AIB's Reflection Paper On the Renewable Energy framework Post 2030

September 2026

association of issuing bodies

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.

Choices for a coherent post-2030 framework

Association-level reflections; not attributed to individual members

1. One single instrument for renewable attribute ownership

2. GO and PoS as integrated parts of one energy-tracking framework

3. Harmonise GO access and strengthen claim supervision roles

Source: AIB reflection paper (2026)

1. One single instrument to anchor renewable claims

Why?

→ GOs uniquely allocate renewable energy attributes along the value chain.

→ Parallel approaches can create conflicting claims and duplicate administration.

→ A shared instrument supports integrity, comparability and confidence.

Align policy frameworks around GO ownership

Disclosure and accounting

→ Use CEN EN 16325-compliant instruments for market-based claims.

→ Use the Residual Energy Mix where energy is not covered by cancelled GOs.

→ Apply the same logic across disclosure, ESRS, CBAM, RFNBO, ETS and product rules.

Refine the GO where policies need more precision

Usage criteria

→ Use GO metadata to verify policy-specific conditions.

→ Translate temporal, geographical and device criteria into usage rules.

→ Connect PPAs or stricter chains of custody through advanced or bundled GOs.

Apply equivalent safeguards to imported attributes

Third-country recognition

→ Physical imports need comparable protection against double counting.

→ CEN EN 16325-equivalent instruments offer a common reliability benchmark.

→ Explore cancellation where physical linkage and safeguards are verified.

2. GO and PoS as integrated parts of one energy-tracking framework

Treat gas GOs and PoS as complementary

Different purposes, one coherent record

→ GO: ownership, transfer and disclosure of origin attributes.

→ PoS/UDB: sustainability compliance, GHG savings as criteria for target accounting.

→ Tracking method in line with the needs of both purposes

→ Both records need to converge latest at final consumption.

UDB – GO registry link: Select one complete route for cross-border transfers

Legal and technical clarity

→ Define where the live GO resides and where to validate it at consumption.

→ Identify the authoritative system for every data element.

→ Assign responsibility to validate, block, correct and cancel.

3. Harmonise GO access and strengthen claim supervision roles

Harmonise who may hold and cancel GOs

Access in the domain of consumption

- → Account and cancellation rights still vary between Member States.
- → Enable PPA participants to receive and cancel associated GOs.
- → Common access rules can reduce workarounds and improve market visibility.

Wider GO access, and proportionate supervision

Reliable corporate claims

- → Supervision needs to follow the actors making renewable claims.
- → Extend national supervision of suppliers to oversee also corporate claims backing with GOs.
- → Coordinate methods so rules are applied consistently across borders.

AIB can support implementation through co-creation

Don't skip the GO

- It would
  - Cause double counting
  - Duplicate verification processes
  - Increase risk of error and fraud

Build on the GO

- Existing framework
- Existing experiences
- Trusted instrument
- Market facilitating

✓ Conversation platform with 41 government-appointed Issuing Bodies, contributing registry operation experience.

✓ EECS rules, AIB Hub and AIB governance provide an established harmonisation base.

✓ Early dialogue with AIB can reveal and overcome legal and technical frictions before finalisation of rules.

Continue the dialogue

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