Linking Guarantees of Origin and the Union Database

Scenarios and reflections

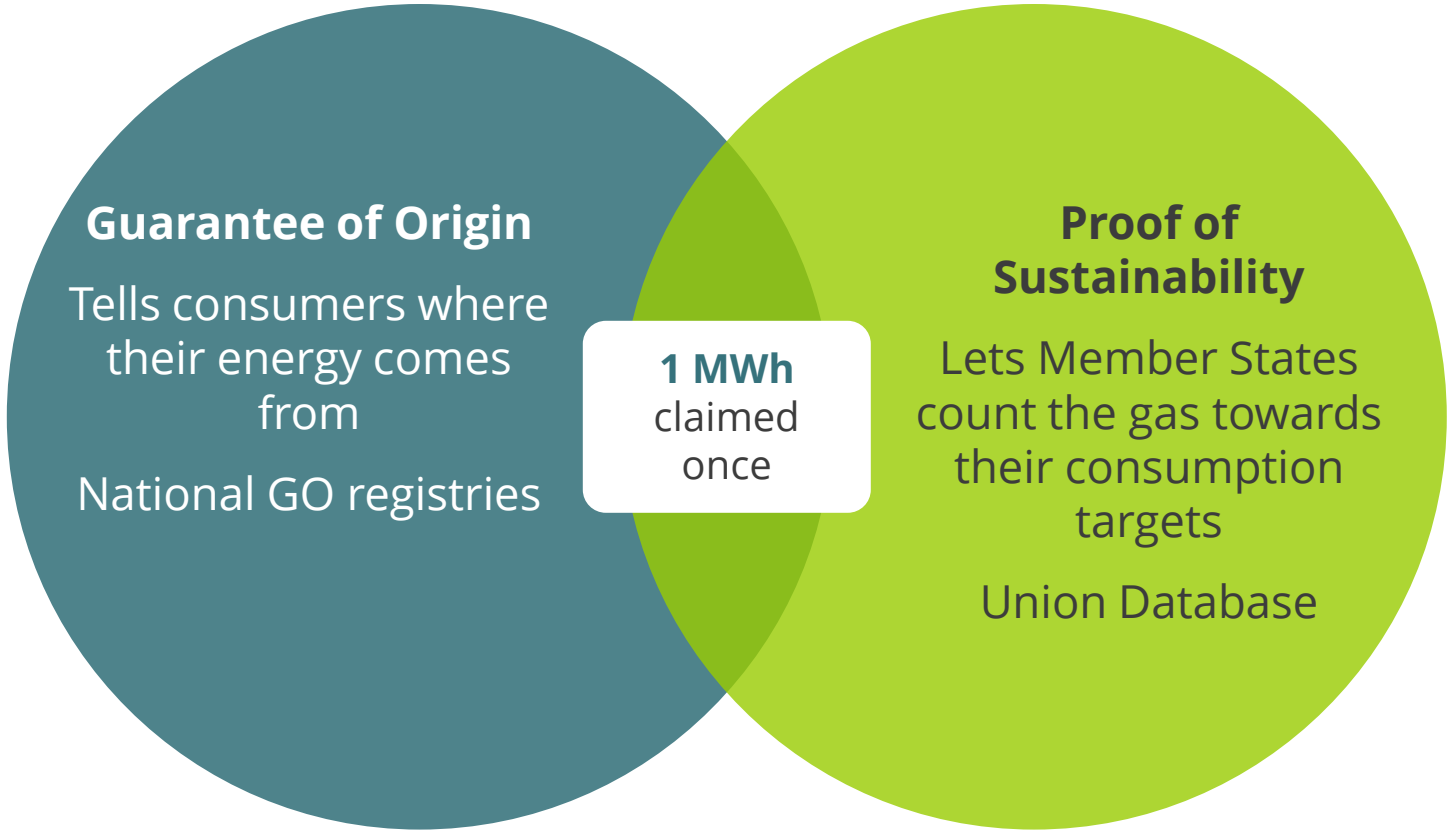
AIB | November 2026



This presentation reflects AIB's expert views as an association, informed by its experience in administering GO systems and consultation with its members. It does not represent the formal position of any individual AIB member, as not all members have competence or decision-making authority on the matters addressed.

One unit of renewable gas, two public purposes

Both are needed – the same MWh may only be claimed once



RED Art. 19 and Gas Directive Annex I(5) for disclosure · RED Art. 3, 25, 29–31a for targets and sustainability

Source: AIB, “Linking Guarantees of Origin and the Union Database – design follows responsibility”, November 2026, and AIB-2026-GSG-09-02

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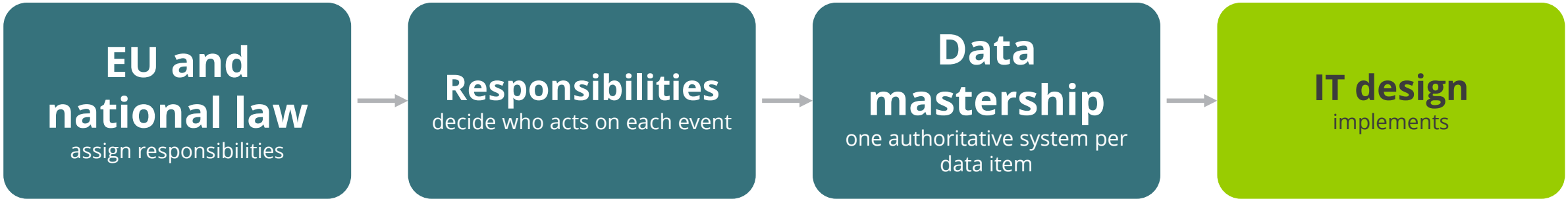
Design follows responsibility

The question is less about technology than about who is responsible for what



Software can route, copy and validate data.
It cannot create or move public authority.

Source: AIB, “Linking Guarantees of Origin and the Union Database – design follows responsibility”, November 2026, and AIB-2026-GSG-09-02

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A system that works – and is scaling up

Interconnected national gas GO registries, harmonised under EECS and EN 16325

Account to account GOs move between economic operators – within one registry or across borders via the AIB Hub

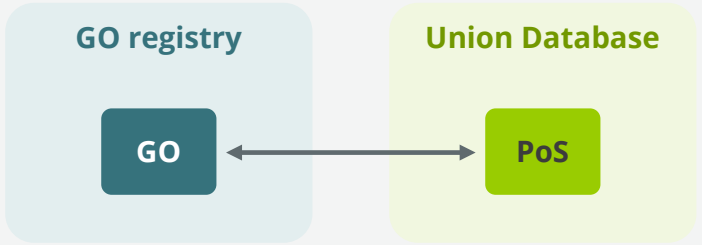
Under supervision Member States oversee issuance, transfer, cancellation and the supplier's claim

Growing more registries connecting as cross-border renewable-gas trade takes off

Three ways to link the GO and the Union Database

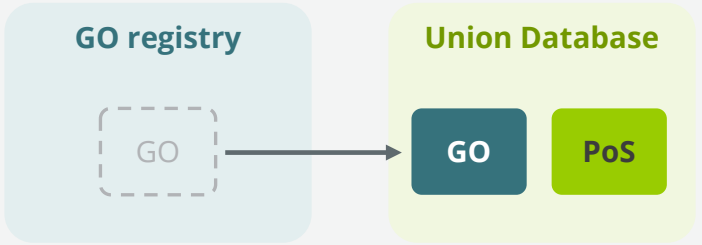
The scenarios differ in one thing above all: where the live GO sits after issuance

A Linked custody



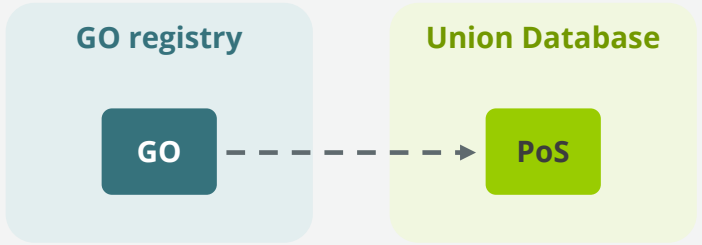
The GO stays in the national registry and is linked to the Union Database throughout its life

B Transfer to the Union Database



The GO moves into the Union Database from registration until cancellation

C Link at cancellation



The GO stays in the national registry; the link is confirmed when it is cancelled

Source: AIB, “Linking Guarantees of Origin and the Union Database – design follows responsibility”, November 2026, and AIB-2026-GSG-09-02

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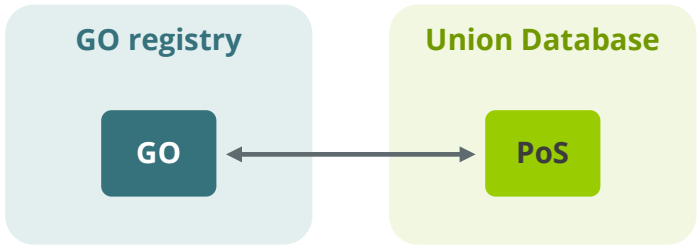
Scenario A – closest to the law, hardest to build

It keeps responsibilities where the Directive places them today, at the cost of complexity

A



What speaks for it

- GO custody stays with Member States and their issuing bodies
- Each system remains master of its own data
- Fits the existing chain of supervision and disclosure

What to weigh

- Continuous synchronisation between every registry and the Union Database
- Highest build and running effort – and a longer lead time
- Needs legal clarity on what “transfer” means

Lighter variant: data exchanged only at key moments – issuance, transfer, cancellation – carried on an enriched EECS gas GO (A2).

Source: AIB, “Linking Guarantees of Origin and the Union Database – design follows responsibility”, November 2026, and AIB-2026-GSG-09-02

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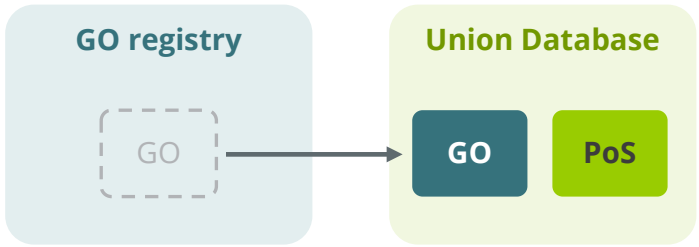
Scenario B – simple centrally, custody without guardians

It follows the letter of Article 31a(4), but moves the GO away from those who remain responsible for it

B



What speaks for it

- One central place for GO and PoS
- Literal reading of Article 31a(4)
- Little build effort for national registries

What to weigh

- Member States stay responsible for GOs they no longer control
- No clear guardian for supervision, corrections and fraud response
- National policy tools lose their link to the GO
- A new custody route, just as the harmonised network scales up

Note: it would also rule out a national database holding the same GO, and shifts complexity to the centre rather than removing it.

Source: AIB, “Linking Guarantees of Origin and the Union Database – design follows responsibility”, November 2026, and AIB-2026-GSG-09-02

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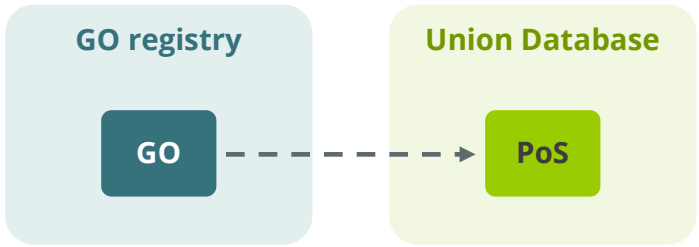
Scenario C – fastest to roll out, but errors surface late

It builds on what works today and keeps responsibilities in place, with one link at the end of the GO's life

C



What speaks for it

- Simplest and fastest to implement
- Builds on the existing registry network and responsibilities
- Smallest IT change for issuing bodies
- The logical pathway for National Databases with GO-Plus-PoS

What to weigh

- The GO–PoS match is confirmed only at cancellation
- Mismatches are found late, when correction is hardest
- Departs from the timing set in Article 31a(4)

With a national database: where a Member State integrates GO and PoS reporting (Art. 31a(5)), data flow instantly and errors surface earlier.

Source: AIB, "Linking Guarantees of Origin and the Union Database – design follows responsibility", November 2026, and AIB-2026-GSG-09-02

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Every scenario has a price

An indicative, qualitative reading of the AIB analysis

	A	B	C
Fit with today's allocation of responsibilities	●●●	●○○	●●●
Fit with the timing of Article 31a(4)	●●○	●●●	●○○
Ease of implementation	●○○	●●○	●●●
Speed of roll-out	●○○	●○○	●●●
Early detection of errors	●●●	●●○	●○○
Member States' control over their own responsibilities	●●●	●○○	●●●

●●● strong ●○○ weak – relative ratings, not scores; each scenario also has variants

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Looking ahead

Practical steps now – a more integrated answer in the next Renewable Energy Directive

Now: within REDIII

Clarify what “transfer” to the Union Database means

Set out which system is master of which data

Phase in the link: a common baseline for all, a national-database route, a simple first stage

Next: RED IV and the post-2030 framework

A more integrated GO–PoS design

A clear allocation of responsibilities between EU and national levels

Decided explicitly by legislators – not implicitly through database design

Source: AIB, “Linking Guarantees of Origin and the Union Database – design follows responsibility”, November 2026, and AIB-2026-GSG-09-02

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AIB is here to help find the way

Issuing bodies bring more than two decades of experience in running reliable, interconnected GO registries.

AIB is ready to work with the Commission, Member States and the Union Database team to design, test and phase in a connection that works for all.

Strengthening the GO and linking it cleanly is the fastest route to a cross-border renewable-gas market without double claims.

Contact us



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