Sustainability Reporting Directive (CSRD/ESRS) framework regarding verification of energy origin. Specifically, the wording in ESRS E1 (referencing "contractual instruments like GOs or other alternatives") creates legal ambiguity.

We recommend these specific actions:

In CSRD – ESRS[1] E1.5, replace "contractual mechanisms" and "market instruments like GOs" with an unambiguous requirement for "CEN-compliant GOs or a tracking instrument that meets equivalent standards of reliability to those defined in CEN EN16325."

Ensure that the instruments imposed by the RED Article 19 are consistently used in all policies that consider the environmental benefits of the attributes of consumed energy:

For renewable and low-carbon gases, we recommend exploring options to further the integration of PoS and the GO into a single, flexible, tradable instrument. By that, the Commissions is advancing to safeguard the ownership of the represented attributes is vested with a single party at any moment in time. This creates a single, streamlined evidence chain that satisfies both energy tracking and sustainability criteria (such as those required for RFNBOs), reducing administrative burdens.

For renewable and low-carbon gases, maintain the GO as the exclusive legal instrument to prove ownership of the attributes of energy. Using GOs to trade renewable and low-carbon attributes between producer and consumer, safeguards unique claims along the "chain of custody".

For renewable and low-carbon gases, enable the application of GOs within mass-balance methodologies where required for specific policy compliance.

4.3 Back temporal correlation requirements and renewable PPAs with Guarantees of Origin (GO)

We applaud the proven effectiveness and growing implementation of renewable Power Purchase Agreements (PPAs) in driving new renewable capacity and providing long-term investment signals. However, to ensure market integrity, AIB advises the Commission to require renewable energy claims under a PPA to be backed with Guarantees of Origin (GO).

We observe that the transition toward more precise carbon accounting requires a framework capable of supporting increased temporal granularity (e.g., shifting to sub-hourly matching of energy consumption with renewable energy production).

However, we note that current policy trends often favour bilateral, PPA-based arrangements for temporally matched renewable / low-carbon electricity consumption, without explicitly requiring

[1] DELEGATED REGULATION (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU as regards sustainability reporting standards https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02023R2772-20250101

verification via GOs. Relying solely on these “closed-loop” bilateral systems risks double counting and fragmenting the market. Hourly matched PPAs without backing by GOs risk double counting if the underlying attributes are sold elsewhere, thereby invalidating the efforts of all involved tracking systems.

Further, restricting consumers to a single PPA counterparty can inflate costs because they cannot hedge intermittency across a diverse portfolio.

We recommend these specific actions:

In policy areas where hourly matching is required (to match production with consumption at (sub-)hourly level), we recommend the use of GOs to be mandated as the primary tracking mechanism to prove the renewable energy source, just like for any other granularity of claims.

This will enhance market liquidity beyond solely relying on bilateral PPA restrictions, within the geography foreseen by the relevant policy.

This approach also responds to the demand for system flexibility, allowing a broader group of market participants to contribute to and benefit from 24/7 low-carbon energy tracking.

4.4 Back geographical correlation requirements with Guarantees of Origin

We observe an emerging regulatory shift in which new, specific policies increasingly view broad system boundaries as too wide for localized requirements.

In some cases, we observe a tendency to bypass the GO system entirely in favor of bilateral physical PPAs or location-based accounting methods without a direct link to a corresponding Guarantee of Origin (GO) that proves the origin of energy (RFNBO Delegated Act, CBAM Implementing Regulation). We caution that skipping the established GO framework in favor of private contracts between a single producer and a single consumer significantly increases the risk of double counting and market opacity.

Among the details included on a GO is the location of the production device which generated the energy to which it relates. Where necessary, this information can be used to verify criteria that limit the geographical boundaries within which the relevant GO can be used, while preventing double counting. Thus, this is highly preferable over the creation of fragmented, parallel tracking methods.

Where policy-specific geographical or other usage system boundaries are required, we encourage these to be implemented within the GO framework, avoiding the need for parallel systems.

We recommend this specific action:

Where the Commission defines "usage boundaries" regarding renewable energy, we recommend doing so within the existing GO framework rather than bypassing the GO system in favor of bilateral physical PPAs without GOs. The GO system can be used within closer

system boundaries if required for specific policies. Where policies require proof through PPAs, we recommend that these are backed up with corresponding GOs.

4.5 Preserve cross-border coherence and avoid fragmentation

We observe that the existing standardized facilitation of cross-border transfer of GOs is a key strength, and we support it being preserved. The standardized implementation of GOs ensures both reliability and efficiency of the cross-border transfer system.

However, where physical renewable imports into the EU single market take place, the current Article 19.11 Article 19 of Directive (EU) 2018/2001 (as amended by Directive (EU) 2023/2413, "RED") does not allow for GOs to be imported together with the respective renewable energy from third countries, unless there is a mutual recognition agreement between the European Commission and the exporting country. CBAM requires proof by PPAs without requiring proof of ownership of the renewable attributes through GOs.

For third countries that have a GO system in place and that export renewable energy into the EU, this risks that corresponding GOs would be transferred elsewhere, while registering the energy as renewable in the EU (e.g., under CBAM rules).

For imported energy, whether this is renewable electricity, biomethane, or hydrogen, we support the recognition of standard-compliant tracking instruments to avoid double counting outside the EU.

We recommend these specific actions:

We recommend that the Commission extends the principles of RED Article 19.11 by requiring that physical imports of renewable energy (electricity, biomethane, or hydrogen) from third countries be accompanied by the cancellation of a tracking instrument that meets equivalent standards of reliability to those defined in CEN EN16325, where they exist.

We suggest that the Commission establishes compliance with the CEN EN16325 standard as a mandatory condition for the recognition of foreign (non-EU/EEA) GOs. While the CEN EN16325 standard is only legally mandatory within the EU-EEA, it represents the global benchmark for reliability and anti-fraud protection. This protects European producers from unfair competition by substandard or unverified foreign tracking instruments.

4.6 Interoperable data registration frameworks (Union Database)

We observe significant technical and regulatory challenges remaining in the implementation of Article 31a (4) of Directive (EU) 2018/2001 (as amended by Directive (EU) 2023/2413, "RED"). More specifically, there are challenges regarding the interaction between the Union Database for liquid and gaseous renewable and recycled carbon fuels (UDB) and the system of Guarantees of Origin (GO).

We support the aim that consumption claims at the consumption point are consistently backed by both the Proof of Sustainability (PoS) criteria compliance AND the GO as proof of ownership of these environmental attributes. However, the parallel coexistence of EU and national data registration frameworks, each regulating the activities of Economic Operators and Certification Bodies, creates technical interoperability challenges.

Such challenges relate to:

1) Legal proof of ownership: Member States' (MS) GO registries serve as the legal evidence of an Economic Operator's (EO) ownership of immaterial goods that can be traded. While RED Article 31a (4) forbids transferring a GO outside of the UDB once a consignment of renewable gas is registered in the UDB, the UDB is currently not designed to facilitate the legal transfer of title between the EOs. This creates regulatory ambiguity: It is unclear how the UDB interacts with (national or EU) trade and property laws, governing the ownership and sale of these assets.
2) While it is the MS's obligation to ensure that the same unit of energy from renewable sources is considered only once (RED Article 19.2), they are no longer holding controls for executing these responsibilities after having transferred the GO to the UDB. It is unclear how the related liabilities are taken over by the UDB, while MS shall supervise that suppliers submit GOs upon supply of electricity or gas from renewable sources (Annex 1.5 of Directive (EU) 2019/944 of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU, Annex 1.5 of Directive (EU) 2024/1788 of 13 June 2024 on common rules for the internal markets for renewable gas, natural gas and hydrogen, amending Directive (EU) 2023/1791 and repealing Directive 2009/73/EC).
3) Energy quantities represented in the GO may not equal those of a PoS for the same quantity of energy production due to:
    a. One system validating energy sources, while the other one validating emission savings.
    b. The calorific value used to determine a MWh of renewable gas in the GO framework and in the calculations leading to a PoS. The choice between representing energy content based on Higher Heating Value or Lower Heating Value is to be made consistently, while keeping in mind market practices in the gas sector on the one hand, yet realism in representing the amount of energy recoverable from gas combustion (as heat in chimney gas is often not recovered to the point of condensing its water content).
4) Timelines for issuing GOs and PoS in the current legal framework are often not well aligned.
5) Error-correction processes between GO and PoS in the current legal framework lead to interoperability challenges. Also, there is a need for clear responsibility for error correction in the UDB.

6) While preventing reporting errors and frauds is already an intense task at MS level, identifying and preventing such in the UDB and in the potentially unidentified dual presence of the same production device gets harder when managed at EU central level.

7) The technical interoperability required to synchronize EU centralized data with national registries presents significant hurdles. Harmonizing data for use within diverse national (energy) policy frameworks and national IT databases remains a complex challenge.

While the GO system design enables using GOs in a book-and-claim way within controlled boundaries that include supervision of claims, it doesn't oppose using GOs in a mass-balancing tracking mechanism. For gases transferred between EOs within the interconnected gas network, transferring GOs together with the gas complies with the mass-balancing definition in law while also ensuring that the renewable characteristics of this gas are not double-claimed.

We recommend these specific actions:

We recommend an integral framework design of tracking renewable gases towards a consumption point, where tracking for multiple purposes comes together.

Rather than developing separate tracking frameworks (PoS vs GOs) for separate purposes that need subsequent linking in IT systems that operate in completely different modes, enable the development of an integrated tracking framework design that tackles the operational challenges at the design.

We also recommend enabling the usage of GOs more explicitly in a mass-balancing way for the cases where needed for policy target compliance.

4.7 Registry access to Guarantees of Origin

While the robustness of Guarantees of Origin (GO) is well standardized through EECS and CEN-EN 16325, we observe that market access to GOs remains fragmented throughout diverse national implementation. Specifically, the criteria for who is entitled to hold a GO account within a registry and who owns the right to cancel GOs vary significantly between Member States (MS).

The AIB identifies this regulatory diversity as the root cause of the phenomenon of "hidden ex-domain cancellations" (Hidden EDC). This occurs when a market participant cancels a GO in one domain but uses that cancellation statement to disclose energy origin in a different domain, often without the knowledge of the relevant issuing bodies. This practice directly contravenes the core principle of the EECS and CEN-EN 16325 standards: GOs must be cancelled in the registry of the country where the energy is consumed.

Under the Corporate Sustainability Reporting Directive (CSRD), corporations are increasingly required to provide robust proof of their renewable energy consumption. However, several MS prohibit non-suppliers (corporates) from either holding GO accounts or from cancelling GOs.

This creates ambiguity: On one hand, the GO system is the mandatory instrument for disclosing the origin of energy and preventing double counting. On the other hand, in some countries, the actors responsible for these claims (corporates) are denied the technical means to cancel these GOs within the national registry where the consumption occurs.

Faced with this barrier, market actors may resort to bypassing the rules of the mandatory GO standard, while attributing that volume to their consumption in a restricted domain, to satisfy emission reporting standards. This (illegal but hard to detect) bypassing method of hidden EDC is clearly against GO standards and would benefit from a European solution that aligns the access of market actors to the GO system in the different MS.

Hidden EDC undermines the integrity of the GO system and the goal of the relevant EU legislation, by distorting national residual mix calculations and creating a high risk of double counting, as the same green attribute is effectively claimed in two different domains.

A primary reason for MS who restrict GO cancellation rights to licensed suppliers lies in the structure of energy regulation. National Regulatory Authorities (NRAs) typically have a legal mandate to supervise and sanction licensed electricity suppliers but often lack equivalent mandates for corporate end-users.

We perceive restricting GO market access to be an ineffective tool to solve this supervision handicap. National residual mix calculations become incorrect because the cancelled volumes are not visible to the authority of the consumption domain. The energy origin is effectively counted twice: once in the cancelling domain's statistics and once in the consuming domain's voluntary or mandatory reporting.

Overall, we observe the result to be an unlevel playing field across Europe where the "effectiveness" of a GO depends on the corporation's geographic location rather than the standardized attributes of the GO. This creates a fragmented internal market where the utility of the GO as a disclosure tool is determined by national administrative barriers rather than the technical integrity of the certificate itself.

We recommend these specific actions:

We recommend consistent regulation and supervision of claims of renewable energy consumption and supply across all types of economic actors. To achieve this, AIB proposes the following:

Future legislation (RED IV) should establish common EU rules for the type of entities entitled to hold and cancel GOs. National restrictions that limit account ownership exclusively to licensed suppliers should be removed to ensure all market participants can cancel GOs in the domain of actual consumption.

Harmonizing the "who can cancel GOs" (account holders) will prevent the fragmentation that currently leads to "hidden" market behaviors, such as "hidden ex domain cancellations".

Instead of restricting access, we recommend that Member States empower regulatory authorities to supervise corporate claims directly and within the GO system.

Thus, we encourage the Commission to develop a framework that increases the engagement of disclosure bodies in a harmonized oversight system, ensuring that national statistics reflect all cancellations accurately, whether by suppliers or corporates.

4.8 Temporal matching

Market effectiveness depends not only on who can access the system but also on the temporal rules that govern how certificates are matched to consumption.

While cross-border trust in Guarantees of Origin (GO) is well standardized through EECS and CEN-EN 16325, we observe that national implementation remains fragmented regarding matching production and consumption periods. To strengthen the internal market under future EU energy legislation (RED IV), AIB recommends developing common, harmonized rules for temporal matching.

The current legislative framework, primarily Article 19 of Directive (EU) 2018/2001 (as amended by Directive (EU) 2023/2413, "RED"), establishes the technical requirements for GOs. Specifically, Article 19(9) stipulates that a GO is valid for transfer for 12 months and for cancellation up to 18 months after the production of the relevant energy unit. In addition, in the national disclosure rules of various Member States (MS), there are requirements stating the energy for which a GO is cancelled must be consumed in the same period as the energy for which this GO is produced. In several countries, this temporal matching requirement takes place at an annual or monthly level, while other countries do not have such a requirement at all.

Further, in some areas, the regulatory landscape is shifting toward higher granularity via sector-specific legislation. Most notably, Commission Delegated Regulation (EU) 2023/1184 (supplementing RED II) introduces strict "temporal correlation" requirements for Renewable Fuels of Non-Biological Origin (RFNBOs). Under Article 6 of this Delegated Regulation, the matching requirement for renewable hydrogen production is set to transition from a monthly basis to an hourly basis by January 1, 2030. Also, in some national, sector-specific regulations like those for large energy users like data centres, (sub)hourly matching requirements emerge.

AIB observes that a "multi-speed" implementation of temporal matching is impacting the broader GO market.

Furthermore, a certificate issued in an "annual" domain may lack the granular temporal metadata (timestamping) required for recognition in a "granular" domain, effectively creating technical barriers to trade and violating the principle of the Single Market.

AIB recognizes the discourse surrounding granular certificates and hourly matching, particularly in specialized sectors such as renewable hydrogen production. However, moving toward higher granularity (e.g., hourly matching) benefits from a standardized EU-wide approach rather than divergent national mandates.

Uncoordinated shifts toward hourly matching risk fragmenting the market and complicating the calculation of national residual mixes. We recommend that any evolution toward sub-annual

matching remains interoperable with the existing GO framework to maintain a single, transparent tracking system.

We note that any requirements on granularity benefit from governance at the level of EU legislation rather than divergent national mandates.

We recommend these specific actions:
We recommend that the Commission establish a uniform temporal baseline between production and consumption of energy with specified characteristics. It would allow certificates to be traded and cancelled across borders without being blocked by conflicting national time-stamping requirements.

It also creates more clarity towards market actors on available market volumes that impact GO prices, which are subject to the mechanism of demand and supply.

4.9 Observation on Disclosure Supervision

Whereas the Internal Energy Market Directive Annex 1.5 and the Gas Directive Annex 1.5 require that Member States (MS) supervise suppliers on their obligation to cancel GOs to prove the supply of renewable electricity and gases, AIB observes that the organisations executing this mandate across the MS often differ in the methodology for doing so and the detailed requirements related to such proof.

The Commission could consider opening a discussion on a pan-European coordination initiative for national supervisory authorities that are appointed as competent bodies for disclosure, in line with the CEER Advice on Trustworthy Green Offers (2023)[2].

5 MORE FACTS AND FIGURES - AIB AND THE SYSTEM OF GUARANTEES OF ORIGIN

Guarantees of Origin (GO) have the purpose of proving to a final customer that a given share or quantity of energy was produced from renewable or other sources. Since the introduction of the GO in the first RED Directive 2001/77/EC of 27 September 2001 on the Promotion of Electricity Produced from Renewable Energy Sources in the Internal Electricity Market, the GO system has been implemented in 36 European countries.

AIB is a bottom-up harmonisation initiative of national competent authorities, bringing together 41 issuing bodies for GOs in an international nonprofit association.[3]

[2] CEER Guidelines of Good Practice on Trustworthy Green Offers and Consumer Protection Against Misleading Marketing Practices, https://www.ceer.eu/publication/guidelines-of-good-practice-on-trustworthy-green-offers-and-consumer-protection-against-misleading-marketing-practices/

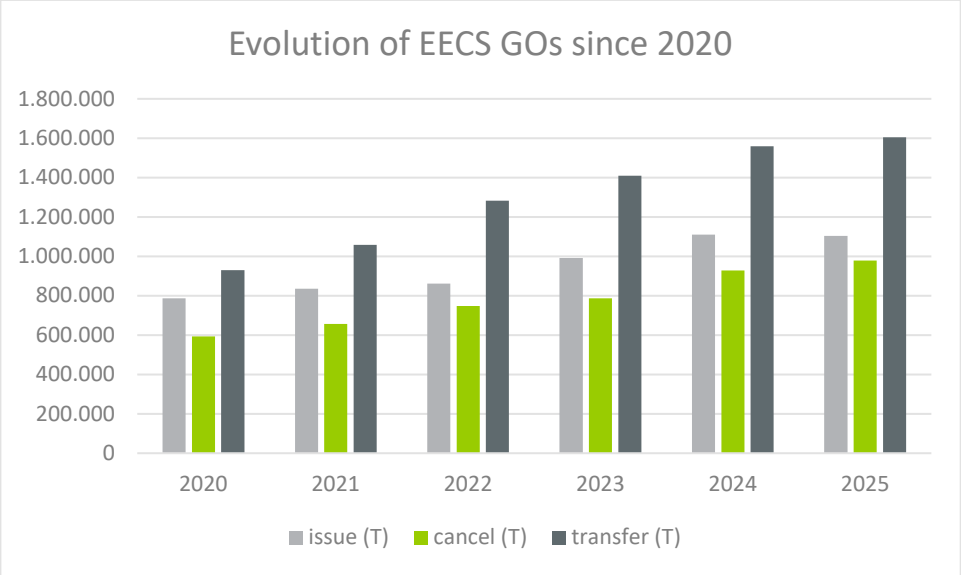
[3] Association of Issuing Bodies (AIB), "AIB Member Countries and Regions," [Online]. Available at: https://www.aib-net.org/facts/aib-member-countries-regions [Accessed 24 March 2026].

All AIB members are appointed by their national government to administer a GO system in line with Article 19 of Directive (EU) 2018/2001 (as amended by Directive (EU) 2023/2413, "RED").

Over the past 24 years, the AIB members have jointly and voluntarily standardised the GO system. AIB also operates a quality assurance system of audits and reviews to guarantee the robustness and reliability.

All members operate a national GO registry for electricity and/or gases, with over 23.000 registered account holders, that are made up of energy producers, suppliers, large consumers, and intermediaries. All GO registries are connected to the AIB Hub, which is a one-to-all IT connection platform for facilitating cross-border GO transfers, fraud checks, and statistical data collection.

Since 2020, GO issuance has risen 40% from 786.856 TWh to 1.103.354 TWh.



[4]

GOs are traded between producers on one hand and suppliers and consumers on the other hand, often through intermediaries. There is no fixed price for a GO, and its value depends on market demand. The annual current market for GOs is valued at several billion euros.

GOs also underpin most Power Purchase Agreements (PPA) and thus play a role in new investments of renewable energy. The instrument is widely used by large consumers for reporting Scope 2 emissions under the Greenhouse Gas Protocol, RE100, and other reporting standards.

[4] Association of Issuing Bodies (AIB), AIB Hub Transaction Statistics, internal database accessed 24 March 2026.

6 CONCLUSION: DON'T SKIP THE GO. BUILD ON IT!

This contribution outlines technical and regulatory considerations necessary for a coherent European framework to track energy origin and associated emissions to the point of consumption.

Operational experience shows that fragmented or parallel tracking approaches:

- Create systemic risks of inconsistency and double counting;
- Undermine cross-border market integrity;
- Increase administrative complexity for market participants and (national) authorities.

Don't skip the GO, build on it!

A harmonized, standard-based approach, centered on the Guarantee of Origin (GO), ensures consistent application across legislative frameworks and enables efficient implementation by Member States. It provides the only robust, existing basis for evolving energy attribute tracking and disclosure requirements.

AIB supports the evolution of the existing GO framework - rather than introducing redundant parallel systems - utilizing a single, interoperable tracking system across all energy carriers, uses proven infrastructure, and avoids unnecessary financial and administrative burdens on issuing bodies and market participants alike.

These elements are critical for the assessment of future policy options,
particularly regarding feasibility, legal consistency, and administrative practicality.

For more information, please contact info@aib-net.org
Association of Issuing Bodies, 15 April 2026