

France	Electricity	Natural Gas including (bio)methane	Space for comments	
	EEX	EEX		
	Actual implementation in the MS	Actual implementation in the MS		Instructions for assessment/explanations
	7-7-2025	29-9-2025		

## Section A

### Legislation

#### Implementation of Article 19 (8) of the Directive 2018/2001 and amended with 2023/2413

Have you fully implemented the requirements of Art. 19 (8) of Directive 2018/2001(EU) amended with 2023/2413(EU)	Yes	Not yet		If GOs are cancelled for disclosure period 1.4.Y to 31.3.Y+1, is it required that GOs with a production period within those limits are used? Yes/No
- If not, please specify which elements you have not implemented yet.		No calculation of the residual mix yet. Linked to that: no consumption rule in place yet.		Please specify

#### Timing of disclosure

Do the production period on the GO and the disclosure period coincide?	Yes	No		Yes/No
Are GOs valid for transactions for more than 12 months after the production of the energy unit?	No	Yes		Yes/No
- If yes, please specify		GOs can be cancelled 18 months after the production period. Transfers are only possible until 12 months after the production period.		Please specify
Do GOs that have not been cancelled expire at the latest 18 months after the production of the energy unit?	Yes	Yes		Yes/No
- If no, please specify	after 12 months	GOs expire after 18 months.		Please specify
Are expired GOs collected into the Residual Mix (by fulfilling the statistic requirements of AIB)?	Yes	Not applicable		Yes/No
- If no, please specify		No calculation of the residual mix yet		Please specify
When is the deadline for disclosure?	Not mandatory deadline but advised for 31 March X+1	N/A		please specify; ex. 31 March Year X+1

Recognition of GOs from other countries				
Do you have criteria in place for accepting foreign GO for disclosure?	No	Yes	information if GOs have already been accounted within the ESR (Effort Sharing Regulation)	Yes/No
- If yes: Are the criteria transparently published in your country?		Yes, in the French Energy Code: <a href="https://www.legifrance.gouv.fr/codes/texte_lc/LEGITEXT000023983208">https://www.legifrance.gouv.fr/codes/texte_lc/LEGITEXT000023983208</a>		Please specify and indicate where those are published. If electronically please provide a link.
Do you accept imported GOs for disclosure from all EU member states and other members of the European Economic Area (EEA)?	Yes	No		Yes/No
- If no, please name the countries from which you do not accept imported GOs for disclosure		France cannot accept GOs without an indication of whether the reduction of greenhouse gas emissions associated with the production of Output to which the GOs relate, qualifies for accounting under the Emission Trading System or the Effort Sharing Regulation (ETS-ERS Eligibility Tag)		Please specify
- If yes, please specify the reasoning for accepting	RED2			Please specify
Do you accept imported GOs from parties to the Energy Community Treaty?	No	No		Yes/No
- If yes, please name the countries from which you do import				Please specify
- If yes, please specify the reasoning for accepting				Please specify
Do you accept for disclosure imported GOs from other countries than EU and EEA?	No	No		Yes/No. This question is merely oriented towards countries from EU and EEA, but others are welcome to fill in
- If yes, please name the countries from which you accept imported GOs for disclosure				Please specify
- If yes, please specify the reasoning for accepting				Please specify
Does the customer get information on the country of origin of the GOs in the disclosure statement?	Yes	Yes		Yes, please specify where and how/No
Energy Storage				
Can storage prolong the lifetime of a GO for more than 12 month after the production of the energy unit?	No	Not applicable		Please describe
Does your system facilitate "Storage Issuance" (= cancel GOs for the input into storage and issue GOs for the storage output, with new production period?)	No	No		Yes/No
- If yes, do you provide separate cancellation statistics for energy that goes into storage?				Please describe

- If yes, do GO issuance statistics have a separate category for energy released from storage?				Please describe
<b>Member States reporting to EC on GO statistics and renewable energy consumption</b>				
Which principles do you use to report GO statistics and renewable energy consumption in Annex XVI of the Commission Implementing Regulation (EU) 2022/2299?		No statistics reported on renewable gas		<a href="#">Link to Commission Implementing Regulation</a>
Do the reported figures differ from your published GO statistics?		Not applicable		Yes/No
- If yes, how do they differ?				Please describe
Do the reported figures differ from the reported consumption data for the annual residual mix exercise?		Not applicable		Yes/No
- If yes, how do they differ?				Please describe

## Issuing and cancelling of Guarantees of Origin

<b>Unit of energy represented by a GO</b>				
Is the unit of a GO MWh?	Yes	Yes		Yes/No
Do you use smaller units than MWh for GOs?	No	No		Yes/No
Is the <del>standard</del> size for smaller size GOs equal to 1 Wh?	Not applicable	Not applicable		Yes/No
- If no: please specify				please specify
<b>Usage of ex-domain cancellations</b>				
Do you issue your GOs under the European Energy Certificate System (EECS) of AIB?	Yes	Yes		Yes/No
Do you allow for ex-domain cancellations, which means cancelling a GO in your registry for the usage in another registry?	Yes	Yes		Yes/No
- If yes, please describe under which conditions?	Only 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.	Only if there is no possibility for a secure electronic transfer and if there is an agreement on such ex-domain cancellations between the issuing bodies.		please describe
- If yes, are ex-domain cancellations reported to the AIB for statistical purposes?	Statistical information on all ex-domain cancellations are made available in order to support Residual Mix calculations.	Not yet		Yes/No
How do you ensure that GOs, cancelled for another domain, are not also claimed for consumption in your own domain?	It is written on the certificate in which country the consumption is claimed	It is written on the certificate in which country the consumption is claimed.		please describe
<b>Production data sources</b>				

What is the data source for production data?	The measurement bodies send the data on a monthly basis or AH send the meters data via API directly from DSO/TSO portal in case of wrong data from the measurement bodies with annual check with DSO/TSO	The measurement bodies send the data on a monthly basis to EEX. EEX then validates the issuance of GOs.		Please specify
- If possible, link to data source				Please specify the website for the data source and which party is in charge
When are the statistics based on production measurement data available for calendar year X?	Every day on the EEX website filtering on issuance transaction	EEX publishes a public report on an annual basis end of March with information about GOs that have been issued, transferred and canceled.		Please specify yearly deadline
Is production data available with (sub)hourly granularity?	No	No		Yes/No
- If yes, which production categories?				Please specify
- If yes, what is the granularity of the data?				10mins/15mins/20mins/...
- If yes, how long after the production period is the data available?				Please specify

#### GO usage per system boundary

Do you have rules in place that restrict the usage of GOs to a certain system boundary?	Yes	Not applicable		Yes /No (E.g. are there restrictions for where to use electricity GOs? Can hydrogen GOs be used for consumption from the natural gas grid? Can biomethane GOs be used for consumption from a hydrogen grid? Any specifics on vehicle transported gases? Restrictions on where heating and cooling GOs can be used? e.g. can heating and cooling GOs be exported? can they be used on another heating grid than where they were produced? etc)
- If yes, please specify		No GOs for hydrogen and heating and cooling in France (yet).		Please specify
Does your member state provide GO cancellation statistics for energy that changes dissemination level during its chain of custody?		Not applicable		Yes/No
Do you distinguish different types of GO cancellations: cancellations for final energy consumption vs. GO cancellation for input into energy carrier conversion, for storage, or other?		No, only cancellations for final energy consumption		Yes/No/Please specify
Does your member state provide statistics on GOs that are cancelled for input into energy carrier conversion (= for GO Conversion Issuance)?		Not applicable		Yes/No

Link to the detailed cancellation statistics		Registry data is published on a monthly basis here: <a href="https://www.eex.com/en/markets/energy-certificates/french-biogas-gos">https://www.eex.com/en/markets/energy-certificates/french-biogas-gos</a>		Please provide weblink
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## Disclosure

### General

Does your member state have a disclosure obligation for origin of supplied/comsumed energy?	Yes	No		Yes/No
- If yes, To which economic operators does it apply?	Suppliers			Please specify (categories like: regulated suppliers, corporate consumers, all, ...)
- If yes, Under what rules it is governed?	Energy code R311-64			Please name the relevant regulations and provide a reference (preferably a version in English)
who is the Competent Body in charge for the supervision of disclosure?	Direction Générale de l'Energie et du Climat (DGEC) - Energy ministry	Direction Générale de l'Energie et du Climat (DGEC)		Please specify name
- Under which legal nomination (law/decreet/decision) are they appointed as competent body?				Provide reference to legal nomination
Are GOs the only instrument for disclosing known origin in disclosure statements to final customers?	Yes	No	However, it is only possible to issue a GO <del>OR</del> a Biogas Production Certificate (CPB).	Yes/No
- If no, please specify the other instruments		According to Article L446-18 of the French Energy Code, not only GOs but also Biogas Production Certificates (CPBs) can certify the origin of biogas.		Please specify
Which measures are in place for supervision of suppliers regarding their disclosure of the origin of the gas of their supply?		The DGCCRF (Directorate-General for Competition, Consumer Affairs and Fraud Control) is responsible for checking the declarations of gas volumes supplied by suppliers. Checks are not systematic but rather ad hoc. Furthermore, the CPB mechanism imposes an obligation on French gas suppliers to produce biogas and issue certificates (or to buy certificates) and to reconstitute a certain number of certificates on an annual basis to the French State.		Gas only, please describe

Do suppliers submit samples of their invoices to the disclosure supervisor?		Yes	The administration requests supporting documents, including invoices, as part of these checks.	Yes/No. Disclosure supervisor for <b>electricity</b> : the authority supervising the obligation on suppliers to inform their clients about their supplier mix and product mix according to Electricity Directive 2019/944, Annex I, Article 5 Disclosure of energy sources.
Is there a public report on the result of the disclosure supervision?		Not sure, see comment	No public report, but investigations: <a href="https://www.economie.gouv.fr/dgccrf/laction-de-la-dgccrf/les-enquetes/deux-fournisseurs-deelectricite-et-de-gaz-naturel-controles">https://www.economie.gouv.fr/dgccrf/laction-de-la-dgccrf/les-enquetes/deux-fournisseurs-deelectricite-et-de-gaz-naturel-controles</a>	Yes/No
- If yes, where can it be found?				Please specify
If a supplier is active in multiple Member States: does the supplier mix in your country/region account for this?		No	No disclosure obligation	Yes/No
- If yes: how does this influence the supplier mix in your country/region?				Please specify

#### Customer-specific disclosure

Can a consumer cancel their own GOs?	Yes	Yes		Yes/No.
Can other parties than licensed suppliers cancel GOs?	Yes	Yes		Yes/No.
When offered energy products include claims on the origin of the energy, are they always exclusively based on cancelled GOs?	Yes	No		Yes/No
- If no: please specify		It is possible to include claims based on CPBs.		please specify: when are deviations possible, what are claims based on otherwise.

#### Calculations of Residual Mixes

Gas only: Does your Member State calculate the residual mix for gases?		No		Yes/No
- If yes, which method is used to determine this?				Please specify
- If yes, who calculates the Residual Mix in your Member State?				Name of organisation
- Weblink to the results of the national publication of the residual mix				weblink or explanation from when onwards this is expected
Electricity only: Do you use the data of the Residual Mix calculated by the AIB?	Yes			Yes/No
- If no, please specify which data you use?				Please specify

#### Information on Disclosure communication

Is the annual disclosure of the supplier mix displayed on the energy bill?	Yes	Not yet		Yes/No
- If no, please specify where it is displayed.				Please describe
Is disclosure information of different suppliers centrally available (e.g. reports) ?		Not yet		Pls. Provide short explanation plus reference to website/regulation.
If not, how is such consumption demonstrated and how is it reflected in the residual mix?		No calculation of the residual mix for gases yet.		
Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.		Article L. 229-61 of the French Environment Code prohibits the promotion of fossil fuels, including natural gas.		Pls. Provide short explanation plus reference to website/regulation.
<b>Consumption data</b>				
What is the data source for consumption data?		Registry data is published on a monthly basis here: <a href="https://www.eex.com/en/markets/energy-certificates/french-biogas-gos">https://www.eex.com/en/markets/energy-certificates/french-biogas-gos</a> The list contains, among other things, information on cancelled GOs (cancellation counterparty and date).		Please specify
- If possible, link to data source				Please specify the link to the data source
When are the statistics based on consumption measurement consumption data available for the calendar year X?		Currently, when cancelling a GO, it is possible to choose a consumption period (there is no rule in place). The following rule will be implemented soon: The consumption period associated with the use of a GO must cover at least part of the period of validity of the GO, meaning that the consumption must be partly within the twelve months from the end date of injection. This consumption period may not exceed one year.		Please specify
<b>Timeline of disclosure</b>				
When is the residual mix communicated to suppliers?	Before June 15	no calculation of the residual mix yet		Indicate approximate timing every year
When do suppliers provide disclosure figures (product mixes) to the disclosure authority?	before 31/12 of the same year for previous year	Not applicable		Indicate approximate timing every year
When does the disclosure authority validate and publish the disclosure figures: product mixes, supplier mixes, other disclosure mixes (if applicable)?	Before June 15	Not applicable		Indicate approximate timing every year

When do the suppliers inform their clients about the disclosure figures?	ASAP residual mix published no later than 31/12 for N-1 year	Not applicable		Indicate approximate timing every year. E.g., is it by the 1st September of year X+1 for disclosure figures of year X or another deadline?
<b>Union Database (UDB) and disclosure supervision</b>				
Will a link between GO Registry and UDB be provided in your domain?		Not sure, see comment	Not defined yet.	Yes/No
- If yes: which institution/authority will provide this?				Please provide name of institution/authority
Will the Disclosure Competent Body have access to the UDB?		Not sure, see comment	There is no Disclosure Competent Body for gases yet.	Yes/No
What mechanism is in place for the interaction between the GO registry and the UDB?		Not yet	Not defined yet.	Please describe
- If none yet, what ideas or plans are there regarding the future for this interaction between GOs and UDB?		Not sure, see comment	Not defined yet.	Please describe
Is data from the Union Database for sustainable biofuels checked to confirm the location of renewable energy consumption?		Not sure, see comment	Not defined yet.	Yes/No
- If yes, please describe the principles of this check				Please describe
Is a consistency check done regarding information in the UDB and the beneficiary of cancelled GOs for the same gas?		To be defined.	Not defined yet.	Please describe

## Other issues

<b>Full disclosure</b>				
Have you implemented a full disclosure system in your country?	Yes	Not yet		Yes/No
- If yes, since when?	yes as optional since			Please specify date of entry into force
<b>Purposes of the GO</b>				
Do GOs have a function in terms of target compliance and are used as support instrument?	No	Yes	A certain percentage of the GOs issued for installations that receive a support by the French State is automatically accounted with the Effort sharing Regulation (ESR). This ratio is recalculated on an annual basis by the French State.	Yes/ No (in case all GOs are linked to disclosure)



Is a GO the only “tracking certificate” used?	Yes	No		Yes/No
- If no: Are any other tracking systems of a similar purpose and function as GO closely coordinated with GO?	Not applicable	Yes		
- If no: please name the other organisations active in the market (voluntary schemes/non governmental bodies/private initiatives), their role and the task they perform.	Not applicable	EEX also operates the CPBs registry. The CPB mechanism is closely coordinated with GOs.		Please specify
Besides GO, is there only the Residual Mix available for usage for disclosure?	Yes	Not applicable		Yes/No (No meaning there are other tracking mechanisms accepted)
- If no, please specify	Not applicable			Please specify
Are GOs issued for self-consumed energy?	Yes	Not applicable		Yes/No
- If yes: what are the rules on disclosure for such GOs?	to an operation of auto-consumption in the meaning of Article L315-7 of the French Energy Code. In this case, the Production Device should satisfy all conditions stated in Article R311-67 of the French Energy Code and stated in the DP D.3.2.1. ; GOs can be issued both on what has been injected to the grid and on what has been auto-consumed, except the consumption of auxiliaries. EEX would receive the metering data requested in the DP D.3.2.1. On receiving these information, the same procedure would apply as described in the DP E2 for classic production devices. The GOs issued on the production which is not injected to the grid need to be cancelled directly after being issued. They hence cannot be transferred (including exported).			Please specify

#### Regulations on Power Purchase Agreements (PPAs)

In terms of disclosure, how do you treat energy that is bought in a competitive setting or in a long-term power purchase agreement?	Mandatory GO cancellation for claiming green attributes of PPA	Biogas produced within a Biogas Purchase Agreement can be "used" to issue GOs or CPBs		Please describe
Who is responsible for disclosing/cancelling the GOs for competitive settings or long-term purchase agreements?	Depends of the PPA contract	The producer or a mandated organisation		supplier/plant operator/customer? Please specify

## Section B

Information on Environmental Parameters				
Does the supplier mix include information on environmental impacts?	Not applicable	Not yet		Yes/No. Note the legal requirement for such information for <b>electricity</b> : Electricity Directive 2019/944, Annex I, Article 5(b)
Please indicate the data source for disclosing environmental information with the supplier mix?	Not applicable			Please describe how it is done in the Domain
Is there information on the guarantee of origin issued in your domain about meeting sustainability criteria and emission savings?	Not applicable	Not sure, see comment	Partially. GOs that are issued and auctioned in the name of the French State, carry the information on the certificate whether they come from an installation that is certified RED II.	Yes/No
- If yes, in segments where compliance with sustainability and emission saving criteria is required (e.g. transport or heating), do you require that the supply (consumption) in this segment is confirmed by a GO?	Not applicable			Yes/No
- If not, how is such consumption demonstrated and how is it reflected in the residual mix?	Not applicable			please describe
How do you treat sustainability information in disclosure statements?	Not applicable			please describe
Other Reliable Tracking Systems (RTS) and evidence of criteria-compliance like Proofs of Sustainability (PoS)				
Next to GOs, do you also allow other RTS as basis for Disclosure? (ex. Contract based tracking, Residual Mix, tradeable Proofs of Sustainability (PoS), etc)	Not applicable	Yes		Yes/No

- If yes, please describe		<p>The mechanism of CPBs is implemented in the law by Articles L446-31 to L446-55 and R446-96 à 446-104 of the French Energy Code.</p> <p>According to Article L446-18 of the French Energy Code, GOs and CPBs can certify the origin of biogas in order to prove to final consumers the share or quantity of energy produced from those sources contained in the commercial offer contracted with their gas suppliers. For each MWh of biogas injected into the grid, only one certificate can be issued (either a GO or a CPB).</p> <p>The CPB mechanism imposes an obligation on French gas suppliers to produce biogas and issue certificates (or to buy certificates) and to reconstitute a certain number of certificates on an annual basis to the French State.</p> <p>CPBs can only be issued for nonsubsidized biogas.</p> <p>CPBs cannot be exported to other countries.</p>		
	Not applicable			Please describe
- If yes, are they treated in a way that is legally separated from GOs?	Not applicable	No		Please describe
How do Proofs of Sustainability interact with the GO system?	Not applicable	<p>No legislation for PoS yet.</p> <p>"Small" installations (production capacity of less than 19.5 GWh per year) are not concerned by the certification.</p>		Please specify if GO and PoS are either 1) issued separately (please describe), 2) may be connected on an integrated mechanism (please describe how), 3) always only on an integrated document or mechanism (please describe this mechanism), 4) other (please describe)
Do you prohibit statistical data to be used for determining the energy sources of energy obtained from exchanges?	Not applicable	Not applicable		Yes/No
- If no, under what circumstances do you allow statistical data to be used for determining the energy source of energy from an exchange?	Not applicable			Please describe
Do you prohibit statistical data to be used for determining the energy sources of imported energy?	Not applicable	Not applicable		Yes/No

- If no, under what circumstances do you allow statistical data to be used for determining the energy source of imported energy?	Not applicable			Please describe
Who is in charge of collecting statistics for Proofs of Sustainability (PoS) issued in your Domain?	Not applicable	French Ministry in charge of Energy		Please specify
When are the PoS made available?	Not applicable	In principle, as soon as the biomethane is injected.		Please specify the time delay after the end of the energy production period, within which the PoS is made available.
Is it possible to separately issue a PoS and a GO for the same energy production?	Not applicable	Yes		Yes/No
- If no, how is this ensured that only one of the two instruments is provided to a producer?	Not applicable			Please describe
- If yes, can the PoS be allocated to a different consumer than the consumer for whom the GO is cancelled?	Not applicable	A PoS can only be used in combination with a GO for e.g. the EU ETS.		Please specify
- If only a PoS can be issued, how will you ensure that the new obligation for gas suppliers under RED III Article 19(8) is fulfilled?	Not applicable	N/A		Please specify
What measures prevent that a Proof of Sustainability is allocated to a different consumer than the GO that was issued for the same energy? (Double disclosure)	Not applicable	The PoS cannot be used alone.		Please describe