

Country: SERBIA		Author:	
	Actual implementation in the MS	Comments	
Date: (2023/01/26)			
GENERAL			
	Disclosure system implemented	Yes	
	- Legislation	Disclosure Regulation http://www.ems.rs/media/uploads/2018/Garancije%20porekla/Disclosure_Regulation_Serbian_Do.pdf	
	- When did the regulation(s) regarding disclosure come into force?	27th of October 2017	
	- Competent Body (who is and since when?)	Competent Bodies (since 27th of October 2017): - for National Residual Mix calculation - EMS JSC Belgrade; - for calculation control and verification - Energy Agency of the Republic of Serbia	
	RE-GO system implemented	Yes	
	- Legislation	Regulation on Guarantee of Origin http://www.ems.rs/media/uploads/2018/Garancije%20porekla/Regulation_on_Guarantee_of_Origin.pdf	
	- Competent Body (who is and since when?)	EMS JSC Belgrade (since 8th of September 2017):	
	- Is the appointed Competent Body the only competent body in your domain for Gos (Who and When)?	EMS JSC Belgrade is Competent Body only in the domain of Serbia	
	CHP-GO system implemented	No, expected in 2023	
	- Legislation	- The law on energy efficiency and rational use of energy, Articles 84-88 http://www.ems.rs/media/uploads/2022/Garancije%20porekla/Guarantees_of_origin_for_highly_.pdf - No CHP-GO secondary legislation in place	

Country: SERBIA		Author:	
		Actual implementation in the MS	Comments
Date: (2023/01/26)			
	- Competent Body (who is and since when?)	- EMS, from 22.04.2021. but no secondary legislation implemented	
	- Is the appointed Competent Body the only competent body in your domain for Gos (Who and When)?	Yes, EMS JSC Belgrade, from 22.04.2021. (written in The law on energy efficiency and rational use of energy, Articles 84-88)	
ID	Implementation of the elements of the Directive Related to GOs		
Definition			
	The sole function of a GO is the usage for disclosure purposes for final customers.	Yes (Article 9, Regulation on Guarantee of Origin)	
Implementation of Article 19 of the Directive			
	Have you fully implemented the requirements of Art. - 19 of the RES-Directive?	Yes	
	If not, please specify the ones which you have not implemented yet.		
ID	RE-DISS BPR		
12th Month Rule			
1a	Metered production periods for issuing GOs are not longer than a calendar month.	Yes	
1b	Metered production periods for issuing GOs do not run across the start and end of disclosure periods. Longer intervals up to one year are acceptable for very small plants, for example.	Yes	
2	If possible, issuing of GOs is done DIRECTLY after the end of each production period (potential exemption PV)	Almost in line	
3a	Lifetime of GO is limited to 12 months after the end of the production period.	Yes	

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		Actual implementation in the MS	Comments
<i>Date: (2023/01/26)</i>			
3b	GOs that have reached this lifetime (and haven't been used for disclosure) are collected into the Residual Mix	Yes	
5a	Cancellations of GO relating to production periods in a given year X which take place until a given deadline in year X+1 count for disclosure in year X. Later cancellations count for disclosure in year X+1. (In case that disclosure periods differ from the calendar year, the deadline is defined accordingly.)	Yes	
5b	Deadline is set on 31 March X+1	Yes	
6	The same allocation rule applies for expired GO: The date of expiry thus determines the disclosure period for which information from expired GO will be used.	Yes	
Usage of EECS			
7	The implementation of GO in all countries in Europe is based on the European Energy Certificate System (EECS) operated by the Association of Issuing Bodies (AIB). In case that national GO systems are established outside the EECS, then EECS is at least used for transfers between registries.	Yes	
7a	Is the GO system in the country established exclusively according to EECS?	Yes (national GO existed until becoming member of AIB)	
7b	Does the domain utilise the AIB Hub for international transfers?	Yes	
8	In case that not all European countries are members of EECS, appropriate connections between the EECS system and non-EECS members as well as between different non-EECS members are to be established. These include inter alia procedures for assessing the reliability and accuracy of the GO issued in a certain country and interfaces for the electronic transfer of GO.	No - Currently Serbia is not EU country and put all efforts on AIB relationship. No request to adapt own system to non-EECS members.	

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		Actual implementation in the MS	Comments
<i>Date: (2023/01/26)</i>			
8	Ex-domain cancellations of GO, where a GO is cancelled in one registry and a proof of cancellation is then transferred to another country in order to be used there for disclosure purposes, are only used if there is no possibility for a secure electronic transfer and if there is an agreement on such ex-domain cancellations between the competent bodies involved. Statistical information on all ex-domain cancellations are be made available in order to support Residual Mix calculations.	No EDCs currently in place	
Issuing of GOs for different energy sources and generation technologies			
10,1	GOs are issued only for the net generation of a power plant, i.e. gross generation minus the consumption of all auxiliaries related to the process of power production. For hydro power plants involving pumped storage this means that GOs are issued only for the net generation which can be attributed to natural inflow into the reservoir.	Yes	
10,2	Verification mechanisms are implemented for ongoing control of registered data (e.g.reaudits, random checks, etc.).	Yes	
10,3	Correct accounting of RES share of combustion plants is assured by adequate measures (EECS Rules)	Yes	
10,4	The competent body can correct errors in GOs it has issued before they are exported, and is the only one with this competence.	Yes	
11a	The GO system is extended beyond RES & cogeneration to all types of electricity generation.	No	
11b	GOs are issued for all electricity production, unless an RTS applies for that production, e.g. for the disclosure of supported electricity	No	
11c	The Competent body has made the use of GOs mandatory for all electricity supplied to final consumers (full disclosure implemented).	No	
12,1	All types of GO are handled in one comprehensive registry system per country. (For an exception see the coexistence of national GO systems and EECS)	Yes	

Country: SERBIA		Author:	
		Actual implementation in the MS	Comments
<i>Date: (2023/01/26)</i>			
12,2	Technical changes to plants are registered as soon as is reasonably practicable.	Yes	
13,1	GOs have no function in terms of target compliance and should not be used as support instrument. All GOs are linked to disclosure.	Yes	
13,2	A GO is considered as being used only once it has been electronically cancelled.	Yes	
13,3	After cancellation, no further cancellation, transfer or export of the given GO is possible	Yes	
13,4	After expiry, no further cancellation, transfer or export of the given GO is possible	Yes	
13,5	An exported GO is marked as removed from the exporting registry	Yes	
13,6	Processes in the registry excludes duplication of GOs.	Yes	
13,7	Registries are audited on a regular basis.	Yes	
14 b	If multiple certificates are to be issued, e.g. a GO for disclosure and a support certificate for management of a support system, then these are legally separated.	NA	
15 b	This GO combines the functionalities of a RES-GO and a high efficiency cogeneration GO.	No	
<i>GO as the unique "tracking certificate"</i>			
16	GO is the only "tracking certificate" used. Any other tracking systems of a similar purpose and function as GO are closely coordinated with GO and eventually converted to GO.	Yes	
17	Besides GO, only Reliable Tracking Systems (which may include contract based tracking) and the Residual Mix is available for usage for disclosure. No other tracking mechanisms are accepted.	Yes	
18	Green power quality labels use GO as the unique tracking mechanism.	Yes. In Serbia only GOs can be used for tracking of electricity, so only grid users who consume renewable electricity with GOs can use green labeling because they have proof.	

Country: SERBIA		Author:	
		Actual implementation in the MS	Comments
Date: (2023/01/26)			
<u>Recognition of GO imported from other countries</u>			
20.a.	<p>European countries choose one of the two following options and apply it consistently for all foreign GO :</p> <p>- Rejection of GOs only relates to the cancellation of GOs and subsequent use for disclosure purposes in the respective country and does not restrict the transfers of GOs between the registry of the considered country and the registries of their countries. This means that the decision about the recognition of a GO does not hinder its import into the considered country.</p> <p>- Rejection of GOs implies blocking their import to the national registry.</p>	Yes - first option is applied.	
20.b.	The choice of one or the other option is transparent for all market parties and clearly communicated.	Yes	
21	Within the rules set by the respective Directives, European countries consider their criteria for the acceptance of imported GOs for purposes of disclosure.	Yes	
	These criteria address imports at least from all EU member states, other members of the European Economic Area (EEA) and Switzerland. The parties to the Energy Community Treaty are considered as well, as soon as GO imports from these countries become relevant.	Yes - As we are Energy Community member we accept all EECS-Gos from EU member states and EEA and CH.	
	The criteria specify the electronic interfaces, data format and contents of GOs to be imported, which the respective country accepts for imports of GOs (such as the EECS Hub).	<p>Yes, we accept every EECS-GO transferred through AIB Hub via electronic means. GO should be consisted of information which is prescribed by law:</p> <ol style="list-style-type: none"> 1) name, location, type and production capacity; 2) the date of commissioning of the energy facility; 3) the fact that the guarantee of origin relates to electricity; 4) the start date and the end date of the electricity production for which the guarantee of origin is issued; 5) information on the use of investment support and type of support for the production capacity; 6) information on whether the incentive measures and types of incentives have been used; 7) date and issuance country of the guarantee of origin and a unique identification number; 	

Country: SERBIA		Author:	
		Actual implementation in the MS	Comments
<i>Date: (2023/01/26)</i>			
	Conditions for the recognition of GOs from other countries are that they were issued based on Art. 19 of Directive 2018/2001/EC or compatible national legislation, and that they meet the explicit requirements set in Art. 19, for example, regarding the information content of the GOs.	Because Serbia is non-EU country the Directive is not applied to Serbia, but Serbia prescribed all data about recognition in law acts.	
	The recognition of GOs from other countries is rejected if these countries have not implemented an electricity disclosure system.	Yes - Serbia accepts all the GOs from AIB member countries, unless they are not from renewable sources. As all AIB members must have disclosure system we deem the answer Yes.	
	The recognition of GOs from other countries is rejected if the country which has issued the GOs or the country which is exporting the GOs have not implemented appropriate measures which effectively avoid double counting of the attributes represented by the GOs. Such appropriate measures ensure the exclusivity of the GOs for representing the attributes of the underlying electricity generation, implement clear rules for disclosure, establish a proper Residual Mix or equivalent measures, and ensure their actual use. Furthermore, the appropriate measures ensure that attributes of exported GOs are subtracted from the Residual Mix of the exporting country and cannot be used for disclosure at any time in the issuing or the exporting country by explicit mechanisms, unless the GOs are re-imported and cancelled there.	Yes - Serbia accepts all the Gos from AIB member countries, unless they are not from renewable sources. As all AIB members must have reliable tracking systems which is checked occasionally.	
Disclosure Schemes and other Reliable Tracking Systems			
22	Full disclosure schemes are implemented, including the disclosure of CO ₂ emissions and radioactive waste.	No	

Country: SERBIA		Author:	
		Actual implementation in the MS	Comments
<i>Date: (2023/01/26)</i>			
24	RTS (Reliable Tracking Systems) can comprise, where applicable: - Homogeneous disclosure mixes for regulated market segments where no choice of supplier or different products exists, - Support systems whose interaction with disclosure requires a certain allocation of the attributes of supported generation (e.g. a pro-rata allocation to all consumers in a country where RES electricity is supported by a feed-in tariff), - Contract based tracking	Yes	
Calculations of Residual Mixes			
25	Where a full-disclosure system has not been implemented in the country, the countries provide a Residual Mix (RM) as a default set of data for disclosure of energy volumes for which no attributes are available based on cancelled GO or based on other Reliable Tracking Systems. The use of uncorrected generation statistics (e.g. on national or UCTE, Nordel etc. levels) are avoided.	Yes	
26a	The calculation of the Residual Mix follows the methodology developed in the RE-DISS project and taken over by the AIB.	Yes	
26b	The Competent body from my country cooperates with AIB in order to adjust the Residual Mix in reflection of cross-border transfers of physical energy, GO and RTS.	Yes	
27	For purposes of this cross-border adjustment, the competent body uses data provided by RE-DISS. The competent body also supports the collection of input data for the related calculations by the AIB (and its consultant).	Yes	
28	As a default, the Residual Mix is calculated on a national level. However, in case that electricity markets of several countries are closely integrated (e.g. in the Nordic region), a regional approach to the Residual Mix may be taken. This should only be done after an agreement has been concluded amongst all countries in this region which ensures a coordinated usage of the regional Residual Mix.	Yes	
Contract based tracking			

Country: SERBIA		Author:	
		Actual implementation in the MS	Comments
<i>Date: (2023/01/26)</i>			
29	If contract based tracking (CBT) is allowed in a country, it is regulated clearly and declared in the domain protocol.	NA	
30	Such regulations ensure that - The rules of the tracking system are transparent and comprehensive and are clearly understood by all participants in the system. - Double counting of attributes and loss of disclosure information is minimised within the contract based tracking scheme and also in the interaction of the contract based tracking scheme to GO and other RTS (if applicable). As a precondition for this, the contract based tracking scheme is able to provide comprehensive statistics about the volumes and types of electricity attributes which are tracked through it. - The relevant information for disclosure purposes is available in time to meet the timing requirements	NA	
Timing of Disclosure			
33	Electricity disclosure is based on calendar years.	Yes	
34	The deadline for cancelling GO for purposes of disclosure in a given year X is 31 March of year X+1.	Yes	
Further Recommendations on Disclosure			
36	The relation between support schemes for RES & cogeneration on the one side and GO and disclosure schemes on the other side are clarified. Where necessary, the support schemes should be defined as RTS	Yes - The main support scheme in Serbia is FIT (Feed-in tariff). This scheme is funded by a Public Service Obligation levy charged to all end customers and is administered by the Ministry and Guaranteed supplier. Production Devices in receipt of support for ongoing production of electricity (Feed-in-tariff) do not receive EECS-GO in Serbia. In terms of the annual Fuel Mix Disclosure calculation, the attributes of these renewable Production Devices are assigned to each end consumer in Serbia through its supplier.	
37	If support schemes are using transferable certificates, then these certificates are separated from GO	NA	

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		Actual implementation in the MS	Comments
<i>Date: (2023/01/26)</i>			
38	All electricity products offered by suppliers with claims regarding the origin of the energy (e.g. green or low-carbon power) are based exclusively on cancelled GO. No other tracking systems are allowed, with the exception of mechanisms defined by law, e.g. a pro-rata allocation of generation attributes to all consumers which is related to a support scheme.	Yes	
39 a	As required by Annex I of the IEM Directive 2019/944/EC annual disclosure of the supplier mix on or with the bill is mandatory. This also includes information on environmental impacts.	Almost in line	
39.b	Suppliers offering two or more products which are differentiated regarding the origin of the energy are required to give product-related disclosure information to all their customers, including those which are buying the “default” remaining product of the supplier.	Almost in line - The product mix is given besides the supplier mix only if a specific product has been chosen. The supplier is not requested to disclose the default product mix.	
40	There are clear rules for the claims which suppliers of e.g. green power can make towards their consumers. There are rules on how the “additionality” of such products can be measured (the effect which the product has on actually reducing the environmental impact of power generation), and suppliers are required to provide to consumers the rating of each product based on these rules.	No	
41	Claims made by suppliers and consumers of green or other low-carbon energy relating to carbon emissions or carbon reductions are regulated clearly. These regulations avoid double counting of low-carbon energy in such claims. A decision is taken whether such claims should adequately reflect whether the energy purchased was “additional” or not.	No	
42	In case that suppliers are serving final consumers in several countries rules are developed and implemented consistently in the countries involved on whether the company disclosure mix of these suppliers relates to all consumers or only to those in a single country.	NK	
43	The following recommendations are followed with respect to the relation of disclosure to cooperation mechanisms (Art - 13 of Directive -2018/2001/EC):		

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		Actual implementation in the MS	Comments
<i>Date: (2023/01/26)</i>			
	a) If EU MS or MS or any other country agree on Joint Projects, such agreements also clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the respective power plants	No	
	b) If EU MS agree on Joint Support Schemes, such agreements clarify the allocation of attributes (via GO, RTS or Residual Mix) issued from the power plants supported under these schemes	No	

Information on the Recognition of GO			
Extra questions on recognition of GO			
	<i>Does the Domain treat imported GO as national GO when it comes to disclosure? If so, please specify.</i>	Yes - no differentiation	
	<i>Does the Domain have criteria in place for accepting foreign GO for disclosure?</i>	Yes - criteria exist and that criteria is that foreign GOs come from AIB member (who follows EECS).	
	<i>- If yes, please specify the criteria which are in place</i>	Criteria exist and that criteria is that foreign GOs came from AIB member (who follows EECS).	
	<i>Since when do you have these criteria in place?</i>		
	<i>Are the criteria transparently published in your country?</i>		

Information on Environmental Parameters			
	What are the data basis for disclosing CO ₂ emissions and radioactive waste when using GOs or other Reliable Tracking Systems for disclosing specific supplier mixes?	No disclosure of CO ₂ emissions and radioactive waste information.	

Information on Disclosure aspects			
	Extra questions regarding the provision of disclosure information on a disclosure statement towards end consumers		

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<i>Date: (2023/01/26)</i>		
Are there any regulations on graphical display of disclosure information by suppliers (requirements on how to display, fixed format of disclosure statement, ...)	Disclosure regulation describes the data to be displayed by the supplier in Disclosure Regulation, Suppliers Report section, with a pie chart, representing the shares of individual energy sources by circular clippings, presenting shares in percentages on two decimal points (http://www.ems.rs/media/uploads/2018/Garancije%20porekla/Disclosure_Regulation_Serbian_Do.pdf).	
Is there a requirement to provide comparison values besides supplier and product mix? If so, which one (e.g. national production mix)	Suppliers are obliged to give consumers link to Residual mix report	
Is disclosure information somehow controlled by an official or independent institution? By whom? If so, is it audited or approved or calculated by that body?	Disclosure is checked by Energy Agency of Republic of Serbia	
Is disclosure information of different suppliers centrally available (e.g. at the Competent Body, on a central website)?	No	
Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.	No	
Is there a specific regulation on disclosure of (high-efficient) CHP in your domain?	No but it is expected in 2023.	