

## **AIB INPUT IN THE PUBLIC CONSULTATION ON THE CEER STRATEGY 2026-2029**

### **1 INTRODUCTORY STATEMENT**

AIB welcomes the opportunity to contribute to the public consultation of the Council of European Energy Regulators' (CEER's) on its Strategy for the period of 2026-2029.

Given the multiple new EU-wide policy areas where energy tracking is relevant, work is needed to harmonize tracking frameworks across policy areas. CEER is best positioned to bring forward harmonisation suggestions that relate practices in the Member States to the multiple new policy areas, especially given the fact that there are several NRA's amongst AIB's members.

AIB responds to CEER's public consultation to make sure that "GOs and Disclosure" are included in CEER's 2026–2029 work programme. Our input highlights the risks of inconsistent energy origin claims and calls for harmonised guidance across Member States and policy areas.

### **2 AIB'S ANSWERS TO THE QUESTION IN THE PUBLIC CONSULTATION**

#### **2.1 To what extent have we captured the key ongoing and anticipated trends and challenges as part of the changing energy system against the backdrop of geopolitical challenges?\***

The Association of Issuing Bodies (AIB) acknowledges the relevance of the key trends highlighted by CEER that will shape regulatory priorities in the coming years. In particular, AIB sees opportunities for continued cooperation with CEER in addressing "Governance challenges and innovations" and "Global price disparities and competitiveness".

The AIB is the international association of government-appointed entities for issuance of Guarantees of Origin (GO) for renewable electricity and gas under the Renewable Energy Directive Article 19, many of them NRAs. More at [www.aib-net.org](http://www.aib-net.org).

#### **2.2 To what extent do our proposed strategic priorities protect and empower consumers in light of the identified opportunities and challenges following the energy crisis?\***

Several new regulations introduced in recent years rely on information about the renewable or low-carbon origin of energy. If these policies are not well aligned across different levels, there is risk of double counting the same renewable energy. This can mislead consumers, who may believe they are making informed choices and contributing to the energy transition, when in fact the claims may not be reliable.

The disclosure of renewable energy origin remains an essential tool for consumer empowerment. Under the Internal Electricity Market Directive (2019/944, Annex I, point 5), suppliers must disclose the origin of electricity to consumers. The recast Gas Directive (Annex I, point 5) introduces a similar obligation for gas suppliers and calls on Member States to establish a supervision mechanism - often the role of the national regulatory authority. Experience with electricity disclosure shows the need for clear guidance and greater harmonisation among Member States to avoid double claims and to ensure that consumers can trust the information they receive. In this context, CEER could play a valuable role in supporting NRAs and promoting a more coordinated approach.

Much progress has been made on supplier disclosure to end consumers. However, other energy users - especially corporates - also need attention. Many corporates report on the origin of their energy independently and may be acting without intervention of a supplier. This is often linked to obligations under CSRD, EU ETS, RFNBO rules, CBAM, Ecodesign, Digital Product Passports, or voluntary schemes such as the Greenhouse Gas Protocol and product carbon footprint reporting (e.g. for batteries). Without a consistent and supervised system of tracking instruments - aligned with guarantees of origin - these overlapping frameworks may lead to inconsistent or conflicting claims, which could also confuse end-users and undermine trust in energy-related information.

CEER's strategic priorities could contribute meaningfully to consumer protection and empowerment even more by promoting stronger coordination of disclosure rules, by supporting supervision mechanisms, and by encouraging the development of consistent, transparent, and interoperable tracking systems across energy carriers and end-use sectors.

### **2.3 Does our strategy reflect new challenges while also continuing the path of the previous strategy?\***

As noted above, AIB sees a continued need for guidance to harmonize Member State practices, prevent double claims on the origin of renewable energy, and ensure efficient disclosure processes. These are not only ongoing issues but are becoming more complex due to the expanding use of origin-based reporting across multiple policy areas.

CEER's previous work "transparency and supervision on green claims" led to valuable advice on trustworthy green offers, in 2015 and 2023. <https://www.ceer.eu/publication/guidelines-of-good-practice-on-trustworthy-green-offers-and-consumer-protection-against-misleading-marketing-practices/>

AIB encourages CEER to continue this work item and to explicitly include the topic of "GOs and Disclosure" in its strategy.

AIB welcomes the opportunity to continue its cooperation with CEER and is open to exploring possible joint actions in this area.

### **2.4 Please indicate if you identify any missing priority on which regulators should focus.\***

The Association of Issuing Bodies (AIB) encourages CEER to include "guarantees of origin (GOs) and Disclosure" as a specific priority in its strategy. Reliable and harmonised disclosure systems are essential to avoid double counting of renewable energy and to ensure consumer trust in origin-related information.

The growing number of EU and national policies relying on energy origin data – for both consumers and corporates – increases the risk of inconsistent or conflicting claims if tracking systems are not well aligned. This applies across all energy carriers and end-use sectors.

CEER could further strengthen its impact on consumer protection, market transparency, and regulatory consistency by:

Promoting stronger coordination and harmonisation of disclosure rules among Member States.

Supporting robust supervision mechanisms for all forms of energy origin disclosure.

Encouraging development of interoperable tracking systems that align with GOs and are recognised across relevant policy frameworks.

AIB is open to working with CEER to address these issues and ensure that origin-related claims remain trustworthy and consistent.

**2.5 Do you have any additional comments or proposals regarding the draft CEER Strategy 2026-2029?**

AIB's expert opinion from managing GO systems does not necessarily represent all members' views, as some may not have decision-making authority on this topic.

**3 NOTE**

Link to CEER's document under consultation: [Draft CEER-Strategy-2026-2029-for-public-consultation-3.pdf](#)

Link to the CEER public consultation page: [Public Consultation on CEER Strategy 2026-2029 - CEER](#)

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