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# EECS RULES SUBSIDIARY DOCUMENT 07

## REVIEW PROCEDURES

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## STATUS OF THIS DOCUMENT

This document, AIB-EECS-SD07 EECS Rules Subsidiary Document 07 - Review Procedures, is a subsidiary document to the EECS Principles and Rules of Operation (the EECS Rules) of the Association of Issuing Bodies (AIB) for The European Energy Certification System.

In the event of conflict between the text of the EECS Rules and the text of this document, the EECS Rules shall always take precedence.

This EECS Rules subsidiary document was formally approved by the EECS Unit of AIB held on 24 February 2026.

The effective date of this EECS Rules subsidiary document is 25<sup>th</sup> February 2026.

Signed by the Secretary General

A handwritten signature in blue ink, appearing to be 'L Switten', written over a horizontal line.

L Switten  
11 March 2026

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## VERSION HISTORY

The version history contains the ten most recent releases.

Release	Date	Creator	Reason for Release
2.00	5 July 2011		Re-issue to support EECS Rules release 7.0
2.00 v2	23 September 2011		Release
2.01	2 February 2012		New AIB logo
3.00	31 March 2017		Formalising the Professional Reviewers' Group
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6.00	19 June 2020		Implementation of the new organisation model
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6.02	11 May 2023	Svenja Vloeberghs	Update Audit Checklist (Appendix 1)
6.03	29 August 2023	Svenja Vloeberghs	Change lay-out to AIB house style
6.04	11 March 2026	Secretariat	Updates to Audit Checklist (Appendix 1) and Cross-reference Matrix (Appendix 2)

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## A INTRODUCTION AND PURPOSE

### A1 INTRODUCTION

- A1.1 This document is a subsidiary document to the Principles and Rules of Operation (the EECS Rules) of the Association of Issuing Bodies (AIB) for The European Energy Certification System.
- A1.2 Specific reference is made to the EECS Rules Sections:
- (a) F – Admission and Expulsion Procedures
  - (b) I – Compliance
  - (c) J – Disputes
  - (d) K – Assessment Panels
  - (e) L – Change Procedures
- A1.3 This document is subject to the change management procedures set out in Section L of the EECS Rules and EECS Rules Subsidiary Documents AIB-EECS-SD05 – “*Change Management*”.
- A1.4 Selected parts of the quality management system ISO9001 and the “*Guidelines for quality and/or environmental management systems auditing*” serve as inspiration for the peer review standard to be used within the AIB. The approach and documentation closely follow the processes of reviewing (ISO: auditing), whereas the assessments of findings and subsequent actions are based on needs within the AIB and not part of the reviewing standard.
- A1.5 The auditing processes within the AIB are supplemented by the relevant provisions of the CEN standard EN16325. In case of conflicting provisions, a Change Request will be brought to the EECS Unit seeking to overcome the conflict.

### A2 PURPOSE

- A2.1 The Core Principles set out in the EECS Rules seek to establish and maintain a quality system for the operation of the EECS Certificates network. In its preface, the EECS Rules state that the quality standard will be maintained by peer review. The mechanism of peer review is carried out through Assessment Panels (see AIB-EECS-SD01 – “*Assessment Panels*”).
- A2.2 The purpose of this EECS Rules subsidiary document is set out the detailed review procedures for conducting an Assessment Panel. The starting point for this document is therefore when an Assessment Panel has been initiated as described in AIB-EECS-SD01 – “*Assessment Panels*”.
- A2.3 With different individuals reviewing different interpretations and methods of achieving the requirements of the EECS Rules, there is risk associated with the peer review process. This document seeks to manage that risk through providing a structure for individual reviews and a mechanism for reviewing the process itself.

**A3      STRUCTURE**

A3.1      REVIEW PROCESS of this document gives a generic overview of the review process. This is followed by sections providing the specific detail of the processes for each occurrence of peer review.

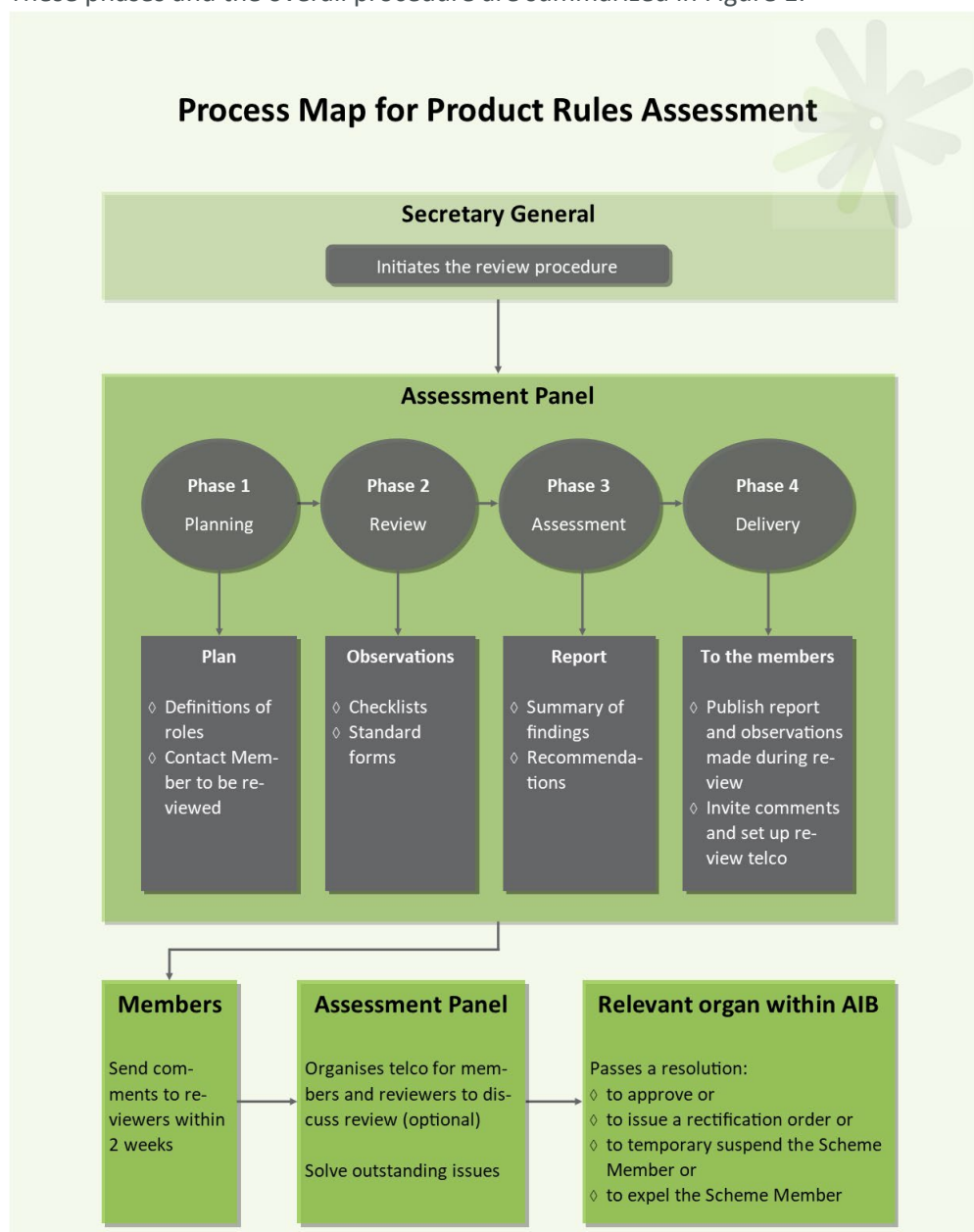
## B REVIEW PROCESS

### B1 OVERVIEW

B1.1 The review process consists of four phases:

- (a) a plan for conducting the review and the assessment;
- (b) systematically recording the observations (objective facts) in a review report;
- (c) methodically evaluating the observations, leading to a conclusion;
- (d) a decision by the relevant organ within AIB based on written documentation in a standard form.

These phases and the overall procedure are summarized in Figure 1.



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## B2 PHASE 1 - PLANNING

- B2.1 The initial task of an Assessment Panel is to set out its plan to fulfil its task.
- B2.2 The plan should cover:
- (a) the definition of roles and assignment of tasks and responsibilities to the Panel members;
  - (b) the recognition of the review objectives, scope and criteria;
  - (c) the identification of which documents are needed for review;
  - (d) the time schedule for the review and assessment;
  - (e) how and when to establish communication with the Member being reviewed;
  - (f) any practical circumstances in connection with on-site review (not relevant when reviewing initial applications or amendments/ alterations);
  - (g) how to investigate applications for approval of Member's Agents and Measurement Bodies in accordance with Subsidiary Document AIB-EECS-SD04 – *“Member's Agents and Measurement Bodies”* (if applicable).
- B2.3 In establishing the assignment of tasks, it is not necessary for all reviewers to conduct all aspects of the review. However, as an Assessment Panel, all reviewers are collectively responsible for the work of that Panel.
- B2.4 The Assessment Panel will establish communication with the Member being reviewed to ensure a positive dialogue and:
- (a) confirm its authority to conduct the review;
  - (b) provide information on the proposed timing;
  - (c) make practical arrangements for the review including:
  - (d) site visits (Periodic Member Audit and compliance assessment only);
  - (e) availability of appropriate personnel;
  - (f) discuss mutual expectations to make sure that they are harmonized. To obtain a successful result it is essential that the two parties expect a similar sequence of events; and
  - (g) obtain any security clearance required by the reviewed Member, which may include site passes and/or non-disclosure agreements with the individual reviewers (i.e. not their respective organisations nor the AIB).

## B3 PHASE 2 - REVIEW

- B3.1 The Assessment Panel will obtain the documentation necessary for the assessment.
- B3.2 In accordance with EECS Rules Sections E and M, the formally reviewed version of the Scheme Member's documentation will be the English form. Native language versions may also be requested and reviewed.
- B3.3 English versions of relevant national legislative documents should be provided where they exist. Where only official summaries in English exist, these should be provided along with the native language text. Where no official summary in English exists, the Assessment Panel may request the Member to provide a short summary in English.

- B3.4 Guidance, checklists and standard forms in the sections of this document describing each of the instances of Assessment Panels will assist the Panel to identify the required documentation.
- B3.5 The mapping of EECS Rules requirements to their effective terms in the Domain Protocol forms a cross reference matrix for the review. The format given in 0 SECTION 2 must be used for this purpose. This matrix must include all the EECS Rules section mappings shown in the EECS-Domain Protocol mapping table. It should be noted that the Domain Protocol side of the mappings given in that document relate to a Domain Protocol template and that they should be amended where necessary for the Member's Domain Protocol for the EECS Scheme under consideration.
- B3.6 In reviewing the documentation, observations are recorded for subsequent assessment using the observation register (see 0 SECTION 3).
- B3.7 The Assessment Panel should seek clarification from the Member on any matters it considers insufficiently clear.

#### B4 PHASE 3 - ASSESSMENT

- B4.1 The Assessment Panel will evaluate the observations in the context of the Member's operation and the requirements of the EECS Rules.
- B4.2 This document provides assistance with the details of conducting the assessment phase in the sections describing each of the instances of Assessment Panels.
- B4.3 The Assessment Panel should maintain a dialogue with the Member during the assessment phase and give the Member opportunity to comment and correct any issues raised by the observations.
- B4.4 Member responses and the Panel's assessments are recorded in the observation register. Unresolved issues must be reported accordingly.
- B4.5 The time schedule for the assessment may be extended by agreement of the Member and the Assessment Panel.
- B4.6 The result of the assessment phase is the compilation of the report. The content of the report must be in accordance with AIB-EECS-SD01 – "Assessment Panels". A format for the report is given in 0 SECTION 4, and will be complemented with a report as in 0 SECTION 7.
- B4.7 The content of the report must comply with the requirements of any non-disclosure agreement between the individuals in the Panel and the Member whilst also conveying an appropriate level of information to justify the conclusions reached.

#### B5 PHASE 4 - DELIVERY

- B5.1 When the outstanding observations of the assessment have been resolved or cannot be resolved, the Assessment Panel will upload the Domain Protocol and the review report on the Members Section of the website to obtain the comments and contributions of all Scheme members and send out an email to all AIB members informing them of the upcoming closure of the assessment with a link to these documents, also called **Review Closure Notification**. This shall take place at the latest 6 weeks before the relevant Scheme Group meeting that is targeted for taking a decision on this assessment.

Members are given two weeks to contribute to the review findings, ask questions to the Assessment Panel, and ask the reviewers to set up a dedicated 'Review telco' meeting. Reviewers and reviewee will answer these questions as soon as reasonably possible and, if asked, the professional reviewer will organise a Review Telco. where all members and Professional Reviewers are invited. During this Review telco the pending issues are presented and where all attendees will get the chance to provide their comments. The Assessment Panel integrates the comments in the review report and sends it to the reviewed Member or applicant to answer the comments, in order for the review to be completed in time for consideration and formal approval at the next meeting of the relevant organ of the AIB (as explained in Subsidiary Document SD01 "*Assessment Panels*"), according to the Articles of Association and the EECS Rules.

B5.2 When the review and the assessment have been concluded, both the observations register, the report and the adapted Domain Protocol are sent to the Secretary General by the Assessment Panel in accordance with AIB-EECS-SD01 – "*Assessment Panels*" to be brought for approval to the next meeting of the relevant AIB organ.

B5.3 The observations are published to Members as a reference for:

- (a) subsequent Assessment Panels where the subject is the same Member; and
- (b) an Assessment Panel convened for the purpose of monitoring the effectiveness of the review process.

In accordance with AIB-EECS-SD01 – "*Assessment Panels*", one of the reviewers will prepare a paper to be brought before the relevant organ of the AIB (as explained in Subsidiary Document SD01 '*Assessment Panels*') based on the report thereby respecting the deadlines for publication. A format for the report is given in 0 SECTION 4 and SECTION 7.

For Scheme membership applications, the member reviewer will present the review at the relevant Scheme Group meeting. Decisions on Scheme membership applications will take place according to C1.

For Member Audits, the main findings of the audit, as set out in the report in accordance with the template in 0 SECTION 4 and SECTION 7, are presented at the Scheme Group meeting by the member-reviewer and including the advice of the auditors. In case a dedicated Review Telco has taken place, the advice of the participants of the Review Telco is presented to the Scheme Group. The Scheme Group will formally take a decision to confirm the approval of the audit and thereby relieve the review panel of their liability.

The Secretary General will retain the report and observations for a period not less than 10 years.

## B6 **PROCESS REVIEW**

B6.1 The Professional Reviewers Group will monitor the effectiveness and conduct periodic reviews of the review process.

B6.2 The report summarising this process review will include:

- (a) a list of the reviews/ assessments that have been conducted since the previous review;

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- (b) feedback from Assessment Panel Members and reviewed Members;
  - (c) whether the guidelines and checklists have been used correctly;
  - (d) a check of the Secretary General's assessment archives;
  - (e) an evaluation of the ongoing value of the reviews/ assessments.

B6.3 The report from such a review will form a decision paper to the EECS Unit.

## C DOMAIN SCHEME ASSESSMENT

### C1 APPLICATION FOR SCHEME MEMBERSHIP

- C1.1 The review process will follow that set out in REVIEW PROCESS above.
- C1.2 The review is of documentation and systems only. No on-site inspections will be conducted.
- C1.3 The time schedule of the assessment will be in accordance with AIB-EECS-SD01 – “Assessment Panels”.
- C1.4 The organisation applying for an EECS Scheme membership must provide all the documents listed in the checklist shown in 0 SECTION 1.
- C1.5 The reviewers will communicate with a primary contact of the applicant Scheme Member via e-mail and telephone. All e-mails between the Member’s contact person and the Panel members must be sent to all three individuals. The contact person will strive to respond to a question within three working days.
- C1.6 The applicant Scheme Member must provide a Domain Protocol, a Data Sheet on GO and Disclosure, a cross-reference matrix (see Section B3.5 above) applicable to the Domain Protocol and the template Standard Terms and Conditions it will impose on its Market Participants (see EECS Rules E7.1.1 and F4.3.4).
- C1.7 As part of the review phase (see Phase 2 - Review above), the reviewers will use the checklist shown in Audit Checklist and 0 SECTION 1 to establish completeness of the document set provided.
- C1.8 The Product Rules Assessment Panel will check the cross-reference matrix provided against the list of EECS Rules sections in the EECS-Domain Protocol mapping table given in the EECS Rules Fact Sheet AIB-EECS-FS10 – “Guidelines and Framework for Domain Protocols” to ensure completeness of the required mappings. Any omissions will be recorded in the observations register (see 0 SECTION 3) and referred back to the prospective Scheme Member for update.
- C1.9 As part of the assessment phase (see Phase 3 - Assessment above), the Product Rules Assessment Panel will check the mappings in the cross-reference matrix ensuring that the requirements of the EECS Rules are adequately satisfied.
- C1.10 Any queries or doubts about the adequacy of the statements in the applicant Member’s documentation will be noted in the observation register and referred back to the applicant Member for comment.
- C1.11 The criterion for an approval is for the applicant Scheme Member to have set out how each of the requirements in the EECS Rules relating to:
- (a) Product Rules and the conveying of rights and obligations between the applicant Scheme Member and a participant in its Product Rules; and
  - (b) the obligations of a Scheme Member to the AIB will be satisfied.
- C1.12 On closure of the assessment, the report as in Appendix 2 Section 4 and Section 7 is prepared and submitted to the Secretary General, along with the completed forms from Appendix 2, sections 1, 2, 3, 5 and 6, the Domain Protocol and the Data Sheet on GO and Disclosure.

C1.13 The presentation at the Scheme Group should be a general, understandable presentation including information on disclosure, support, etc. It should follow a template to be consistent with the provided information and it should highlight major problems (outstanding or solved).

## C2 **AMENDMENT OF THE DOMAIN PROTOCOL BY AN EXISTING SCHEME MEMBER**

C2.1 Where the proposed amendment of the Domain Protocol is limited to changing the list of approved agents and measurement bodies, Member's Agents and Measurement Bodies shall apply.

C2.2 If not published on the Domain section of the AIB website, the Secretary General will provide the reviewers with:

- (a) a copy of the archived documentation from the last full Product Rules assessment (on application or Periodic Member Audit);
- (b) all subsequent amendment assessments; and
- (c) a copy of the relevant Change Proposal.

C2.3 The review process will follow that set out in Application for Scheme Membership except that only those documents affected by the proposed change will be reviewed.

C2.4 During the review, the reviewers must determine what they consider to be the impacted documentation from the checklist in 0 SECTION 1.

C2.5 Previously accepted statements should not be reassessed unless the proposed change has impact on their meaning or effect.

C2.6 The assessment in The criterion for an approval is for the applicant Scheme Member to have set out how each of the requirements in the EECS Rules relating to: shall be restricted to only those changes resulting from the Change Proposal.

C2.7 At the time of amending a Domain Protocol, this shall also be adapted to the latest available template.

## C3 **MEMBER'S AGENTS AND MEASUREMENT BODIES**

C3.1 The specific process for the assessment and approval of Member's Agents and Measurement Bodies is described in AIB-EECS-SD04 – "*Member's Agents and Measurement Bodies*".

## C4 **(PERIODIC) MEMBER AUDIT**

C4.1 These reviews occur in accordance with AIB-EECS-SD01 – "*Assessment Panels*".

C4.2 Whereas the initial application and Domain Protocol amendment assessments are documentation-only reviews focusing on the statements of a Scheme Member on how it will comply with the rights and obligations placed on it by the EECS framework, the remit of a Periodic Member Audit focuses on the operations of the Scheme Member in actually fulfilling those obligations.

C4.3 The reviewers for the first (1 year) Periodic Member Audit should comprise the same persons as for the application assessment where possible. However, changes in the Product Rules Assessment Panel Matrix may prevent this.

- C4.4 A Periodic Member Audit must include an inspection at the primary location where registry activities are carried out by/for the Scheme Member under review. This will be the premises of the AIB Member, where appropriate. Access to the registry must be provided, and if available the test registry. If the AIB Member does not have access to the full chain of data establishment leading to the issuing of EECS certificates, representatives of the Production Registrar and/or Registry Operator shall be invited and the AIB Member shall ensure that access is provided to all relevant processes to be assessed. If the AIB member cannot provide the relevant access this will be recorded in the observation register. To ensure fairness and objectivity, both members of the Product Rules Assessment Panel must attend the site visit.
- C4.5 The reviewers will request the documentation identified in the checklist in 0 SECTION 1, together with any relevant agency agreements, from the Scheme Member under review and will also obtain previous Assessment Panel reports and observation registers for that Scheme Member from the Secretary General. Reviewers need only see the terms relevant to operational content of an agency agreement. Commercial details do not need to be disclosed.
- C4.6 Periodic Member Audit is conducted using a sampling approach. As part of its assessment planning, the reviewers will choose a number of obligations on the Scheme Member from the EECS Rules to assess. The number and scope of the obligations assessed must be such that the review is sufficiently substantive to maintain the overall quality of AIB members' activities without being unduly onerous. In selecting the sample for analysis, reviewers should consider previous periodic assessment samples with the objective of covering all the main obligations with a cycle of three assessments.
- C4.7 The first review (at one year) must include, but is not limited to:
- (a) the process of verifying Production Devices at registration;
  - (b) the overall responsibility for issuing within the obligations being assessed;
  - (c) the publication of statistics on the reviewed member's website in accordance with section E3.3.4 of the EECS Rules;
  - (d) the local practice of electricity disclosure, including the update of the Data Sheet on GO and disclosure.
  - (e) compliance with the Hub Participant Agreement and
  - (f) consistency of the Standard Terms and Conditions with the AIB template.
- C4.8 The aim of the Periodic Member Audit is to assess operational practice, and therefore the specific sample questions should not be disclosed to the Scheme Member under review in advance of the site inspection. However, the Scheme Member should be notified of the obligation areas that will be assessed. The Scheme Member must ensure that relevant operations personnel are available on the agreed inspection date such that compliance with the sampled EECS Rules obligations can be demonstrated to the reviewers on request.
- C4.9 An audit checklist has been prepared by the Professional Reviewers Group and forms APPENDIX 1 to this document.

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- C4.10 The initial checks carried out by the reviewers should include verification that the documents provided are the approved versions and are consistent with the currently release of the EECS Rules. This check will provide assurance that the Scheme Member has complied with the change management processes including this document (see C2).
- C4.11 When on site, the reviewers should invite the Scheme Member's (or his agent's) personnel to show how the obligations in the sample are met in practice. Part of such a demonstration may require data evidence from the EECS Registration Database. Access to the database for the purposes of the assessment must not be unreasonably withheld.
- C4.12 The reviewers will maintain an observation register (0 SECTION 3) throughout the review.
- C4.13 The assessment should be conducted in a spirit of co-operation with the objective of providing quality assurance for all Members and market participants.
- C4.14 During the Periodic Member Audit, the Domain Protocol of that member shall be checked for consistency with current practice. The Domain Protocol will also be adapted to the latest available template and will be reviewed against changes of the EECS-Rules since it was written.
- C4.15 The criteria for approval are:
- (a) the operations sampled are performed in a manner compliant with the documentation in use;
  - (b) the documentation in use remains compliant with the EECS Rules; and
  - (c) in the opinion of the reviewers, on behalf of the AIB, the operation of the Scheme Member, upholds the quality standard of the AIB.
- C4.16 On completion of the assessment, the reviewers will submit their report using the format in 0 sections 4, 5 and 6.

## **D COMPLIANCE ASSESSMENT**

### **D1 PHASE 1**

- D1.1 Compliance Assessment Panels are convened in accordance with AIB-EECS-SD01 – “Assessment Panels”.
- D1.2 The Secretary General will provide a brief for the Compliance Assessment Panel based on the case presented to him.
- D1.3 Where the Compliance Assessment Panel is convened following a recommendation or appeal in conjunction with a Product Rules Assessment, the brief shall include:
- (a) a copy of the documentation from the relevant Product Rules assessment;
  - (b) where applicable, a copy of the notice of appeal; and
  - (c) any other documentation he considers relevant to the case.
- D1.4 Where the Compliance Assessment Panel is convened following a complaint alleging non-compliance, the brief shall include:
- (a) a copy of the notice of complaint;
  - (b) his initial assessment of materiality; and
  - (c) any documentation he considers relevant to the case.
- D1.5 At its first meeting, the Compliance Assessment Panel will elect a co-ordinator from its members to act as a project manager.
- D1.6 The review process will follow that set out in REVIEW PROCESS except that only those parts of the documents and activities concerning the alleged non-compliance will be reviewed.
- D1.7 The planning phase, defining the objectives, exact scope and criteria is very important and will be limited to the brief provided.

### **D2 PHASE 2**

- D2.1 As part of the review stage, the Compliance Assessment Panel must determine what it considers to be the impacted documentation from the checklist in APPENDIX 1 and 0 SECTION 1 and the formal AIB documentation.
- D2.2 Before looking at the specific alleged non-compliance, the Compliance Assessment Panel must establish how the alleged non-complying Scheme Member performs the task under normal circumstances. This will be done by reading copies of relevant material, by performing telephone interviews, by gaining access to that Member’s EECS Registration Database and/or by carrying out on-site review.
- D2.3 The Compliance Assessment Panel will review the specific case of alleged non-compliance to determine whether the case is different to routine performance.
- D2.4 The Compliance Assessment Panel may also review how similar tasks are performed in other Product Rules (including other EECS Schemes) as a reference for ‘best practice’ if it considers such a reference is necessary for its assessment.

### **D3 PHASE 3**

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- D3.1 The Panel will make its assessment of both the general performance and the specific case in terms of compliance with the EECS Rules.
- D3.2 The Panel must decide if the observations, which were made during the review, illustrate the relevant problems raised by the complaint and if it is possible to make a conclusion on the basis of the review. If this is the case, the Panel can finalise their report. If not, the review has to be expanded and the Panel has to go back to phase 2.
- D3.3 If the Panel finds that the complaint is valid and that the allegation of non-compliance is justified, the non-compliant Scheme Member should be notified before the report is sent to the Secretary General.
- D3.4 As part of its assessment, the Compliance Assessment Panel must also consider the broader context of the issue in terms of both operational best practice and the Core Principles set out in the EECS Rules Section A. Regardless of whether it finds a non-compliance, if it believes the EECS Rules could be improved by a clarification amendment, so avoiding further allegations of non-compliance of a similar nature, then the Panel should make such a recommendation and a draft Change Proposal in accordance with AIB-EECS-SD05 – “*Change Management*” should be submitted with the report.
- D4 **PHASE 4**
- D4.1 The report (see section B4.6) together with any documentation produced in association with the compliance assessment is submitted to the Secretary General.

## APPENDIX 1. AUDIT CHECKLIST<sup>1</sup>


### 1. Background, Legislation, Disclosure

- Provide basic information on GO market and the renewable energy market (relevant for emerging markets such as biomethane)
- Where relevant: information on national GOs and other certificates
- Verification of the Domain: which territory is covered by the GO Scheme (relevant where the country has over sea territories)
- Update on recent changes and/or foreseeable changes of relevant legislation (including transposition of relevant EU legislation)
- Independence of Issuing Body from market parties
- Roles and responsibilities (how they are separated, e.g. collecting measurement values vs auditing measurement values)
- What is the methodology for calculating the Residual Mix?
- Disclosure: suppliers' fuel mix verifications
- Disclosure: certificates valid for disclosure
- Disclosure: avoidance of double counting of EECS certificates
- Disclosure: are there requirements for matching production and consumption periods? At what granularity?
- Qualitative data sheet on disclosure (National Datasheet on GOs and Disclosure)
- Do you send Ex Domain Cancellations (EDCs) to AIB and when was it last updated?
- Inter-relation to other certificates and/or tracking systems
- Ex-Domain Cancellations: exports to non-EECS countries?
- Ex-Domain Cancellations: EDCs for use in another EECS Domain? Are they backed up by an EDC agreement?
- Are Ex-Domain cancellations being reported to AIB and to the other Domain?
- It is possible to convert national GOs into EECS GOs and if so, under what conditions can National GOs be converted into EECS GOs?
- Criteria for refusal of import of EECS certificates
- Criteria for refusal of imported EECS Certificates from another domain for the purpose of disclosure
- Are Fact Sheets 3, 4, 6, 16 and 17 posted on the AIB website up to date? (See AIB website)

### 2. Account Holder (+STCs)

- Do the Standard Terms and Conditions (STCs) satisfy the EECS rules (check an example of a signed document)
- STCs signing/acceptance procedure
- Account Application process (example of account application form template)
- Methods of detecting and preventing VAT fraud, KYC policy (check an example, if in use)
- Account Holder login safety measures

<sup>1</sup> This checklist is drafted by the Professional Reviewers Group pursuant section C4.9 of Subsidiary Document SD07 – Review Procedures

### 3. PD Registration (+auditing)

- PD registrations and re-registrations process
- PD validity period check
- PD Auditors (including their independence and qualifications)
- PD audit process
- PD audit documentation (check examples including verification of ownership (Power of Attorney), Metering diagrams)
  
- Procedure when accepting a PD application
- Maintenance of PD standing data
- Error handling of PD information and corrective measures in case of inaccuracies
- Examples of registration, verification and other documentation
- Auxiliaries
- Metering requirements

### 4. Certificate system administration

- Feeding metering values into system
- How is it ensured that net metering data is used (issuing for net electricity injected to the grid)
- 
- Production/Consumption declarations and audit of these (example)
- Issuing process
- What triggers the first issuing of GOs to a PD after registration? Does a request have to be submitted?
- Is all required data listed in the GO?
- What energy source is used for the issuance of GOs?
- Treatment of onsite consumption
- Where energy is left over after GOs issuance for a period, how is this leftover energy treated? Is it ignored, carried forward to the next period, or something else?
- Transfers (process, error handling etc.)
- Export/Import messages (success/failure etc.)
- Alerts for pending or rejected transfers (within the domain)
- Spreadsheet - Imposed conditions for trade, expiry and cancellation.
- What happens when a request for an import of non-EECS GOs is received?
- Cancellation (process, error handling etc.)
- Cancellation for future use – is this permitted?
- Is all required data logged in the cancellation request?
- Is all required data logged in the cancellation statement, especially the recently added information?
- Under what conditions are GOs withdrawn and/or expired? How are withdrawals and expired GOs processed?
- High-Efficient Cogeneration
  - HEC GOs: is a legislation in place, and is it implementing Directive 2012/27?
  - HEC: is there a mechanism for identifying useful heat, and measuring and checking heat output and fuel input?
  - How many PDs have been registered for HEC GOs?
- Are nuclear and fossil GOs issued?
- Has the Technical audit been scheduled and have any issues arisen which need to be addressed?

- Have there been any system changes since the last technical audit?
- Alerts for expiry of certificates and PD registration periods
- Error handling - certificate information and transactions - including pending and rejected transfers
- Examples of Meter Readings from Measurement body, Meter data supplied by registrant, Production declaration, production declaration verification, flow diagrams, issuing requests
- Immutability of Certificates? The certificate data specified by the EECS Rules shall not change in any way once an EECS Certificate has been properly issued, except to indicate that it has expired, cancelled or withdrawn.
- EECS Rule C.3.4.1: frequency of issuing – GOs with a production period > 1 month? How is this apportioned between the months?
- Issuing certificates before/after date operational?
- Compliance with DP: not issuing HEC, biomass, etc...?

#### 5. Attributes

- Do GOs contain information which may be used to calculate the carbon footprint? What is the process for determining it?
- Optional data field on GOs regarding GHG emissions: is it expressed in CO<sub>2</sub> or in CO<sub>2</sub>eq? What is the process and methodology applied? Is Factsheet 24 correctly and completely displaying the used methodology?
- What 'dissemination level' values are in place in the Domain?
- Is the dissemination level on GOs always =02? If other values are allowed, what reasoning is applied and how are double claims prevented in Disclosure and in the calculation of the residual mix?
- Is the Production Period length standardized and do the real start and end time of the production period match with the reported ones on the GO, and within the requirements of FS25 and SD03?
- Are sub-hourly production periods recorded on the GO? If so, what is the process for establishing this?

#### 6. Other topics

- Are roles as described in the DP?
- What public statistics are issued? How often?
- Are public statistics up to date?
- How long is transaction data retained, how accessible is it, and where is it retained?
- Backup of data and the system's resilience to external threats
- Backup of data and the system's resilience to external threats (e.g. physical threats, improper access e.g. hacking ... etc.)
- Compliance with the HPA
- Insurance requirements under the HPA -> including request for the insurer to certify the scope of the cover, and whether the premium has been paid (past and near future)
- Have all issues from previous audits/reviews been resolved?
- Do the DP and practice comply with the latest changes of the EECS Rules
- Is the DP in latest DP template/format
- For information: GDPR compliance: has a GDPR compliance audit been completed (not obligatory), and have measures been implemented to comply with the GDPR Regulation?

#### 7. Conversion

- Overview of the conversion cases with GO-relevance:

- Which input energy for which EECS GOs must be cancelled, can be converted into output energy for which EECS GOs must be issued?
- Description of process flow for conversion issuance
- Conversion Issuance: only for the PROPORTION of MEASURED input energy for which ADEQUATE GOs are cancelled?
  - Where national GOs exist: are only EECS GOs of the input energy cancelled for input for issuance of EECS GOs for the output energy?
- Will certificates be imported for energy carriers for which the member has not been appointed?
- If certificates are imported for energy carriers for which the member has not been appointed, can they be cancelled for purposes other than conversion?
- If certificates are solely imported for energy carriers for which the member has been appointed,, what is the process for accepting (cancelled) GOs for input for conversion?
- Show samples of cancellation statements for input for conversion:
  - Do cancellation statements for input for conversion contain the conversion device and production period?
  - Are the conversion device and production period separated in the cancellation statistics, and can they be identified as such by the Disclosure Competent Authority? Is there any double claiming risk?
- Are GOs flagged with 'Conversion' Flag according to Fact Sheet 23?

## 8. Storage

- Does GO cancellation take place for Input to a Storage System and are GOs issued for the output from such a the Storage System?
- If so, what is the process for doing this?
- Are GOs issued for the output from the Storage System marked with the Storage Tag according to Fact Sheet 23? (cfr EECS C3.2.4)

## 9. Gas

- What type of Gas GOs are issued?
- Will the registry accept gas and hydrogen GOs for import/export?
- Do inspections take place annually? Do onsite inspections take place every two years? Do inspections check the energy source to be renewable?
- Auxiliaries: are gaseous and non-gaseous auxiliaries deducted from output? What is the control system for checking that exemption rules which allow for the inclusion of non-gaseous auxiliaries have been applied?
- Are Ex Domain Cancellations taking place? Are there Cancellation Agreements in place with the respective issuing bodies of the originating/destination Domain?
- Are there any non-governmental certificates issued for gas?
- Which organisation reports to the Union Database for sustainable biofuels? Are double consumption claims prevented with gas that receives GOs?
- What is the scope of the gas disclosure legislation?
- What types of gas receives GOs?
- Are there other tradeable certificates in your country than the EECS Gas GO? Are there, for the same gas production, existing documents with PoS, tradeable separately from GOs? If so, in what context? Can GOs and other tradeable documents for the same gas production end up with different consumers?
- Is the GO integrating other information to serve accounting for policy targets? How?

- 
- If so, is there emission information integrated onto the GO after its issuance, in subsequent steps of the supply chain?
  - Do the GOs contain optional attributes that refer to a Proof Of Sustainability? What is the process for making this link? How is the validity of a sustainability certificate kept into account in this process and in the data on the issued GOs? What is the relationship between the GO Issuing Body and the Certification Body that confirms compliance with sustainability criteria?
  - What is the process for acquiring the optional data fields on gas GOs?
  - Which organisation(s) determine compliance with criteria like sustainability, RFNBO, low-carbon? How do you interact with them? What reporting flows exist?
  - What is the status of the interaction between the GO registry and the Union Database?
  - How are gas GOs used in EU-ETS and/or the Effort Sharing Regulation (ESR)? Are double claims prevented in this process?
  - What organisations interact in your country regarding the tracking of the origin of gases.

## APPENDIX 2. REVIEW REPORT TEMPLATE

### SECTION 1. DOCUMENTATION CHECKLIST

To be completed and extended as necessary by the Assessment Panel.

<b>Applicant/Member</b>	
<b>EECS Scheme</b>	
<b>EECS Product(s)</b>	[GO/ Support certificate/ Non-governmental Certificate]

Documents	Received (✓)	Date Received
Description of Domain		
Description of Product Rules		
Domain Protocol		
Domain Protocol in latest available template		
Standard Terms and Conditions		
Technical Audit Report		
List of Member's Agents and Measurement Bodies (if any)		
Cross Reference Matrix		
Datasheet on GO and Disclosure		
Survey on restrictions for GO Trade, Expiry and Cancellation		

Other documents (if any)	Received (✓)	Date

Previous assessment reports (by type of assessment report:)	Comments from review report incorporated in this review (✓)	Dates of 1) The finalisation of the review report and 2) previous onsite audit visit (where relevant)
Scheme member application / Domain scheme amendment / Periodic Member Audit / Compliance assessment		

Previous assessment reports (by type of assessment report:)	Comments from review report incorporated in this review (✓)	Dates of 1) The finalisation of the review report and 2) previous onsite audit visit (where relevant)
Scheme member application / Domain scheme amendment / Periodic Member Audit / Compliance assessment		
Scheme member application / Domain scheme amendment / Periodic Member Audit / Compliance assessment		

Review Date	Reviewed by

## SECTION 2. CROSS-REFERENCE MATRIX

<b>Applicant/Member</b>	
<b>EECS Scheme</b>	

These tables are to be completed by the applicant/Scheme Member (except for the comments column) adding additional rows/columns to each table as required. The documents identified in the reference documents table should include: the Domain Protocol, the Member’s Standard Terms and Conditions for service provision to Domain Participants, national legislative and regulatory documents, and any other relevant documentation.

### List of reference documents

Reference	Document title	English version (✓/–)	English summary (✓/–)
A	Domain Protocol		
B	Standard Terms and Conditions		
C			
D			

The following matrix must include all the required EECS Rules section references copied and pasted from the current version of EECS Rules Fact Sheet AIB-EECS-FS10 – “*Guidelines and Framework for Domain Protocols*”. The cross-referenced document(s) should be marked with ‘x’ in the appropriate column(s). The reference location is the statement identifier in the Member’s Product Rules document(s). The comments section is to be completed by the Assessment Panel.

The updated Domain Protocol Template (referred to in the List of reference documents above with “A”), contains three main sections that may be object of the review process, and that are incorporated into the cross-reference matrix below:

- Section I Common (referred to as “I” in the cross-reference matrix table)
- Section II Electricity (referred to as “II” in the cross-reference matrix table)
- Section III Gas (referred to as “III” in the cross-reference matrix table).

EECS Rules Section	A			B	C	D	Reference Location	Assessment Panel Comments
	I	II	III					
<b>A2.1.1</b>								
<b>A2.1.2</b>								
<b>A2.1.3</b>								
<b>A2.1.4</b>								
<b>A2.1.6</b>								



EECS RULES SD07  
REVIEW PROCEDURES



EECS Rules Section	A			B	C	D	Reference Location	Assessment Panel Comments
	I	II	III					
A3								
A4								
A5.1.3								
A11.1.1								
C2.1.1								
C2.1.2								
C2.2.1								
C2.2.2								
C2.2.3								
C2.2.4								
C2.2.5								
C2.2.6								
C2.2.7								
C3.1.1								
C3.2.1								
C3.2.2								
C3.2.3								
C3.2.4								
C3.3								
C3.4.1								
C3.4.2								
C3.4.3								
C3.4.4								
C3.5.1								
C3.5.2								
C3.5.3								
C3.5.4								
C3.5.5								
C3.6								
C3.7								
C4.1								
C5.1.1								
C5.1.2								
C5.1.3								
C5.1.4								
C5.1.5								
C5.1.6								
C5.1.7								
C5.2.3								

EECS Rules Section	A			B	C	D	Reference Location	Assessment Panel Comments
	I	II	III					
C6.1.1								
C7.1.1								
C7.1.3								
C7.1.4								
C7.1.5								
C7.1.6								
C7.2.1								
C7.2.2								
C7.2.3								
C7.3.1								
C7.4.1								
C8.1.1								
C8.2.1								
C8.3.1								
C8.4.1								
C8.4.2								
C8.4.3								
C8.5.1								
D3.1.2								
D4.1.2								
D5.1.2								
D6.1.2								
D7.1.2								
D8.1.2								
D9.1.2								
E3.3.4								
E3.3.7								
E3.3.8								
E3.3.9								
E3.3.10								
E3.3.11								
E3.3.14								
E4.2.2								
E4.2.3								
E4.2.5								
E4.2.6								
E4.2.7								
E4.2.8								
E5.1								

EECS Rules Section	A			B	C	D	Reference Location	Assessment Panel Comments
	I	II	III					
E6.1.1								
E6.2.1								
E6.2.2								
E6.2.4								
E6.3.1								
E6.3.2								
E6.3.3								
E6.3.4								
E7.1.1								
G2.2.1								
H								
J1.1.2								
L5.1.1								
N3.1.1								
N4								
N5								
N6.2								
N6.3.1								
N6.3.2								
N6.4.1								
N6.4.2								
N6.4.3								
N6.4.4								
N6.5								
N6.6.1								
N6.6.2								
N6.6.3								
N6.6.4								
N7								
N8								
N9.1.1								
O2.1.1								
O3.1.1								
O4								
O5								
O6.2								
O6.3								
O6.4.1								
O6.4.2								



EECS RULES SD07  
REVIEW PROCEDURES



EECS Rules Section	A			B	C	D	Reference Location	Assessment Panel Comments
	I	II	III					
<b>O6.4.3</b>								
<b>O6.4.4</b>								
<b>O7</b>								
<b>O8</b>								
<b>O8.1.1.(d)</b>								
<b>O11</b>								

Review Date	Reviewed by

### SECTION 3. OBSERVATION REGISTER

To be completed and extended as necessary by the Assessment Panel.

<b>Applicant/Member</b>	
<b>EECS Scheme</b>	
<b>Date of Assessment</b>	

Observation #	1.
Reference in EECS Rules /Audit checklist	
Observation	
Response from Member	
Assessment	

Observation #	2.
Reference in EECS Rules /Audit checklist	
Observation	
Response from Member	
Assessment	

Observation #	3.
Reference in EECS Rules /Audit checklist	
Observation	
Response from Member	
Assessment	

Observation #	4.
Reference in EECS Rules /Audit checklist	
Observation	
Response from Member	
Assessment	

Observation # 5.	
Reference in EECS Rules /Audit checklist	
Observation	
Response from Member	
Assessment	

Observation # 6.	
Reference in EECS Rules /Audit checklist	
Observation	
Response from Member	
Assessment	

Observation # 7.	
Reference in EECS Rules /Audit checklist	
Observation	
Response from Member	
Assessment	

Observation # 8.	
Reference in EECS Rules /Audit checklist	
Observation	
Response from Member	
Assessment	

## SECTION 4. REPORT FORMAT

TO BE COMPLETED BY THE ASSESSMENT PANEL

<b>Reviewed Applicant/Member</b>	
<b>Date (completion)</b>	
<b>EECS Scheme</b>	
<b>Domain</b>	
<b>Type of Assessment Panel</b>	<i>[delete as appropriate]</i> Product Rules Assessment Panel / Compliance Assessment Panel
<b>Type of review</b>	<i>[delete as appropriate]</i> Scheme member application / domain scheme amendment / Periodic Member Audit / compliance assessment

### Assessment panel members

Name	Member represented

### Visited sites (if any)

### Documents reviewed (including version numbers)

### Discrepancies observed and corrected (if any)

### Discrepancies observed and outstanding (if any)



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**Examples of good practice, for information to Scheme Group**

**For attention to Scheme Group: (remarkable practices, not conflicting with EECS Rules)**

**Recommendation(s) to the Scheme Group**



*'We declare that the review process has been conducted in accordance with the guidelines from EECS Subsidiary Documents 01 and 07.'*

Reviewer	Date and signature

On behalf of the reviewed Member: *'I declare that the content in the Domain Protocol is in line with the practice in this Domain, and that the provisions of the EECS Rules are being adhered to.'*

<b>Name</b>	
<b>Date and signature</b>	
<b>Comments</b>	

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## SECTION 5. REVIEW PLANNING

TO BE COMPLETED BY THE ASSESSMENT PANEL

<b>Agenda</b>	
<b>Checklist</b>	
<b>Topics for next review:</b>	A – Follow up  B – Topics to be covered



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## SECTION 6. SUGGESTIONS FOR AMENDMENTS

Suggestions by the reviewers or by the reviewed Member for changes to the EECS framework, to be completed by the Assessment Panel

### Suggestions for amendments of the DP template

### Suggestions for amendments to the EECS Rules

### Suggestions for amendments to the Hub

### Other suggestions for amendments

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## SECTION 7. GUIDELINE FOR SCHEME GROUP DECISION PAPER

The decision paper to be brought before the Scheme Group should ideally be one or two pages and have the following structure:

1. General presentation of the reviewed member
  - a. Member/applicant name: ...
  - b. Member/applicant geographic domain/country: ...
  - c. Status of the member, function in the energy sector (regulator, market operator, governmental agency, TSO, etc.)
  - d. The member's responsibilities with regards to GOs and disclosure (issuing body, disclosure competent body, GO auction organiser, etc), main ownership structure (private company, governmentally owned, etc),
  - e. Indication of size of the registry (e.g. "more than 1000 account holders" / "45 account holders", ...),
  - f. Date of latest legislation update on GOs
  - g. Status and specifics of the disclosure system: how are consumers informed of the origin of their energy and how is this supervised, extent to which this is embedded in legislation,
  - h. Support system characteristics,
  - i. Amount of registered production devices,
  - j. Amount of GOs issued in previous calendar year
  - k. Any other information of relevance.
2. Main findings of the review
3. Description of the main findings of the review and how issues were resolved. Summarise not only the problems detected but also examples of best practices and the practices that are remarkable and of interest to the AIB members. Also list the relevant changes that were applied to the Domain Protocol, compared to the previous version. Confirmation by reviewer on assessing avoidance of double disclosure and double counting.
4. Mention the audit/review date, the date of the previous audit, and the date Scheme membership was first granted.
5. Recommendation to the Scheme Group
6. (if applicable) "Members are recommended to approve (1) the review/audit and (2) the Domain Protocol and (3) the Scheme Membership to EECS xxx Scheme." "Members are asked to discuss the way forward with the described discrepancies." Etc.
7. Formulation of the required decision
8. Annexes to this paper should be
  - a. The Observation Register (see Section 3 of the Review Report);
  - b. Report format (see Section 4 of the Review Report);
  - c. Review planning (see Section 5 of the Review Report);
  - d. Suggestions for amendments (Section 6 of the Review Report);
  - e. The adapted Domain Protocol;
  - f. The changed STC (if applicable);
9. Updates to legislation and documentation regarding the Domain on the AIB website