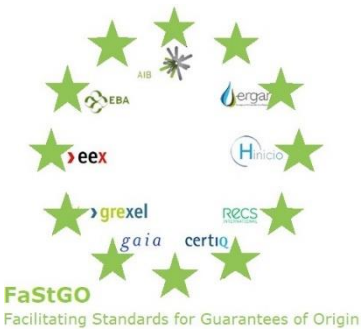
Technical support for RES policy development and implementation.
Establishing technical requirements & facilitating the standardisation process for guarantees of origin on the basis of Dir (EU) 2018/2001

Task 1
Mapping of the currently existing standardisation frameworks

Task 1.2
Comparison of EN16325 and EECS Rules with the requirements in the Directive (EU) 2018-2001 on guarantees of origin



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1. Introduction

1. Framework

The FaStGO project provides expert advice to the European Commission DG ENER, based on the terms of Reference N° ENER/C1/2019-517: "Technical support for RES policy development & implementation. Establishing technical requirements and facilitating the standardisation process for guarantees of origin on basis of Dir (EU) 2018/2001."
Task 1 of FaStGO has the aim of 'Mapping the Currently existing standardisation frameworks. This contains 3 subtasks.
Under task 1.1 the project compared the current text of EN16325 and the EECS Rules and identiies the main differences between the two documents.
Task 1.2 compares the current text of EN16325 and the EECS Rules with the provisions of the Renewable Energy Directive (EU) 2018/2001.
Task 1.3 identifies the main challenges that currently exist in the management of guarantee of origin systems.
Further in the project (FaStGO Task 2) options and text proposals are drafted for the standard EN16325 on guarantees of origin.
Those text proposals for a revised EN16325, will be an input for the process in CEN/CENELEC for the revision of this standard on guarantees of origin.

2. What and why

The Renewable Energy Directive provides major the point of orientation for EN16325 for guarantees of origin (GOs). The current version of EN16325 was oriented on the requirements on guarantees of origin of the Renewable Energy Directive (EU) 2009/28, which has been replaced by the Renewable Energy Directive (EU) 2018/2001.
EECS stands for European Energy Certificate System. The EECS Rules are available on https://www.aib-net.org/eecs/eecsr-rules .

This document compares the EN16325 and the EECS Rules with the text on guarantees of origin in the new European Renewable Energy Directive, with a view on the upcoming revision of EN16325.

Updates on the Energy Efficiency Directive (EU) 2012/27 and the replacement of the Internal Energy Market Directive are not in the scope of the below comparison.

2. Executive Summary

The body of this document comprises a comparison and analysis of the provisions of Directive 2018/2001 regarding guarantees of origin versus EN 16325:2013+A1:2015 (hereinafter: EN16325) and the EECS Rules maintained by the Association of Issuing Bodies (AIB) as per February 2020.

The detail can be studied in the body of this document. Below you will find a brief overview of the differences with the greatest impact.

GOs for energy carriers other than electricity and facilitating energy carrier conversion
Where EN16325 facilitates GOs for electricity, Directive 2018/2001/EC requires GOs to be issued also for gas, including hydrogen, and for heating and cooling. The provisions for certification and disclosure of electricity must, to the extent possible, be harmonised to apply to these other energy carriers, as well. Such provisions should then be expanded to include procedures and conditions for the issuance of GOs for conversion of one energy carrier into another. Further, insofar as they cannot be harmonised, energy carrier-specific procedures must be developed for each of the energy carriers.

Disclosure
For coherent and accurate disclosure to take place, it is essential that:

- where a GO is issued, only cancellation of that GO can prove the origin of the corresponding unit of energy; the alternative is the residual mix;
- it is clear what claims may be made regarding the origin when cancelling a GO, and by whom;
- that residual mix be calculated in accordance with a common methodology *per energy carrier* – it is recommended that practice as developed by the AIB based on RE-DISS be followed;
- that calculation of disclosure statements be done in accordance with a common methodology *per energy carrier*, and that supervision takes place on the accuracy of such disclosure statements.

Recognition of GOs issued in other Member States (MS)
The Directive requires MS to recognise GOs issued in other MS. This means MS have to make their own assessment of whether a GO is accurate, reliable, and veracious. It will be worthwhile to investigate if the provisions for audits of competent bodies can be strengthened in EN16325, in order to give assurance to MS on the accuracy, reliability and veracity of GOs.

Simplified information on GOs or small production devices
The Directive enables that the information specified on GOs issued for energy produced in production devices with a capacity below 50 kW may be simplified. The FaStGO project in this document for Task 2.2 expresses no opinion on whether simplification of the information on a GO is desirable. However, in order to secure unimpeded international transfer, it is recommended that EN16325 be amended to harmonise the way such simplification of data is achieved, and to set out the extent to which simplification is allowed.

Facilitate labels
Because the Directive mentions the assessment of options to establish a Union-wide green label, it is recommended to provide a data field on the GO that can carry information on such label.

3. Comparison between of EN16325 and EECS Rules with the requirements in (EU) 2018/2001

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
Preambles					
(55)	Guarantees of origin issued for the purposes of this Directive have the sole function of showing to a final customer that a given share or quantity of energy was produced from renewable sources. A guarantee of origin can be transferred, independently of the energy to which it relates, from one holder to another. However, with a view to ensuring that a unit of renewable energy is disclosed to a customer only once, **double counting and double**	3.24 B1.1.1	**Guarantee of Origin** **GO** certificate Issued under a National GO Scheme with the >purpose< of Disclosure **Guarantee of Origin** a certificate issued by (a) a Competent Authority; or (b) by a Member acting as the duly authorised agent on behalf of a Competent Authority, under the laws of a State as a guarantee of the nature and origin of energy for the purpose of providing proof to the final consumer of energy that a given share or quantity of energy, as the case may be: (i) was produced from the energy source to which the guarantee relates; and/or	All three documents are consistent in that they consider the purpose of a GO to be disclosure. However, it must be noted that the Directive describes this in a way that is inconsistent with its actual provisions. In preamble 55, it mentions that the purpose of a GO is to show that a given share or quantity of energy was produced from *renewable* sources. Yet art. 19, paragraph 2 provides that Member States may arrange for GOs to be issued for energy from *non-renewable* sources. Given the context within	The interpretation of the purpose of a GO provided in the analysis column (being to disclose the energy source for which it was issued) will drive further recommendations for change in the present document. **The provisions for securing uniqueness should be strengthened in EN16325 as outlined in the comparison of EN16325 and the EECS Rules (T1.1).**

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
	disclosure of guarantees of origin should be avoided. Energy from renewable sources in relation to which the accompanying guarantee of origin has been sold separately by the producer should not be disclosed or sold to the final customer as energy from renewable sources. It is important to distinguish between green certificates used for support schemes and guarantees of origin.		(ii) was produced by the specified technology type to which the guarantee relates; and/or (iii) has, or the Production Device(s) which produced it has (or have), other attributes to which the guarantee relates;	which Directive 2018/2001 was adopted (i.e. Clean Energy for All Europeans), the only logical conclusion is that a GO issued for a non-renewable source cannot be used to show that the energy to which it relates was produced from a renewable source. As such, the interpretation of preamble 55 must be that the purpose of each GO is to show to a final customer the source from which a quantity of energy was produced. Further, note that the Directive has a specific focus on prevention of double counting and double disclosure. As elaborated in the comparison of EN16325 and the EECS Rules, the	

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
				provisions of the former should be elaborated.	
(56)	It is appropriate to allow the consumer market for renewable electricity to contribute to the development of energy from renewable sources. Member States should therefore require electricity suppliers who disclose their energy mix to final customers pursuant to Union law on the internal market for electricity, or who market energy to consumers with a reference to the consumption of energy from renewable sources, to use guarantees of origin from installations	N/A N9.1.1	In order to comply with EECS Rules sections C3.3.1 and E3.3.14, at least the following requirements are fulfilled in the Domain, for the energy medium of the related Output: (a) Disclosure of the origin of electricity must be mandatory for all suppliers of electricity, but may also apply to other type of actors depending on member state legislation; (b) A competent national authority for Disclosure exists and is independent of energy companies. This body is responsible for supervision of the following elements as provided for by the corresponding provisions of the national legal framework:	Neither EN16325, nor the EECS Rules replicate the requirement of the Directive that: • disclosure of electricity from renewable sources as per Directive 2019/944/EC on the Internal Electricity Market; and • claims made by suppliers regarding the renewable origin of their supply; must be corroborated through cancellation of guarantees of origin for renewable electricity. Indeed, there is no need to replicate such: the	EN16325 should be amended to include minimum requirements for supervision of claims made regarding the origin of electricity. Annex I of the Internal Energy Market Directive 2019/944/EC only covers the obligation to disclose the origin of renewable *electricity* through cancellation of GOs. To prevent double-counting, such should also apply to disclosure of the renewable origin of: • heating and cooling: in

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
	producing energy from renewable sources.		(i) Disclosure figures as determined by legislation of the Member State, and the methodology to be used by energy companies; (ii) That the disclosure information provided to consumers with the bill or with other billing material is supervised by a competent authority; (iii) That the total quantity of disclosed volumes, according to tracking mechanisms supported by legislation, such as cancelled Guarantees of Origin, matches total supplied volumes by energy companies; (iv) (If there is a practice to use a residual mix in that Domain,) residual mix calculation and figures, as well as the usage of those figures in Disclosure by suppliers; and (v) (If there is no practice to use the residual mix in that Domain,) calculation and, figures of an alternative implicit	*Directive* makes this an obligation on Member States. However, Member States must supervise suppliers' practices to secure their compliance with this requirement. The EECS Rules provide a framework for this, whereas EN16325 does not.	accordance with the requirement of Article 24, subsection 1 of Directive 2018/2001/EC to provide information to final customers on the share of renewable energy; • gases (including hydrogen). Inspiration for how this can be done can be found in the framework of electricity disclosure complemented with the corresponding provisions in the EECS Rules.

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
			mix (e.g. production mix which excludes renewable attributes) are used by suppliers for Disclosure, which prevents attributes represented by GOs from being double counted implicitly; and (c) Where a GO system is in place for a specific energy source, there is an obligation to cancel Guarantees of Origin (or to use other tracking mechanisms supported by the legislation) when claiming the related attributes of that energy source for Disclosure.		
(57)	It is important to provide information on how supported electricity is allocated to final customers. In order to improve the quality of that information to consumers, Member States should ensure that guarantees of origin are issued for all	N/A N9.1.1	 See above at preamble (56).	As a matter of principle, the Directive leaves it to Member States' discretion to decide whether or not to issue GOs for supported energy. Where Member states *do* issue GOs for supported energy, they are required under the	EN16325 should be amended to include minimum requirements for supervision of claims made regarding the origin of electricity. Such supervision could be aided by periodic (e.g. monthly) notification by the Competent Body in

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
	units of renewable energy produced, except where they decide not to issue guarantees of origin to producers that also receive financial support. If Member States decide to issue guarantees of origin to producers that also receive financial support or not to issue guarantees of origin directly to producers, they should be able to choose by which means and mechanisms to take into account the market value of those guarantees of origin. Where renewable energy producers also receive financial support, the market value of the guarantees of origin for the same production should be			Directive to take the market value of such GOs into account. The scope of EN16325 shall be GOs; not their market value or support. However, it *is* important that supported energy which does not receive GOs is appropriately accounted for in the calculation of disclosure statements and/or residual mix. This will require supervision.	charge of support to the Competent Body in charge of disclosure of the amount of energy that has received support without the issuance of GOs.

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
	appropriately taken into account in the relevant support scheme.				
(58)	Directive 2012/27/EU provides for guarantees of origin for proving the origin of electricity produced from high-efficiency cogeneration plants. However, no use is specified for such guarantees of origin, so their use may also be enabled when disclosing the use of energy from high-efficiency cogeneration.	N/A N/A		As per article 19, subparagraph 8 of the Directive, where electricity is generated from high-efficiency cogeneration (HEC) using renewable sources, only one GO specifying both characteristics may be issued. To prevent double-issuing, such limitation should in fact also apply where Member States enable issuing GOs for non-renewable energy as per art. 19, subparagraph 2.	EN16325 should clarify: • that only one GO shall be issued for each unit of energy, regardless of the energy source used; • that claims regarding the HEC nature of electricity shall only be made in concurrence with a claim regarding the energy source used.

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
				From the analysis at preamble (55) above follows that the purpose of each GO is to show to a final customer the source from which a quantity of energy was produced. Further, a GO can only be cancelled once. This means that any claim regarding the HEC nature of electricity shall be made together with any claim regarding the energy source used; i.e. they cannot be separated.	
(59)	Guarantees of origin which are currently in place for renewable electricity should be extended to cover renewable gas. Extending the guarantees of origin system to energy from non-renewable sources should be an option for	N/A O	 Section text omitted – too long for full inclusion.	The Standard does not yet incorporate provisions for certification of energy carriers other than electricity.	It is recommended that the structure of the Standard be amended to include a generic set of rules for all energy carriers, and separate sets of rules specific to each different energy carrier identified by the Directive (electricity,

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	Member States. This would provide a consistent means of proving to final customers the origin of renewable gas such as biomethane and would facilitate greater cross-border trade in such gas. It would also enable the creation of guarantees of origin for other renewable gas such as hydrogen.				heating & cooling, and gas incl. hydrogen).
Article 2 Definitions					
2 (12)	'guarantee of origin' means an electronic document which has the sole function of providing evidence to a final customer that a given share or quantity of energy was produced from renewable sources;	3.24 B1.1.1	**Guarantee of Origin** **GO** certificate Issued under a National GO Scheme with the >purpose< of Disclosure **Guarantee of Origin** a certificate issued by (a) a Competent Authority; or (b) by a Member acting as the duly authorised agent on behalf of a Competent Authority, under the laws of a State as a guarantee of the nature and origin of energy for	The documents are fairly consistent, but have varying levels of detail: a. The Directive is the most explicit about a GO being an electronic document, albeit without defining exactly what an 'electronic document' actually is.	Recommendation to amend in EN16325: 1 the definition for GO to reflect that: A. a GO is an electronic document; B. the purpose of a GO is Disclosure (capitalised to refer to the definition for

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
			the purpose of providing proof to the final consumer of energy that a given share or quantity of energy, as the case may be: (i) was produced from the energy source to which the guarantee relates; and/or (ii) was produced by the specified technology type to which the guarantee relates; and/or (iii) has, or the Production Device(s) which produced it has (or have), other attributes to which the guarantee relates;	b. The Directive specifically mentions renewable energy (see also the analysis at preamble (55) above). c. EN16325 and the EECS Rules make an explicit link to national legislation. d. The EECS Rules describe what sort of claims could be made in connection with the use of a GO. Ad a. Although EN16325 and the EECS Rules both agree that GOs shall be issued electronically, it is indeed clearer to include this in the definition. Ad b. As is explained above, the purpose of a GO is to	Disclosure) of the source of the energy; C. it is issued under a National GO Scheme. 2 amend the definition of Disclosure to include the types of claims that can be made through cancellation of a GO. With regard to 1A above, recommendation to clarify that a GO being an 'electronic document' enables: • identification of the holder of the GO; • secure exchange of information about the source of the associated energy

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
				disclose the energy source. Ad c. The link with national legislation is useful, as it makes it clear that certificates not issued under legislation are not GOs. Ad d. For the sake of clarity, mentioning the types of claims that could be made is useful. Such claims should be with regard to information directly included on a GO. For example, if a GO mentions that the relevant EGI / production device was commissioned on 1 February 2020, a supplier cancelling that GO can claim such. However, he cannot	with other persons and institutions; and • electronic signing of data sent in such a way as to enable verification of its integrity and origin, which secures uniqueness and prevents double-counting. Moreover, EN16325 should incorporate the following: A GO solely exists while recorded in a Registration Database of a Competent Body or in secure transit between such Registration Databases by means of an electronic protocol for secure exchange of information.

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
				claim to the final customer for whom he performed the cancellation that their consumption contributed to an increase of renewable production capacity. However, such distinction should be made in the definition for *Disclosure* (as opposed to it being in the definition for a GO).	Ownership of a GO is determined solely in a Registration Database. During transfer, ownership is vested in the sending party until such time the receiving party acknowledges receipt, or the operator of the receiving Registration Database acknowledges reception on behalf of the Account Holder of the receiving Account. The connection between the Competent Bodies must guarantee that the transferred GOs remain unique.
2 (13)	'residual energy mix' means the total annual energy mix for a Member State, excluding the share	N/A N/A		Neither document defines Residual Mix. For the purpose of Disclosure and supervision thereof, the	Recommendation to include in EN16325 a definition for Residual Mix, and to clarify that it shall be calculated

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
	covered by cancelled guarantees of origin;			inclusion of a definition is essential. A GO can only be cancelled to provide proof of the energy carrier to which it relates. (E.g. a GO for renewable electricity can be cancelled in connection with the supply of electricity, but not heating, cooling or gas.) Similarly, Residual Mix should be calculated per energy carrier.	separately for each energy carrier.
Article 19 Guarantees of origin for energy from renewable sources					
19.1	For the purposes of demonstrating to final customers the share or quantity of energy from renewable sources in an energy supplier's energy mix and in the energy supplied to consumers under contracts marketed with reference to the consumption of energy from renewable		All of EN16325 All of the EECS Rules	EN16325 and the EECS Rules form an extension of the Directive: they provide a framework within which Member States design such objective, transparent and non-discriminatory criteria. This subsection 19.1 specifically mentions:	In order to avoid the attributes of the same MWh from being claimed for consumption more than once, it is essential that EN16325 establishes consistency through either of the following principles: • A prohibition be introduced for parties other than

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
	sources, Member States shall ensure that the origin of energy from renewable sources can be guaranteed as such within the meaning of this Directive, in accordance with objective, transparent and non-discriminatory criteria.			• demonstrating the composition of the energy mix provided by a supplier; and • energy supplied under contracts. It is not entirely clear if that second bullet point is an explicit reference to the first, i.e. if such energy is supplied under a contract *with a supplier*. In any case, as described in the analysis for the definition for Disclosure in the comparison of EN16325 and the EECS Rules[1], in practice, claims of renewable energy consumption are also made by other parties than suppliers.	suppliers to make a claim regarding the origin of energy used. (which seems to be narrower than art.19.1 of REDII) Or • GOs are cancelled also for consumption claims by other parties than suppliers, and that the purpose of a GO be amended, accordingly.

[1] See T1.1, EN16325 section 3.14.

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
19.2	To that end, Member States shall ensure that a guarantee of origin is issued in response to a request from a producer of energy from renewable sources, unless Member States decide, for the purposes of accounting for the market value of the guarantee of origin, not to issue such a guarantee of origin to a producer that receives financial support from a support scheme. Member States may arrange for guarantees of origin to be issued for energy from non-renewable sources.	3.22	**GO Issuing Request** request by the authorised representative of an EGI to a Competent Body for the Issue of GOs in respect of that EGI and a specific period of time	Both EN16325 and the EECS Rules provide a practical implementation of the request foreseen in the Directive. Regarding the option for MS to not issue GOs for supported energy, see the analysis at preamble (57).	In respect of the issuing request, none. As per the impact explained at preamble (57), EN16325 should be amended to include minimum requirements for supervision of claims made regarding the origin of electricity.
		B1.1.1	**Production declaration** a request by the operator of a Production Device to an Authorised Issuing Body for the Issue of EECS Certificates, in respect of a particular Production Device and a specific period of time;		
		3.22	**GO Issuing Request** request by the authorised representative of an EGI to a Competent Body for the Issue of GOs in respect of that EGI and a specific period of time	Neither EN16325, nor the EECS Rules require that energy be produced from renewable sources to be eligible to receive a GO. However, at this time EN16325 is limited to the certification of electricity, whereas	It is recommended that the structure of the Standard be amended to include a generic set of rules for all energy carriers, and separate sets of rules specific to each different energy carrier identified by the Directive (electricity,
		B1.1.1	**Production declaration** a request by the operator of a Production Device to an		

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
			Authorised Issuing Body for the Issue of EECS Certificates, in respect of a particular Production Device and a specific period of time;	EECS effectively enables certification of gas, too.	heating & cooling, gas, incl. hydrogen).
	Issuance of guarantees of origin may be made subject to a minimum capacity limit.	N/A		Neither EN16325, nor the EECS Rules replicate the option to include a minimum capacity limit as foreseen in the Directive. They do not need to – national legislation shall reflect whether the MS in question has enacted a such a limit.	None, although we will note that technically it is possible for a MS to introduce a threshold so high as to not issue GOs *at all*.
		N/A			
	A guarantee of origin shall be of the standard size of 1 MWh.	7.1	Each GO shall have a value of 1 MWh.	Both documents reflect the face value of a GO as identified in the Directive.	None.
		N4.1.1	The Face Value of EECS Certificates [for electricity] corresponding to EECS Products shall be 1 MWh.		
		O4.1.1	The Face Value of EECS Certificates [for gas] corresponding to EECS Products shall be 1 MWh.		

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	No more than one guarantee of origin shall be issued in respect of each unit of energy produced.	4	a)Uniqueness: 1)No more than one Certificate with a purpose of Disclosure shall be Issued and subsequently Cancelled in respect of the same unit of Output.	The documents are consistent in regard of the issuance of one GO per MWh.	None.
		A2.1.1	The arrangements for Issuing, transferring and Cancelling EECS Certificates should be such as to eliminate the possibility of more than one EECS Certificate bearing the same Purpose being Issued, registered or Cancelled in respect of the same unit of Output, unless that Purpose is Public Support.		
	Member States shall ensure that the same unit of energy from renewable sources is taken into account only once.	4	a) Uniqueness: 1)No more than one Certificate with a purpose of Disclosure shall be Issued and subsequently Cancelled in respect of the same unit of Output.	The EECS Rules have far more elaborately defined what 'taken into account only once' means.	The credibility of the GO system is dependent on the unique proof each GO represents. It is important to note that such credibility does not end with the issue

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
		A2.1.1	The arrangements for Issuing, transferring and Cancelling EECS Certificates should be such as to eliminate the possibility of more than one EECS Certificate bearing the same Purpose being Issued, registered or Cancelled in respect of the same unit of Output, unless that Purpose is Public Support.		and cancellation of a GO. It should be clearly defined that where a GO is issued for an amount of energy, the origin of that energy can only be proved: • by cancellation of that GO; or • by expiry of that GO (in which case it is included in the residual mix). This is an important addition AIB has made compared to the corresponding objective in EN16325, and EN16325 should be amended accordingly.
		A2.1.2	The arrangements for Issuing EECS Certificates should be such as to eliminate the possibility of EECS Certificates being Issued in respect of the same unit of Output and attributes for which other transferrable Certificates (other than EECS Certificates of a different type where specifically permitted by the EECS Rules) have been or will be issued for the same Purpose. The arrangements for Cancelling EECS Certificates should ensure that EECS Certificates in respect of the relevant Output are used		

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
			as the sole proof of the qualities of the associated Output according to the relevant Product Rules and that no form of Disclosure is used in relation to Output to which such an EECS Certificate relates other than in connection with the cancellation of that EECS Certificate.		
		A2.1.3	Where several EECS Certificates, each of which has a different Purpose, are issued for the same Output, then each such EECS Certificate shall uniquely identify each of the other such EECS Certificates.		
		A2.1.4	The Purpose of an EECS Certificate shall not conflict with the Purpose of any other Certificate issued for the same unit of Output.		
		A2.1.5	Scheme Members shall clearly communicate the Purpose of an EECS Certificate to the Account		

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
		A2.1.6	Holders using their registries in order that they may better inform consumers. An EECS Certificate may only be used in accordance with its Purpose.		
	Member States shall ensure that when a producer receives financial support from a support scheme, the market value of the guarantee of origin for the same production is taken into account appropriately in the	N/A		The Directive leaves it to Member States' discretion to decide whether or not to issue GOs for supported energy. It is important that where they do not, supported energy is appropriately accounted for in the calculation of disclosure statements	EN16325 should be amended to include minimum requirements for supervision of claims made regarding the origin of electricity.

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
	relevant support scheme. It shall be presumed that the market value of the guarantee of origin has been taken into account appropriately in any of the following cases: (a) where the financial support is granted by way of a tendering procedure or a tradable green certificate system; (b) where the market value of the guarantees of origin is administratively taken into account in the level of financial support; or (c) where the guarantees of origin are not issued directly to the	N/A		and/or residual mix. This will require supervision. The way the market value of GOs is taken into account for the purposes of a GO scheme is in principle outside the scope of the Standard.	

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	producer but to a supplier or consumer who buys the energy from renewable sources either in a competitive setting or in a long-term renewables power purchase agreement. In order to take into account the market value of the guarantee of origin, Member States may, inter alia, decide to issue a guarantee of origin to the producer and immediately cancel it.				
	The guarantee of origin shall have no function in terms of a Member State's compliance with	N/A		This is a matter of scope. It is sufficient for the Directive to mention that GOs shall not be	

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
	Article 3. Transfers of guarantees of origin, separately or together with the physical transfer of energy, shall have no effect on the decision of Member States to use statistical transfers, joint projects or joint support schemes for compliance with Article 3 or on the calculation of the gross final consumption of energy from renewable sources in accordance with Article 7.	N/A		used for target counting, and for EN16325 and the EECS Rules to omit target counting from their defined scope.	
19.3	For the purposes of paragraph 1, guarantees of origin shall be valid for 12 months after the production of the relevant energy unit. Member States shall ensure that all	10.1	A GO shall cease to be valid when: a)it is Cancelled in accordance with a valid Cancellation request made under 10.2.1; b)it is withdrawn in accordance with 10.3; or c)its validity Expires in accordance with 10.4 and in the manner	Both EN16325 and the EECS Rules contain provisions for expiry. The EECs Rules omit timing of expiry, because it also enables issuance of certificates other than GOs.	In principle, the provisions for expiry in EN16325 are sufficient for implementing the Directive. After all, it provides a more stringent expiry rule than the Directive does.

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
	guarantees of origin that have not been cancelled expire at the latest 18 months after the production of the energy unit. Member States shall include expired guarantees of origin in the calculation of their residual energy mix.		and time set out in the relevant National GO Scheme.	The Directive is not entirely clear regarding expiry: a. Apparently, the Commission sees a difference between the end of the validity of a GO and the expiry of a GO. In contrast, EN16325 and the EECS Rules agree that expiry is one of the possible causes for a GO to become invalid. This gives rise to questions: i. As per art. 19, subparagraph 4 of the Directive (see below) a GO can be cancelled within 6 months after losing its validity. If not to mark the end of	Defining more lenient provisions in the Standard is not advisable, because: • It is unclear what benefits there might be for having an extra period between the end of validity and the moment of expiry of GO. • It *is* clear that having such a period has severe implications for the lead time for calculation of the residual mix, as well as for the timing of the publication of disclosure statements. Information loses
		10.4	The Competent Body shall Expire the GO no more than 12 months after the end of the period during which the associated Electricity was produced. The status of a GO which has Expired according to the above process shall be recorded as >Cancelled because of Expiry< as Expired in the Registration Database in which it is held at such time.		
		C6.1.1	An EECS Certificate shall cease to be valid when: (a) it is Cancelled in accordance with a valid Cancellation request made under Section C8; (b) it is withdrawn, as the case may be: (i) in accordance with Section C8.2;		

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			(ii) in accordance with Section C8.4.2 with the purpose of rectifying errors; or (c) its validity Expires in the manner and time set out in the Product Rules for the relevant EECS Product. The status of an EECS Certificate which has Expired as set out in Section C6.1.1 above shall be recorded as Expired in the EECS Registration Database in which it is held at such time.	life, what then does the end of the validity of a GO mean? ii. And how does such tie into the process of disclosure? b. The Directive stipulates that expired GOs be included in the calculation of residual mix, but does not define how.	its value over time, and as lead time increases, the value of the information for consumers diminishes. Inconsistent calculation of residual mix between Member States implies a risk of double counting. This contradicts art. 19, subparagraph 2 of the Directive, which says that the same unit of energy shall be taken into account only once. To secure consistent calculation, it is therefore recommended to include in EN16325 provisions for calculation of residual mix in the form of an Annex. As follows from the analysis of the

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					definition of residual mix as per article 2 of the Directive, residual mix should be calculated separately for each energy carrier. The AIB has already drafted an extensive methodology for electricity. For illustrative purposes only, a *simplified* representation of this methodology[2] is: $$Residual\ Mix = Energy\ Generation - GO\ issuance + GO\ expiry$$ The recommendation, however, is for the full

[2] For a country with nett GO import. Each of the terms in the formula refers to the attributes and quantities of the energy for the relevant disclosure period.

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					methodology to be included.
19.4	For the purposes of disclosure referred to in paragraphs 8 and 13, Member States shall ensure that energy companies cancel guarantees of origin at the latest six months after the end of the validity of the guarantee of origin.	See the analysis and impact of 19.3			
19.5	Member States or designated competent bodies shall supervise the issuance, transfer and cancellation of guarantees of origin. The designated competent bodies shall not have overlapping geographical	3.11	**Competent Body** body duly authorised under the laws and regulations of any state (and, as the case may be, region) to exercise or discharge any legislative, governmental, regulatory or administrative function associated with the administration of a National GO Scheme	The term 'supervise' for the purpose of the Directive is understood to relate to the practical implementation of the GO scheme. EN16325 and the EECS Rules use the term Competent Body / Authority to refer	None – in principle, the documents are extensions of each other here. However, we note that the well-functioning of the GO scheme does not end with the cancellation of a GO – proper disclosure and

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	responsibilities, and shall be independent of production, trade and supply activities.	B1.1.1	**Competent Authority** in relation to the exercise or discharge of any legislative, governmental, regulatory or administrative function with respect to any Domain, the body duly authorised under the laws and regulations of the state (and, as the case may be, region) in which such Domain is situated to exercise or discharge that function, and, in relation to any Guarantee of Origin or Support Certificate the body duly authorised by the State under the relevant Legislative Certification Scheme to issue that Guarantee of Origin and/or Support Certificate as the case may be;	to the organisation charged with such duty.	supervision of such is equally important.
19.6	Member States or the designated competent bodies shall put in place appropriate		All of EN16325	Both EN16325 and the EECS Rules aim for accuracy, reliability, and fraud-resistance.	None.

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	mechanisms to ensure that guarantees of origin are issued, transferred and cancelled electronically and are accurate, reliable and fraud-resistant. Member States and designated competent bodies shall ensure that the requirements they impose comply with the standard CEN - EN 16325.		All of the EECS Rules		
19.7	A guarantee of origin shall specify at least: (a) the energy source from which the energy was produced and the start and end dates of production;	7.1	A GO shall contain at least the following information: f) the first day on which the Output to which the GO relates was produced; g) the last day on which the Output to which the GO relates was produced; h) the Type of Installation (see normative Annex A);	The provisions of EN16325 and the EECS Rules are very similar and are for the most part consistent with the requirements of the Directive. There are two significant differences:	Major: EN16325 must be amended to facilitate gas (incl. hydrogen), heating and cooling. The provisions for certification and disclosure of electricity must, to the extent

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		C3.5.4	Each EECS Certificate shall contain the following information: (d) the first day on which the Output to which it relates was produced; (e) the last day on which the Output to which it relates was produced; (f) the energy source from which the Output was produced (by reference to the types of energy sources set out in the EECS Rules Fact Sheet" *Types of Energy Inputs and Technologies*";	The first is the energy carriers for which the Directive requires GOs to be issued: • EN16325 only covers electricity. • The EECS Rules do not specifically mention gas, but do include fuels, regardless of their physical state. The second is the Directive providing the option of including simplified information in a GO for EGIs / production devices < 50 kW. For GOs to be transferred between two Member States, both MS must apply the same data format. This means that the way information	possible, be harmonised to apply to these other energy carriers, as well. Such provisions should then be expanded to include procedures and conditions for the issuance of GOs for conversion of one energy carrier into another. Further, insofar as they cannot be harmonised, energy carrier-specific procedures must be developed for each of the energy carriers. Medium: simplification of information is optional under the Directive. As long information is not simplified, compliance with the Directive is a given. Where the
	(b) whether it relates to: (i) electricity; (ii) gas, including hydrogen; or (iii) heating or cooling;	7.1	a) the medium by which energy is conveyed, namely Electrical Energy;		
		C3.5.4	(a) the EECS Product under which it has been Issued, so identifying the carrier by which energy is conveyed, where this may be: (i) electricity; or (ii) fuel, whether gaseous, liquid or solid; or		

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			(iii) heat (including cooling), whether this is conveyed by gas, or by liquid, or by heat transfer by conduction or radation;	is simplified must be harmonised. A final, yet minor, difference is that EN16325 requires a name to be included for all EGIs / production devices. Not all devices are named, and requiring a name puts an unnecessary burden on competent / issuing bodies to obtain one. It may be considered that a unique ID number, together with its location sufficiently identify a device.	intention of MS is to use simplified information, then the implementation of such must be harmonised across MS to secure mutual recognition of GOs as per art. 19, subparagraph 9 of the Directive and to facilitate transfer, accordingly. Hence, it is advised that EN16325 be amended to incorporate: • the data fields that may be simplified; • the method for doing so; and • the extent to which such simplification shall be allowed. Minor: recommendation for
	(c) the identity, location, type and capacity of the installation where the energy was produced;	7.1	c) >the electrical capacity of the EGI in MWe<; h) the Type of Installation (see normative Annex B); i) the identity of the Originating EGI, where this shall include the unique number which has been assigned to that EGI by the Competent Body; and the name of the EGI. If the Registrant is a private person, then he or she shall agree to the name of the EGI being recorded on GO which are Issued for this EGI; j) the country in which the relevant EGI is situated; k) the location of that EGI, being its latitude and longitude; and/or country, city and postal code (please see Normative Annex D for more information);		

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		C3.5.4	(g) the type of the Originating Production Device, by reference to the types of installation set out in the EECS Rules Fact Sheet" *Types of Energy Inputs and Technologies*"; (h) the identity of the Originating Production Device, where this shall include: (i) the unique number which has been assigned to the Production Device according to Section C2.1.2(b); and (ii) optionally, the name of the Production Device as speficied in the application for registration of that Production Device, provided that the Registrant of the Production Device has agreed to this information being recorded on EECS Certificates which are issued for this Production Device; (...) (j) the location of the Originating Production Device, being its:		EN16325 to make inclusion of the name of an EGI / production device in a GO *optional*.

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			(i) latitude and longitude in accordance with the EECS Rules Fact Sheet *"Geographical Coordinates"*; and/or (ii) country, city and postal code; (k) the Capacity of the Originating Production Device, as specified by the Section of PARTIV of the EECS Rules establishing the EECS Scheme in relation to the relevant Output;		
	(d) whether the installation has benefited from investment support and whether the unit of energy has benefited in any other way from a national support scheme, and the type of support scheme;	7.1	o) an indication whether and to what extent the Originating EGI has received Public Support relating to investment in it and/or with respect to Output produced by it.		
		C3.5.4	(q) an indication, as appropriate, as to whether: (i) the relevant EECS Registration Database records that no Public Support has been, is being or will be given in respect of the Originating Production Device;		

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			(ii) the relevant EECS Registration Database records that Public Support has been given in relation to an investment in the Originating Production Device or its owner; (iii) the relevant EECS Registration Database records that Public Support is being or will be given with respect to the Output of that Originating Production Device; (iv) the relevant EECS Registration Database records that both: 1 Public Support has been given to an investor in the Originating Production Device in relation to its investment therein or in the body which owns that Production Device; and 2 Public Support is being, or will be, given in respect of the Output of that Originating Production Device; or (v) the relevant EECS Registration Database does not record whether or not Public		

2018 / 2001 section	Text	EN 16325 section EECS Rules section	EN16325 text EECS Rules text	Analysis	Impact
			Support has been, or is being, given in respect of the Originating Production Device;		
	(e) the date on which the installation became operational; and	7.1	d) the date when the EGI first became operational;		
		C3.5.4	(c) the date on which the Originating Production Device became operational (as determined in accordance with relevant national legislation), as verified by the Production Auditor during the registration process for that Production Device;		
	(f) the date and country of issue and a unique identification number.	7.1	b) the unique number assigned to the GO by the Competent Body that Issued it, see normative Annex C; (...) l) the identity >(and country or region)< of the Originating Competent Body; m) the date when the electronic Issuance of the GO took place;		
		C3.5.4	(b) the unique number assigned to it by the Originating Member in accordance with the		

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	Simplified information may be specified on guarantees of origin from installations of less than 50 kW.		Subsidiary Document *"HubCom"*; (...) (i) the Country of Issue; (...) (n) the Date of Issue;		
		N/A			
		N/A			
19.8	Where an electricity supplier is required to demonstrate the share or quantity of energy from renewable sources in its energy mix for the purposes of point (a) of Article 3(9) of	N/A		Regarding the calculation and use of residual mix, see the analysis of Art. 2, definition (13), and of Art. 19, subparagraph 3. Regarding MS not issuing GOs for	Proper disclosure of energy consists of two parts: • an obligation on suppliers to use a defined methodology for calculating

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	Directive 2009/72/EC, it shall do so by using guarantees of origin except: (a) as regards the share of its energy mix corresponding to non-tracked commercial offers, if any, for which the supplier may use the residual mix; or (b) where a Member State decides not to issue guarantees of origin to a producer that receives financial support from a support scheme.	N/A		supported energy, see the analysis of preamble (57).	disclosure statements (including residual mix) that prevents double-counting; • independent supervision of accurate application of such methodology. It is therefore recommended to include in EN16325 provisions for calculation of: • residual mix; • a supplier's energy mix; in the form of an Annex. These should be calculated separately for each energy carrier. Further, EN16325 should be amended to

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					include minimum requirements for supervision of claims made regarding the origin of energy.
	Where Member States have arranged to have guarantees of origin for other types of energy, suppliers shall use for disclosure the same type of guarantees of origin as the energy supplied.	N/A		The EECS Rules contain a provision that prevents GOs issued for one energy carrier to be used for disclosure of another energy carrier. This is consistent with the recommendations above regarding calculation of residual mix and disclosure statements. However, the Commission may have signalled another intention, here. After all, it implies MS' discretion "to have GOs for other types of energy". The	Recommendation to include in EN16325 a statement similar to that in E6.2.1 of the EECS Rules that secures that: the Account Holder shall cancel a GO only to provide proof of the supply of such energy carrier as to which that GO relates, and in so doing shall only make such claims regarding the energy source and production method of such energy as are evidenced by the information on the GO.
		E6.2.1	Each Domain Protocol shall: (...) (i) secure that each Account Holder in the relevant Domain shall not cancel an EECS Certificate for Disclosure of any other Energy Medium than that to which that EECS Certificate relates.		

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				only such discretion the Directive provides is GOs for non-renewable energy. From that it follows that GOs for non-renewable energy shall not be used for disclosure of renewable energy and vice versa.	
	Likewise, guarantees of origin created pursuant to Article 14(10) of Directive 2012/27/EU may be used to substantiate any requirement to demonstrate the quantity of electricity produced from high-efficiency cogeneration. For the purposes of paragraph 2 of this Article, where electricity is generated from high-efficiency cogeneration using renewable sources,	N/A		The substantiation of claims regarding high-energy efficiency cogeneration is not included in EN16325 or the EECS Rules. However, such can be covered by the inclusion of the statement regarding disclosure on the previous page. The restriction to issuance of only GO for each MWh is reflected in the EECS Rules, but not in EN16325.	If two GOs could be issued for the same MWh (one being for the energy source and one for high-efficiency cogeneration) this presents a huge risk for double-counting. The Standard should be amended to reflect the Directive and the EECS Rules, in that no more than one GO shall be issued for each MWh. A clear indicator on whether or not the HEC
		N8.2.2	Where a Production Device produces electrical energy from a specific source of energy using High Efficiency Cogeneration, then the relevant Scheme Member may issue no more than one EECS Certificate for each relevant MWh. This EECS Certificate may convey either: an EECS GO for a specific source of energy; or an EECS GO for High-Efficiency Cogeneration; or both an EECS GO for a specific		

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	only one guarantee of origin specifying both characteristics may be issued.		source of energy and an EECS GO for High-Efficiency Cogeneration.		criterion is met should be added on the GO under EN16325. Since 19.2 of Directive 2018/2001/EC allows Member States to issue GOs for energy from non-renewable sources, the most sensible solution is that information relating to the High-Efficiency aspect of the Cogeneration shall be included as an add-on to a GO relating to the energy source on request of the Registrant. Where such information is indeed included, the GO shall also constitute a GO for high-efficiency cogeneration electricity in accordance with the Energy Efficiency Directive.

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19.9	Member States shall recognise guarantees of origin issued by other Member States in accordance with this Directive exclusively as evidence of the elements referred to in paragraph 1 and points (a) to (f) of the first subparagraph of paragraph 7. A Member State may refuse to recognise a guarantee of origin only where it has well-founded doubts about its accuracy, reliability or veracity. The Member State shall notify the Commission of such a refusal and its justification.	N/A N/A		Neither EN16325, nor the EECS Rules contain a replication of the obligation to recognise GOs issued by other MS. In principle, they do not need to – it shall be sufficient for the Directive to cover this. However, the possibility to refuse a GO means that MS have to make their own assessment of whether a GO is accurate, reliable, and veracious. Making such an assessment is not easy. The accuracy, reliability and veracity of a GO is not only dependent on the procedures in a MS for issuing and cancelling a GO, but also on how a GO is used for disclosure. MS should be able to rely on a GO	It is recommended to include in EN16325 provisions for calculation of: • residual mix; • a supplier's energy mix; in the form of an Annex. These should be calculated separately for each energy carrier. Further, EN16325 should be amended to include minimum requirements for supervision of claims made regarding the origin of energy. And finally, it will be worthwhile to investigate if the provisions for audits of competent bodies can be strengthened in section 12.1 of

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				uniquely representing proof of the energy to which it relates. For that to be true, they must be sure that such energy is not disclosed otherwise. Assurance of such could be given by: • supervision on proper (calculation of) disclosure statements; • regularly scheduled audits of competent / issuing bodies and the GO schemes they operate. Finally, it must be noted that the requirement to recognise GOs is comprehensive: under article 19, subparagraph 9, GOs for non-renewable energy shall be recognised, *even if* a	EN16325 to provide assurance to a broader audience, including (other) competent bodies for disclosure throughout the Union. Such provisions could include a periodic report from an independent auditor. This should alleviate any concerns a Member State might have about accuracy, reliability and veracity as per article 19, subsection 9 of RED II.

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				MS itself has not arranged for such GOs to be issued. This makes it all the more important that rules for calculation of residual mix and disclosure be harmonised.	
19.10	If the Commission finds that a refusal to recognise a guarantee of origin is unfounded, the Commission may adopt a decision requiring the Member State in question to recognise it.	N/A N/A		The Directive puts a requirement on *MS* to be compliant with EN16325. Such requirement cannot apply to the Commission itself.	None.
19.11	Member States shall not recognise guarantees of origins issued by a third country except where the Union has concluded an agreement with that third country on mutual recognition of	N/A N/A		Since third countries are in principle not bound to the Directive, such measures as identified in this document for helping MS assess the accuracy, reliability and veracity of a GO do not apply.	None, yet.

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	guarantees of origin issued in the Union and compatible guarantees of origin systems established in that third country, and only where there is direct import or export of energy.			However, without knowing the contents of a potential agreement between the Union and the third country, we cannot provide an analysis, or a recommendation.	
19.12	A Member State may, in accordance with Union law, introduce objective, transparent and non-discriminatory criteria for the use of guarantees of origin in accordance with the obligations laid down in Article 3(9) of Directive 2009/72/EC.	N/A N/A		The reference to Directive 2009/72/EC is outdated – now Directive 2019/944/EC describes the obligation to use GOs for disclosure of renewable electricity. Since the latter *demands* that GOs be used for that, MS should indeed introduce such criteria.	See the recommendations above at 19.8 and 19.9.
19.13	The Commission shall adopt a report assessing options to establish a Union-wide green label with a view to promoting the use of renewable energy	N/A B1.1.1	**Independent Criteria Scheme (or ICS)** A scheme that provides assurance that the Output certified by an EECS Certificate,	Until such time as the report mentioned here is adopted, it is impossible to provide a complete analysis.	In preparation of the adoption of the report mentioned in 19.13, recommendation to add in 7.1 of EN16325 an optional field on a GO for the inclusion of

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	coming from new installations. Suppliers shall use the information contained in guarantees of origin to demonstrate compliance with the requirements of such a label.		and/or the relevant Production Device with which it is associated, conforms to a specific set of qualities which are additional to those established for the EECS Product.	However, it must be noted that the EECS Rules do contain provisions for the inclusion of labels / independent criteria schemes on certificates.	information regarding labels similar to the data field for Independent Criteria Schemes in the EECS Rules.
		C3.5.4	Each EECS Certificate shall contain the following information: (...) (s) where the Certificate has been issued in respect of a Production Device which is accredited to an ICS and the Scheme member is supporting that ICS, the relevant ICS identifier.		
		C3.6.1	The following shall apply regarding the information held on EECS Certificates Issued as the result of EECS Certificate Conversion: (...) (l) the ICS identifier identified in accordance with Section C3.5.4(s) on the Cancelled EECS Certificate may only be recorded on the new EECS Certificate if the corresponding ICS provider or providers supports this in relation to both the Energy Carrier Conversion and the EECS Certficate Conversion.		

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		D3.1.2	The Authorisation Criteria for a Member in respect of an EECS Product are that: (...) (c) where the EECS Product is an ICS Certificate, the Member either: (i) has been appointed by the Scheme Operator of the relevant ICS Scheme to Issue Certificates under that ICS Scheme in respect of Production Devices in the relevant Domain(s); or (ii) meets such other Authorisation Criteria as are specified in relation to that EECS Product in the Section of PART IV which establishes the EECS Scheme for the relevant Output;		
		D4.1.2	The PD Registration Criteria are as follows: (...) (b) applicants for registration of a Production Device for the purposes of the Product are obliged to provide the following information to the Authorised Issuing Body: (...) (xvi) where the Production Device is accredited to an ICS, the identity of that ICS;		
		E4.2.8	Where an Authorised Issuing Body is supporting an ICS which is associated with an EECS Product and the relevant Production Device and/or Output qualifies		

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			for that ICS, then the relevant ICS identifier must be associated with the EECS Certificate on its Issue.		