

Finland	Electricity	Natural Gas including (bio)methane	Hydrogen	Other Gas	Heating/Cooling	Space for comments	
	Energy Authority	Energy Authority	Energy Authority	Energy Authority	Energy Authority		
	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS	Actual implementation in the MS		Instructions for assessment/explanations
	28/03/2024	28/03/2024	28/03/2024	28/03/2024	28/03/2024		
<b>General</b>							
Does your member state have a disclosure obligation for origin of supplied/consumed energy?	Yes	Yes	Yes	Yes	Yes		Yes/No
- If yes, To which economic operators does it apply?	All electricity suppliers, producers and users that are marketing electricity produced from renewable energy resources or with nuclear power	All gas suppliers, producers and users that are marketing renewable gas	All hydrogen suppliers, producers and users that are marketing renewable hydrogen	All gas suppliers, producers and users that are marketing renewable gas	All heating and cooling suppliers, producers and users that are marketing renewable heating and cooling or waste heat and cold.		Please specify (categories like: regulated suppliers, corporate consumers, all, ...)
- If yes, Under what rules it is governed?	Act on Guarantees of Origin for Energy (1050/2021)	Act on Guarantees of Origin for Energy (1050/2021)	Act on Guarantees of Origin for Energy (1050/2021)	Act on Guarantees of Origin for Energy (1050/2021)	Act on Guarantees of Origin for Energy (1050/2021)	<a href="https://finlex.fi/fi/laki/kaannokset/2021/en20211050.pdf">https://finlex.fi/fi/laki/kaannokset/2021/en20211050.pdf</a>	Please name the relevant regulations and provide a reference (preferably a version in English)
When did the regulation(s) regarding disclosure initially come into force?	2003-12-19	2021-07-01	2021-07-01	2021-07-01	2021-07-01		Please name the date in which the regulation(s) initially came into force. <b>Date format: YYYY-MM-DD</b>
When was the last revision of the disclosure regulation(s)	2021-12-03	2021-12-03	2021-12-03	2021-12-03	2021-12-03		Please name the date of the last revision of the disclosure regulation(s)
who is the Competent Body in charge for the supervision of disclosure?	Energy Authority	Energy Authority	Energy Authority	Energy Authority	Energy Authority		Please specify name
- Since when are they in charge of supervision of disclosure?	2003-12-19	2021-12-03	2021-12-03	2021-12-03	2021-12-03		Please specify date
- Under which legal nomination (law/decree/decision) are they appointed as competent body?	Act on Guarantees of Origin for Energy (1050/2021)	Act on Guarantees of Origin for Energy (1050/2021)	Act on Guarantees of Origin for Energy (1050/2021)	Act on Guarantees of Origin for Energy (1050/2021)	Act on Guarantees of Origin for Energy (1050/2021)		Provide reference to legal nomination
Are GOs the only instrument for disclosing known origin in disclosure statements to final customers?	Yes	Yes	Yes	Yes	Yes		Yes/No
- If no, please specify the other instruments							Please specify
Which measures are in place for supervision of suppliers regarding their disclosure of the origin of the gas of their supply?							Gas only, please describe
Do suppliers submit samples of their invoices to the disclosure supervisor?	No	No	No	No	No		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.
- If yes, how often?							Please specify frequency
Is there a public report on the result of the disclosure supervision?	No	No	No	No	No		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?	Yes	No	No	No	No		Yes/No
- If yes: how does this influence the supplier mix in your country/region?	Overall energy mix of the electricity sold by the electricity supplier over the preceding year have be provided also concerning electricity sold in the European Union if the electricity supplier operates in more than one Member State.						Please specify

Have you fully implemented the requirements of Art. 19 (8) of Directive 2018/2001(EU) amended with 2023/2413(EU)	Not yet	Not yet	Not yet	Not yet	Not yet		Yes/No
- If not, please specify which elements you have not implemented yet.	Implementation of RED III has not yet started	Implementation of RED III has not yet started	Implementation of RED III has not yet started	Implementation of RED III has not yet started	Implementation of RED III has not yet started		Please specify

Unit of energy represented by a GO							
Is the unit of a GO MWh?	Yes	Yes	Yes	Yes	Yes		Yes/No
Do you use smaller units than MWh for GOs?	No	No	No	No	No		Yes/No
Is the standard size for smaller size GOs equal to 1 Wh?	No	No	No	No	No		Yes/No
- If no: please specify							please specify
Do you differentiate the different units in the disclosure statements? Please explain your methodology	No	No	No	No	No		Yes/No, please specify
- If no: please specify	RED III has not been implemented yet	RED III has not been implemented yet	RED III has not been implemented yet	RED III has not been implemented yet	RED III has not been implemented yet		please specify

Customer specific disclosure							
Can a supplier tailor a dedicated product to a specific consumer?	Yes	Yes	Yes	Yes	Yes		Yes/No.
Can a consumer cancel their own GOs?	Yes	Yes	Yes	Yes	Yes		Yes/No.
Can other parties than licensed suppliers cancel GOs?	Yes	Yes	Yes	Yes	Yes		Yes/No.
Please describe the principles in case any of the above three questions apply, meaning that customer specific disclosure is allowed.							Please describe
Please describe how the customer specific disclosure is executed in the registry?	Customer can apply access to registry.	Customer can apply access to registry.	Customer can apply access to registry.	Customer can apply access to registry.	Customer can apply access to registry.		Please describe the process; do customers have direct access to the registry, do you allow product mixes, etc?
- If yes: Is the Competent Body for disclosure responsible for supervising customer specific statements?	Yes	Yes	Yes	Yes	Yes		Yes/No
- If yes: are there any limitations for customer specific disclosure in place? Please specify	No	No	No	No	No		please specify, e.g.: only customers of a certain size receive customer specific disclosure options, etc.
When offered energy products include claims on the origin of the energy, are they always exclusively based on cancelled GOs?	Yes	Yes	Yes	Yes	Yes		Yes/No, please specify
- If no: please specify							please specify: when are deviations possible, what are claims based on otherwise.
When suppliers are offering two or more products, distinct in origin of energy: are they required to give product-related disclosure information to all their customers, including for the "default" product for those customers who do not choose a specific product?	No	Not applicable	Not applicable	Not applicable	Not applicable		Yes/No. Note that under Electricity Directive 2019/944, Annex I, Article 5, each electricity product must have a product mix. Default product: the product a customer gets if they don't make an explicit choice of supplier and product, in case it is different from other commercial products.
- If no, please specify	Not required by law						please specify

Calculations of Residual Mixes							
Gas only: Does your Member State calculate the residual mix for gases?		No	No	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					European Attribute Mix (EAM) figures	Yes/No
- If no, please specify which data you use?							Please specify

Timing of disclosure							
Do the production periods for issuing GOs coincide with the disclosure periods?	Yes	Yes	Yes	Yes	Yes		Yes/No
Are GOs valid for transactions for more than 12 months after the production of the energy unit?	No	No	No	No	No		Yes/No



Recognition of GOs from other countries							
Do you have criteria in place for accepting foreign GO for disclosure?	Yes	Yes	Yes	Yes	Yes		Yes/No
- If yes: Since when are these criteria in place?	1.1.2004	3.12.2021	3.12.2021	3.12.2021	3.12.2021		Please specify
- If yes: Are the criteria transparently published in your country?	Yes	Yes	Yes	Yes	Yes		Please specify and indicate where those are published. If electronically please provide a link.
Are the conditions for the recognition of GOs from other countries based on Art. 19 of Directive 2018/2001/EC and 2023/2413/EC or compatible national legislation?	Yes	Yes	Yes	Yes	Yes		Yes/No
Do you recognise GOs from other countries that have not implemented a disclosure system?	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable		Yes/No
Do you recognise GOs from other countries that have not implemented appropriate measures to effectively avoid double counting of GOs?	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable		Yes/No
Do you accept imported GOs for disclosure from all EU member states and other members of the European Economic Area (EEA)?	Yes	Yes	Yes	Yes	Yes		Yes/No
- If no, please name the countries from which you do not accept imported GOs for disclosure							Please specify
- If yes, please specify the reasoning for accepting	The GOs issued in accordance with the RED and	The GOs issued in accordance with the RED and	The GOs issued in accordance with the RED and	The GOs issued in accordance with the RED and	The GOs issued in accordance with the RED and consequently		Please specify
Do you accept imported GOs from parties to the Energy Community Treaty?	No	No	No	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	No	No	No		Yes/No. This question is merely oriented towards countries from EU and EEA, but others are welcome to fill in
- If yes, since when?							Please specify
- 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 Domain treat imported GO as national GO when it comes to disclosure?	Yes	Yes	Yes	Yes	Yes		Yes/No
- If no, please specify							Please specify
Does the customer get information on the country of origin of the GOs in the disclosure statement?	Yes	Yes	Yes	Yes	Yes		Yes, please specify where and how/No
Information on Environmental Parameters							
Does the supplier mix include information on environmental impacts?	Yes	Not applicable	Not applicable	Not applicable	No		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?	An electricity supplier shall disclose at least once a year in or with electricity bills information on the quantity of carbon dioxide emissions and radioactive waste resulting from the energy sources used to produce the electricity sold by the electricity supplier over the preceding year.	Not applicable	Not applicable	Not applicable	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?	No	Not applicable	Not applicable	Not applicable	Not applicable		
- 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?							
- If not, how is such consumption demonstrated and how is it reflected in the residual mix?	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable		
How do you treat sustainability information in disclosure statements?	It can be added on voluntary bases	It can be added on voluntary bases	It can be added on voluntary bases	It can be added on voluntary bases	It can be added on voluntary bases		please describe

Information on Disclosure communication							
Is the annual disclosure of the supplier mix displayed on the energy bill?	Yes	No	No	No	No		Yes/No
- If no, please specify where it is displayed.		Not applicable	Not applicable	Not applicable	Not applicable		Please describe
Is disclosure information of different suppliers centrally available (e.g. reports) ?	No	Not applicable	Not applicable	Not applicable	Not applicable		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?	Consumption figure used in residual mix calculation is provided by the Finnish Energy (Association of Energy Industries)						
Is there an official regulation on communication of aspects related to additionality or ecological quality aspects together with disclosure? Please describe.	No	No	No	No	No		Pls. Provide short explanation plus reference to website/regulation.

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?	Same way as the others						Please describe
Who is responsible for disclosing/cancelling the GOs for competitive settings or long-term purchase agreements?	It depends on what kind of agreement they have made.						supplier/plant operator/customer? Please specify

Energy Storage							
Can storage prolong the lifetime of a GO for more than 12 month after the production of the energy unit?	No	No	No	No	No		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	No	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



Who is in charge of collecting statistics for Proofs of Sustainability (PoS) issued in your Domain?		Energy Authority	Energy Authority	Energy Authority			Please name the organisation in charge
When are the data for the PoS made available?	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable		Please specify
Is it possible to issue a PoS and a GO for the same energy production?	Not applicable	Yes	Yes	Yes	Not applicable		Yes/No
- If no, how is this ensured that only one of the two instruments is provided to a producer?							Please specify
- If yes, can the PoS be allocated to a different consumer than the consumer for whom the GO is cancelled?	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Pos and GOs are two different systems.	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?							
How does a GO interact with a PoS, please describe the process/cooperation	Not applicable	PoS and GOs are two different systems.	PoS and GOs are two different systems.	PoS and GOs are two different systems.	Not applicable		Please specify

#### Timeline of disclosure

When is the residual mix communicated to suppliers?	By the end of the June of the following year.						Indicate approximate timing every year
When do suppliers provide disclosure figures (product mixes) to the disclosure authority?	Not applicable. Suppliers shall use the most recent residual mix no later than three months after its publication and publish the mixes according to the Act and the instructions of the Energy Authority.						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)?	Not applicable. The Energy Authority is the supervisory authority referred to in the Act and supervises compliance with the Act and the provisions issued under the Act as well as attends to the other duties laid down for it in the Act.						Indicate approximate timing every year
When do the suppliers inform their clients about the disclosure figures?	No later than three months after the publication of residual mix.						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?

#### GO usage per system boundary

Do you have rules in place that restrict the usage of GOs to a certain system boundary? - If yes, please specify	No	No	No	No	No	There are no system boundaries in place, however the content of the question remains slightly unclear.	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) Please specify
---	----	----	----	----	----	--	--

For Gas GOs, what defines the Network Characteristics for which a certain Gas GO may be cancelled, in line with REDIII art. 19.8?		RED III has not been implemented yet.	RED III has not been implemented yet.	RED III has not been implemented yet.			Please specify
Will you allow cancellation of methane GOs for consumption in a Hydrogen System?		Not sure, see comment	Not sure, see comment	Not sure, see comment		It remains unclear whether "hydrogen system" refers to physical grid or hydrogen GOs.	Please specify
Will you allow cancellation of Hydrogen GOs for consumption in a Natural Gas System?		Not sure, see comment	Not sure, see comment	Not sure, see comment		It remains unclear whether "natural gas system" refers to physical grid or natural gas GOs.	Please specify
Which GOs are allowed for consumption of vehicle transported gases?		All GOs issued for gas are allowed	All GOs issued for gas are allowed	All GOs issued for gas are allowed			Please specify
Which GO usage restrictions apply in relation with the Dissemination Level for which the GO is issued?	An electricity user that produces for its own use	The renewable origin of gas need not, however,	The renewable origin of hydrogen need not,		The origin of energy sold as produced from		(see EECs Fact Sheet 20 for values of Dissemination Level on GOs - Expected to be also in CEN EN16325 annex E)
Does your member state publicly provide GO cancellation statistics per consumption category? - If yes, into which consumption categories are statistics divided?	No	No	No	No	No		Yes/No (e.g. cancellation for final consumption / for energy carrier conversion / for input into energy storage / for transition into another certification scheme) Please specify
Does your member state provide GO cancellation statistics for energy that changes dissemination level during its chain of custody?	No	No	No	No	No		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, for transitioning into another certification mechanism or other?	Cancellations for final energy consumption, conversion for gas and heating, ex-domain cancellation	Cancellations for final energy consumption, conversion for gas and heating, ex-domain cancellation			Cancellations for final energy consumption, conversion for gas and electricity, ex-domain cancellation		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)?	No	No	No	No	No		Yes/No
Link to the detailed cancellation statistics	<a href="https://www.fingrid.fi/en/electricity-market-information/transactions-of-gos/">https://www.fingrid.fi/en/electricity-market-information/transactions-of-gos/</a>	<a href="https://energiavirasto.fi/-/uudet-energian-alkuperatakuutuotteet-ilmestyneet-markkinoille">https://energiavirasto.fi/-/uudet-energian-alkuperatakuutuotteet-ilmestyneet-markkinoille</a>	<a href="https://energiavirasto.fi/-/uudet-energian-alkuperatakuutuotteet-ilmestyneet-markkinoille">https://energiavirasto.fi/-/uudet-energian-alkuperatakuutuotteet-ilmestyneet-markkinoille</a>	<a href="https://energiavirasto.fi/-/uudet-energian-alkuperatakuutuotteet-ilmestyneet-markkinoille">https://energiavirasto.fi/-/uudet-energian-alkuperatakuutuotteet-ilmestyneet-markkinoille</a>	<a href="https://energiavirasto.fi/-/uudet-energian-alkuperatakuutuotteet-ilmestyneet-markkinoille">https://energiavirasto.fi/-/uudet-energian-alkuperatakuutuotteet-ilmestyneet-markkinoille</a>		weblink

#### Supervision on Disclosure obligation

What measures are in place for supervision of suppliers regarding their disclosure of the origin of the gas of their supply?		The supervision is conducted by the supervisory authority appointed in the national GO legislation.	The supervision is conducted by the supervisory authority appointed in the national GO legislation.	The supervision is conducted by the supervisory authority appointed in the national GO legislation.			Please describe
Is there a public report on the result of the disclosure supervision? - If yes, where can it be found?		No	No	No			Yes/No Please specify

#### Union Database (UDB) and disclosure supervision

Will a link between GO Registry and UDB be provided in your domain? - If yes: which institution/authority will provide this?		Not yet	Not yet	Not yet			Yes/No
Will the Disclosure Competent Body have access to the UDB?		Not yet	Not yet	Not yet			
What mechanism is in place for the interaction between the GO registry and the UDB? - If none yet, what ideas or plans are there regarding the future for this interaction between GOs and UDB?		Not yet	Not yet	Not yet			Please describe



Is data from the Union Database for sustainable biofuels checked to confirm the location of renewable energy consumption? - If yes, please describe the principles of this check		Not yet	Not yet	Not yet			Please describe
Is a consistency check done regarding information in the UDB and the beneficiary of cancelled GOs for the same gas? - If yes, please describe the principles of this check		Not applicable, because UDB is not in use	Not applicable, because UDB is not in use	Not applicable, because UDB is not in use			Please describe

#### Member States reporting to EC on GO statistics and renewable energy consumption

Which principles do you use to report GO statistics and renewable energy consumption in annex XVI of the implementing Act C(2022) 8251? - If yes, how do they differ?	Principles defined in the Act and reporting template in question	Principles defined in the Act and reporting template in question	Principles defined in the Act and reporting template in question	Principles defined in the Act and reporting template in question	Principles defined in the Act and reporting template in question		<a href="#">annex XVI of the implementing Act C(2022) 825</a>
Do the reported figures differ from your published GO statistics? - If yes, how do they differ?	No	No	No	No	Not applicable		Yes/No Please describe
Do the reported figures differ from the reported consumption data for the annual residual mix exercise? - If yes, how do they differ?	No	Not applicable	Not applicable	Not applicable	Not applicable		Yes/No Please describe

#### Suggestion on Improvement

Which improvement suggestions do you have regarding the residual mix calculation method? - If yes, please describe the principles of this check							Please describe
Which improvement suggestions do you have regarding this questionnaire?						Quite many undefined definitions are used in the questionnaire, which might lead to answers from different countries that are not comparable.	Please describe