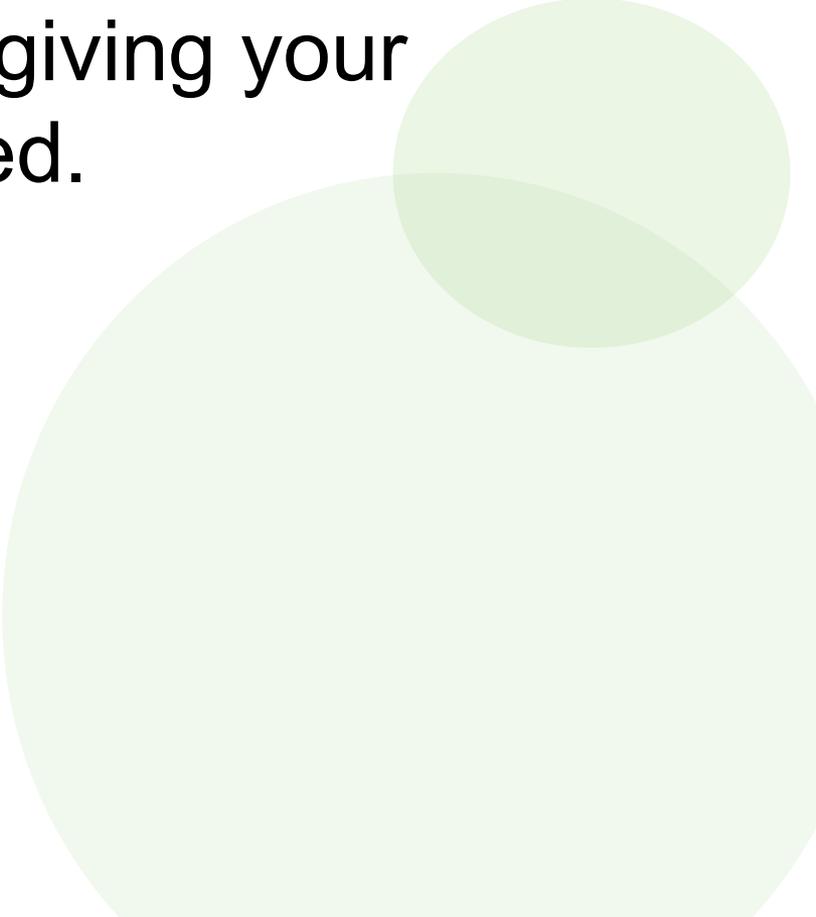

GGCS Oversight Panel Meeting
November 2025
(meeting starts at 2pm UK time)

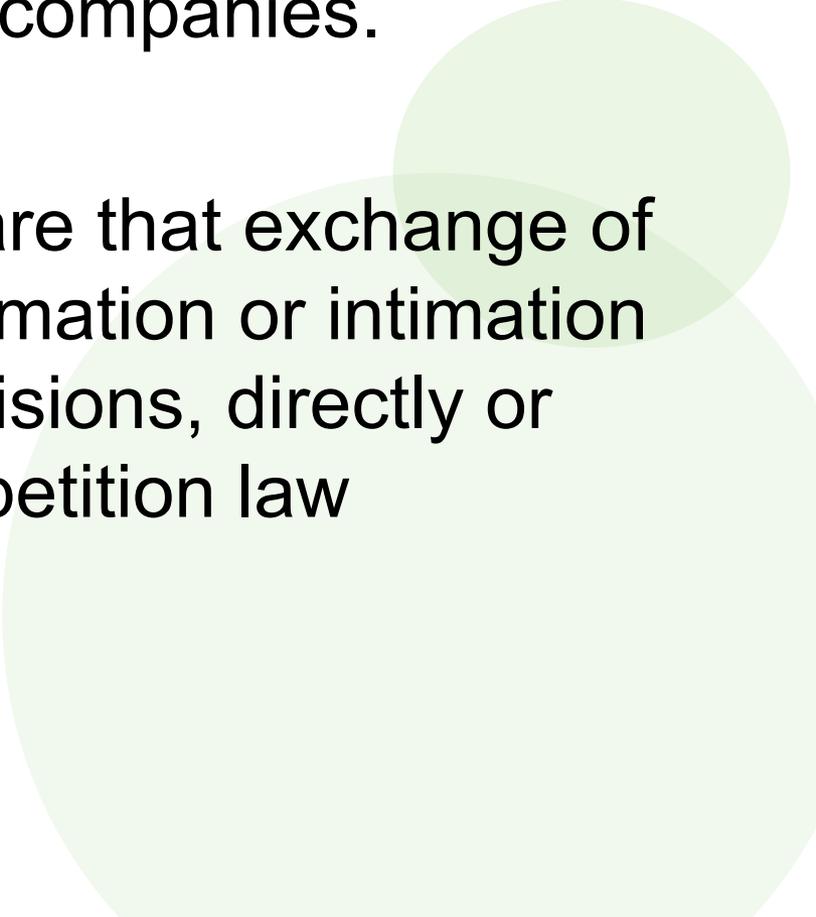
The slide features a solid green horizontal bar at the top. On the right side, there are three overlapping, semi-transparent light green circles of varying sizes, creating a decorative graphic element.

Meeting recorded

- This meeting is being recorded.
 - By participating you are giving your permission to be recorded.
- 

Competition Law Compliance

DOs and DON'Ts

- Commercial decisions must be taken independently by individual companies.
 - All participants must be aware that exchange of commercially sensitive information or intimation of intended commercial decisions, directly or indirectly, can result in competition law infringement.
- 

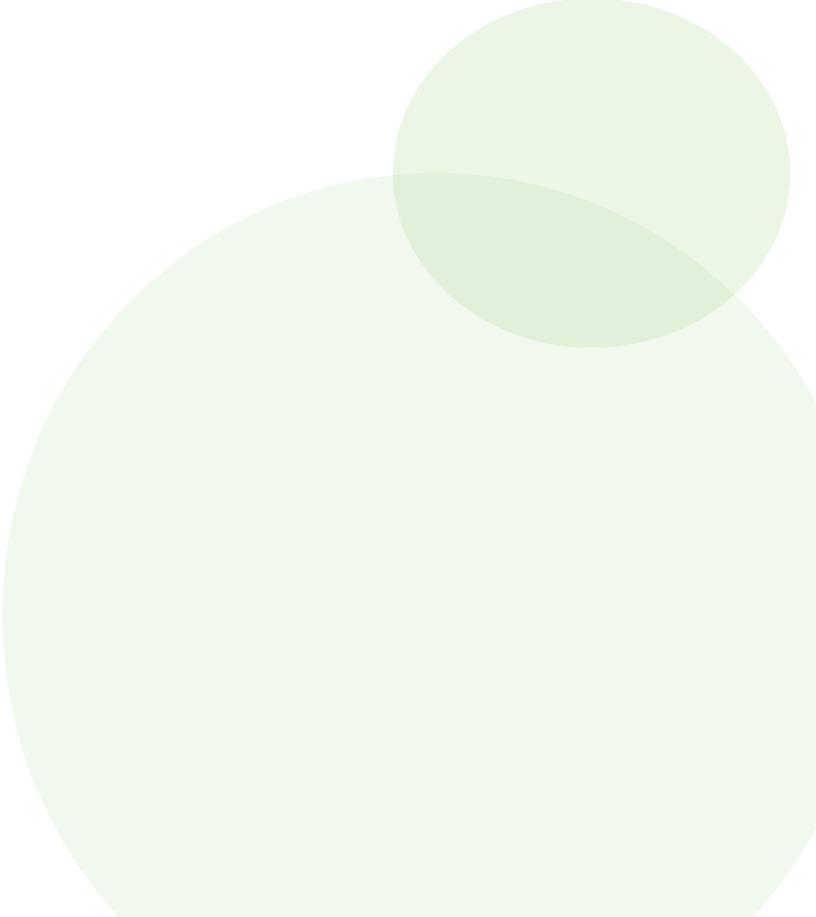
There must be no communication of the following information:

1. Individual company or industry prices, including differentials, discounts, rebates, allowances, price levels or changes, mark-ups, terms of sale and credit terms.
2. Company plans as regards development, design, production, distribution or marketing of products/services, divestments, closures or expansion.
3. Rates for production or transportation of products.
4. Bids for contracts or procedures for responding to bid invitations.
5. Matters relating to individual suppliers and customers/potential customers, progress on negotiations or content of negotiations.

If at any point during a meeting discussion appears to be breaching policy guidelines, the Chair or a participant should immediately raise their concern and close the discussion.

Note – we may invite external speakers who will share details of their research on RGGOs prices. GGCS is not responsible for that research. GGCS members should not discuss their views on the accuracy of the prices referred to in any research shown.

1. Welcome, introductions and agenda

1. Welcome and introductions – Sue Ellwood
 2. Actions, minutes and matters arising from last meeting – Sue Ellwood/Jesse Scharf
 3. Market and scheme update – Jesse Scharf
 1. RGGO issuing, transfers and retirement
 2. GGCS Data Verification Statements
 3. Notification of sanctions
 4. Scheme Fees for 2026
 5. REA Policy Update – Ciaran Burns
 6. REAL Policy Update – Syed Ahmed
 7. Date of next meeting – Jesse Scharf
- 

2. Actions, minutes and matters arising from last meeting

Minutes

- Circulated after last meeting. Available in the GGCS Oversight Panel – [shared folder](#)
- No comments have been received

Actions from Previous Meeting

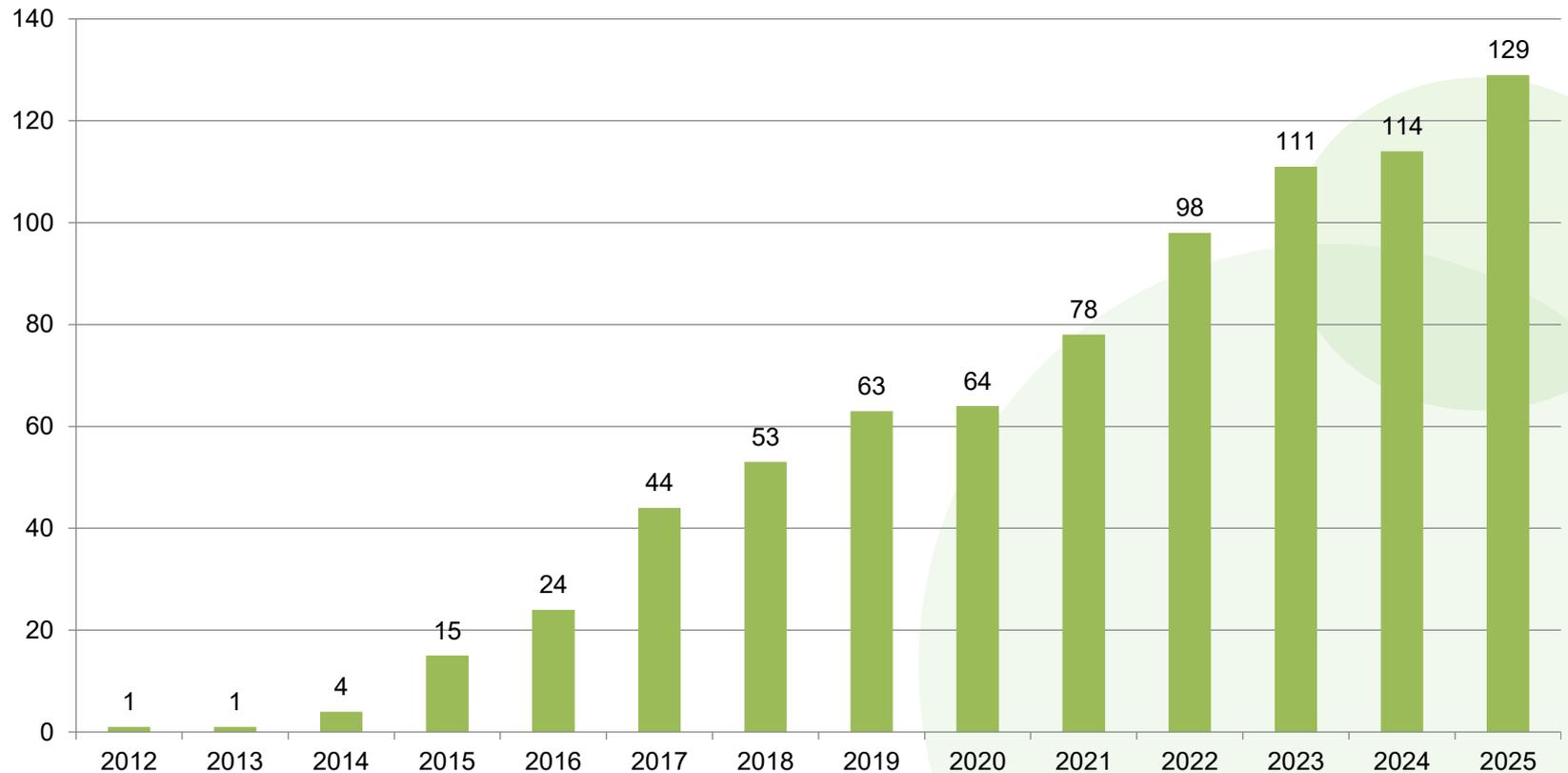
- There were no actions arising from the previous meeting

3. Market and Scheme Update

	Number of plants
NDRHI sites (scheme closed but some sites still commissioning)	143
Green Gas Support Scheme (Tariff Guarantees issued)	18
Green Gas Support Scheme (GGCS members)	12
Plant decommissioned/long term shutdown/liquidation	5
GGCS Producer Accounts	129

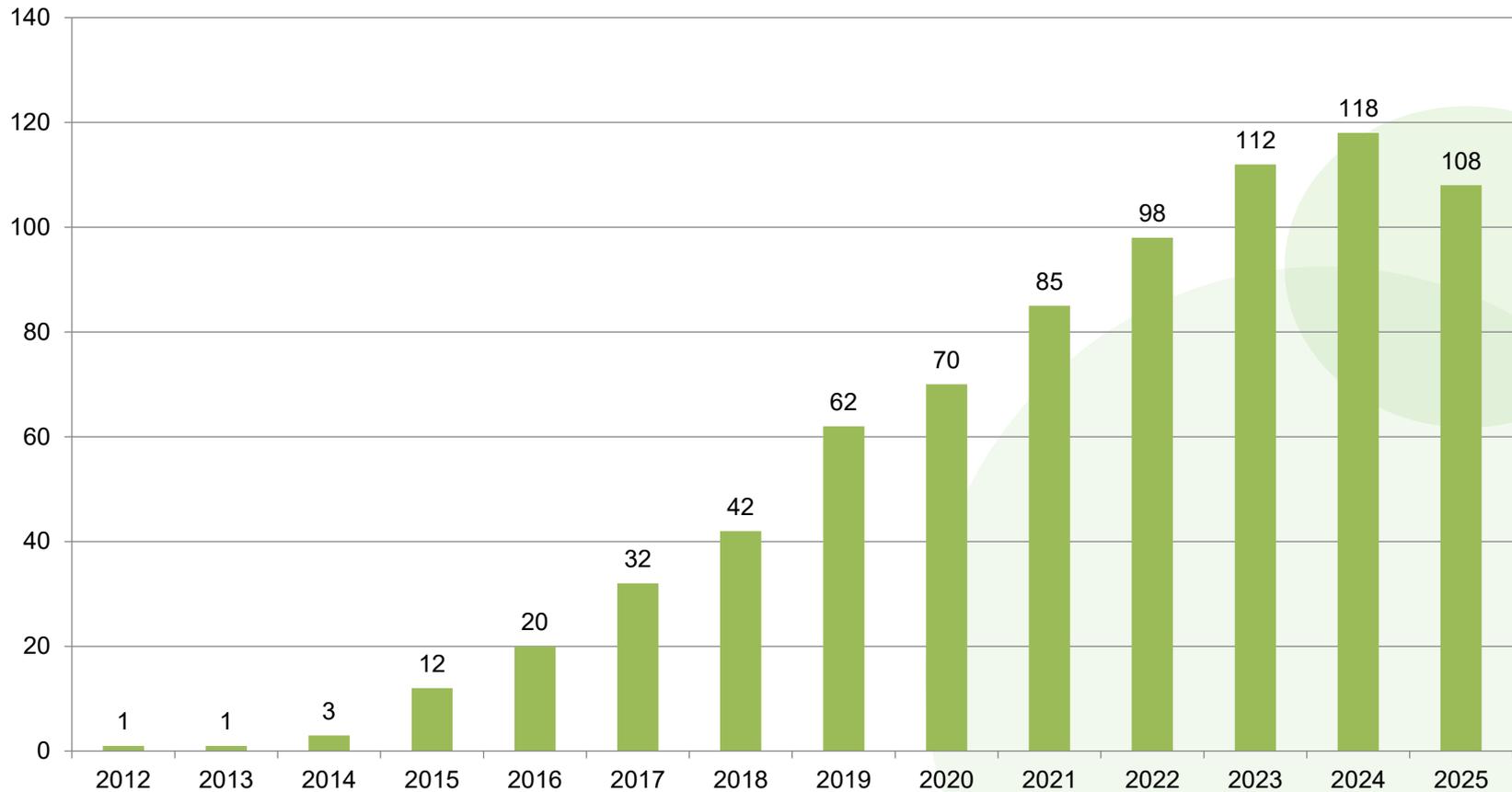
[Green-Gas-Support-Scheme-GGSS-Quarterly-Report-Issue-16.pdf](#)
for more information on GGSS

Number of GGCS Producer Accounts

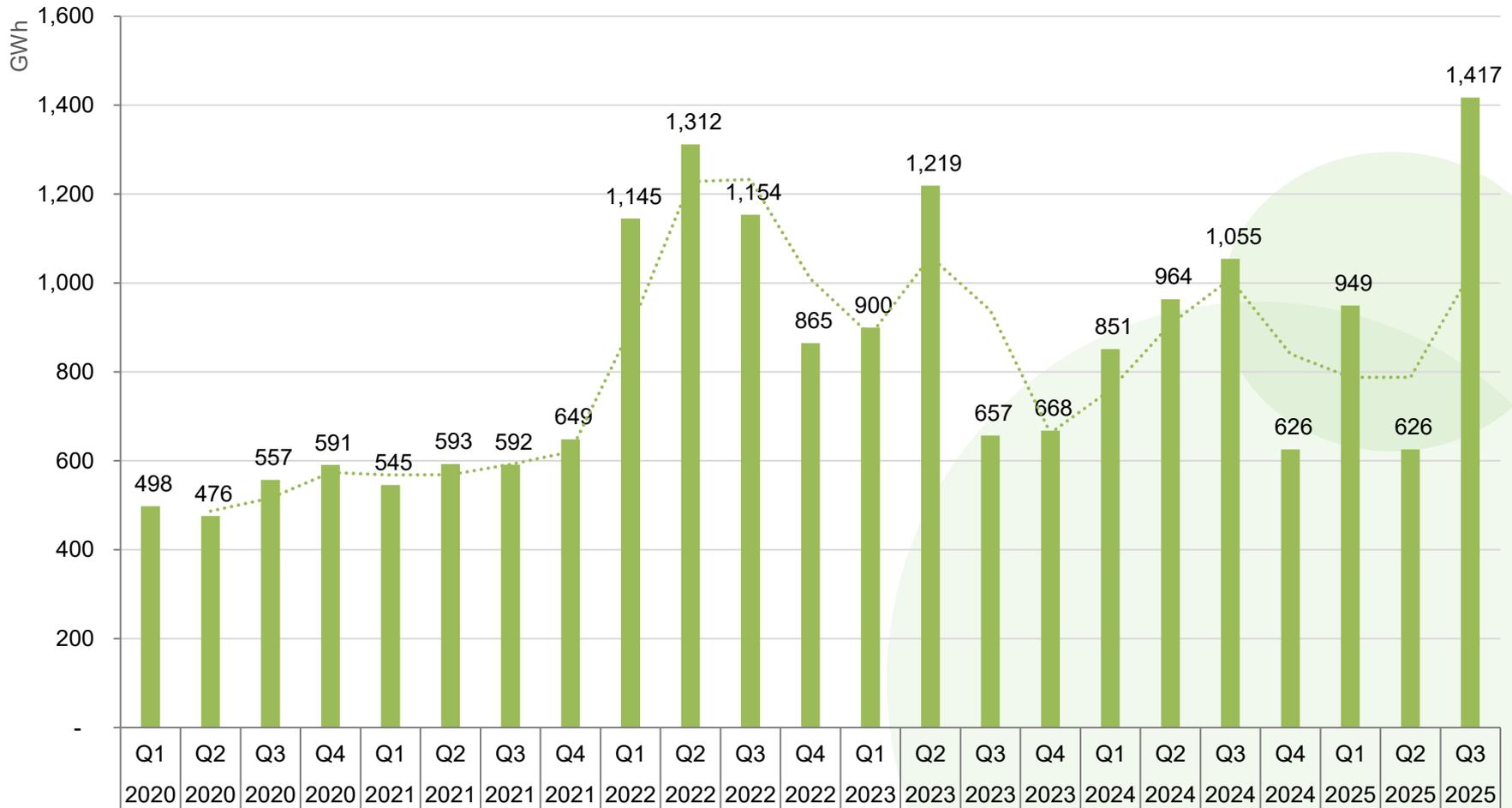


Number of GGCS Trader Accounts

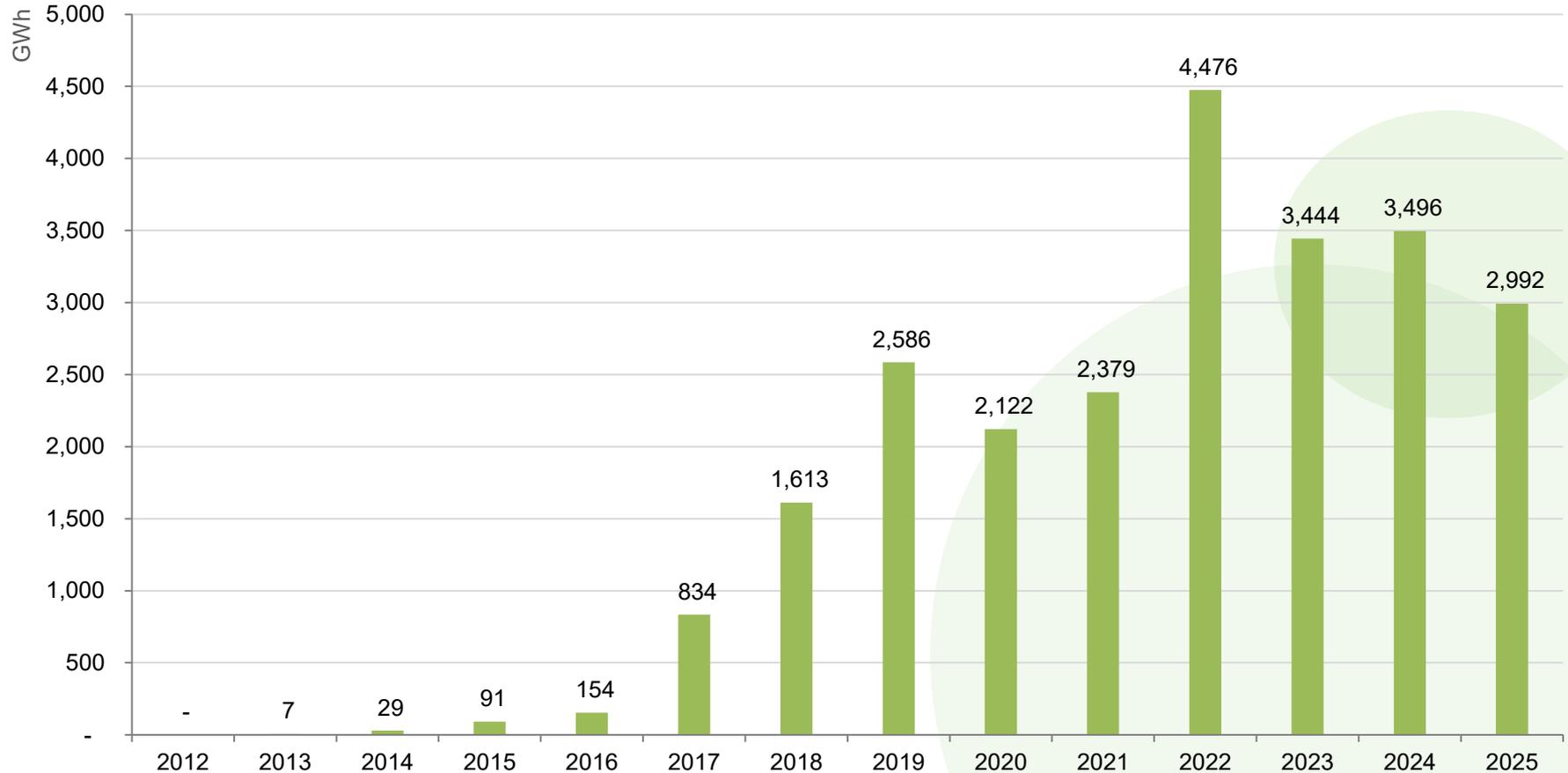
(NB: reduction in numbers in part due to closure of accounts linked to producers after integration of trader functions into producer accounts in new IT/G-REX)



RGGOs Cancelled by Quarter



RGGOs Cancelled by Year (Q3 numbers)



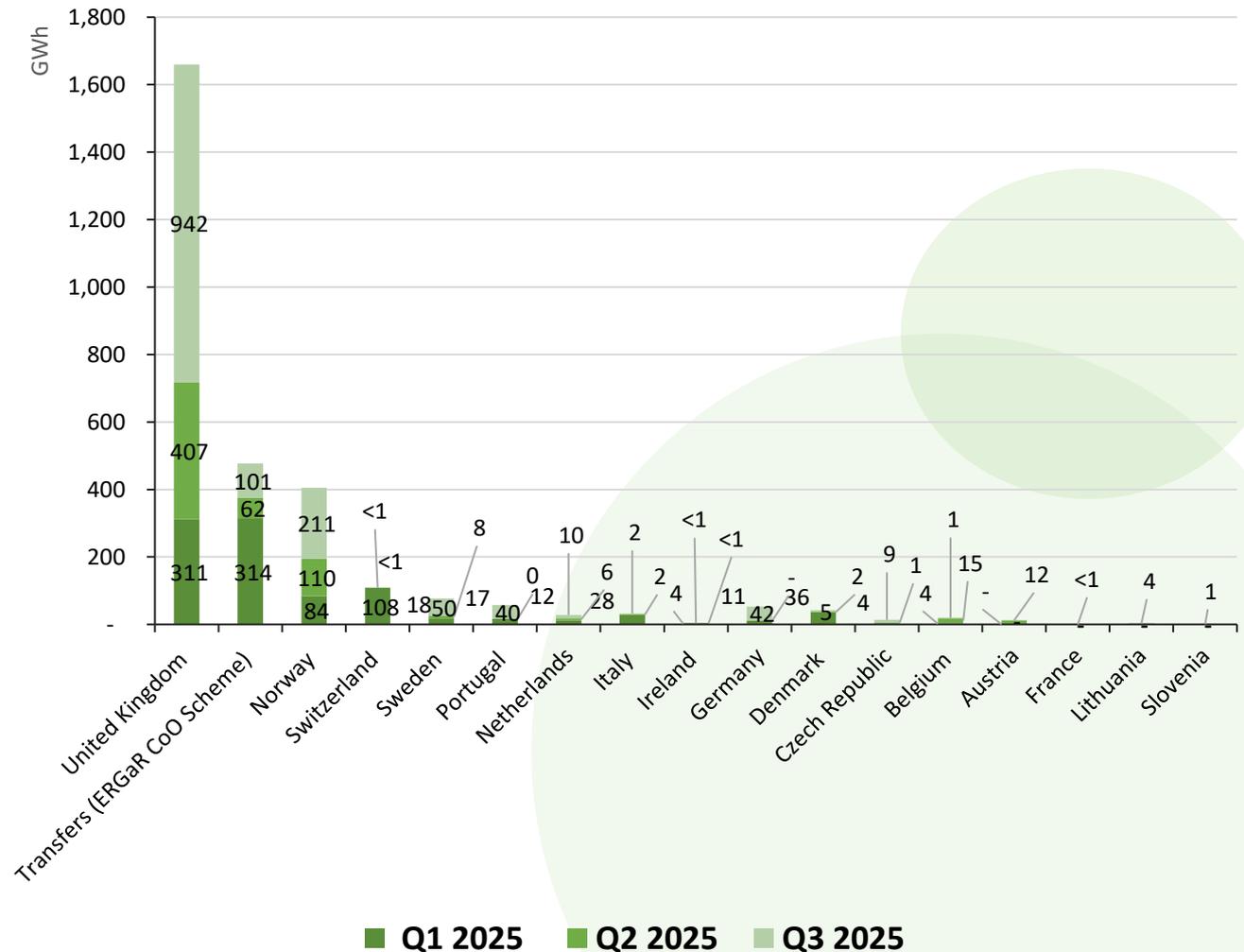
RGGOs Transferred or Cancelled by Country of Consumption (During Q1-Q3 2025)

Values are stacked by quarter. Refer to shading colour in key at bottom of graph.

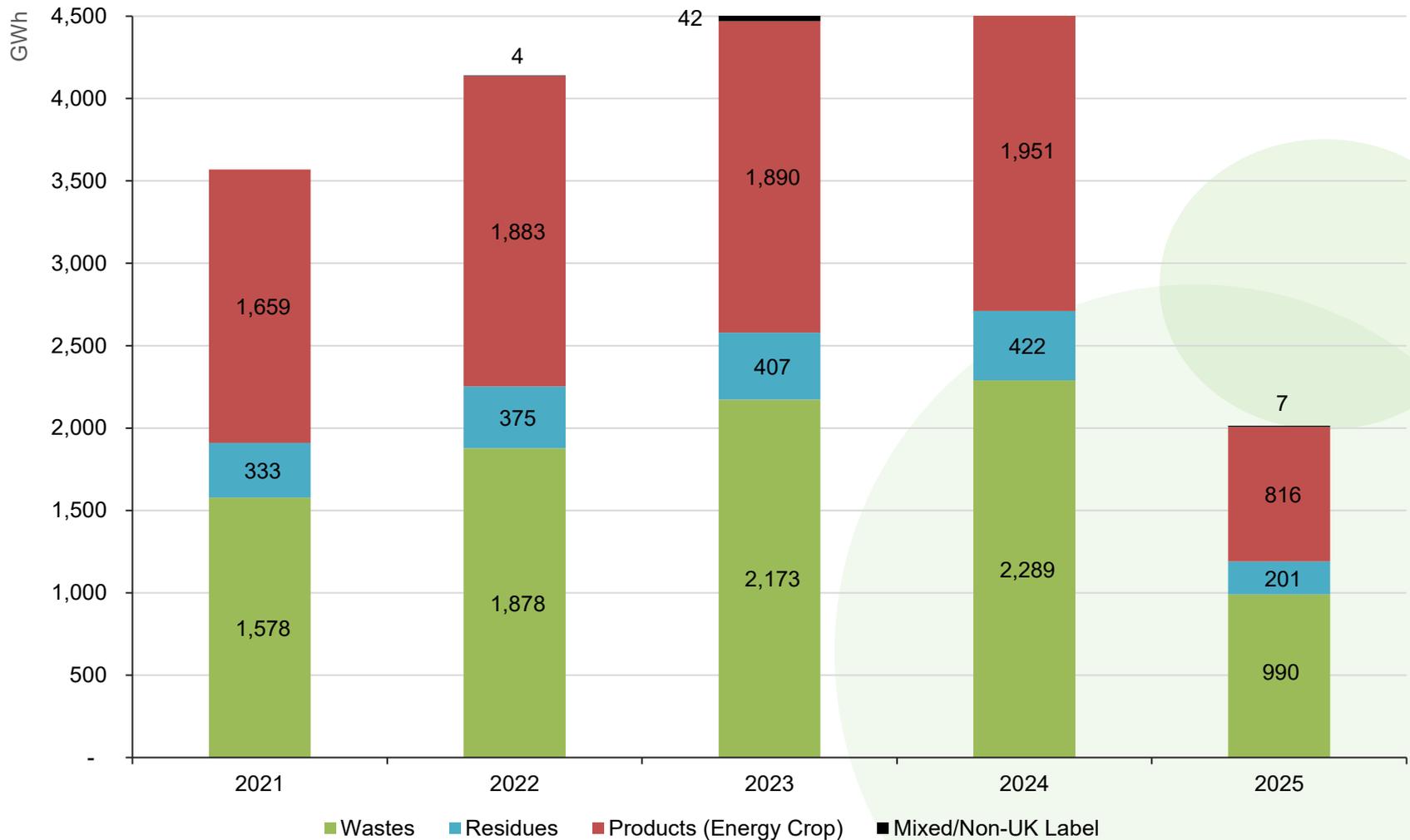
GWh recorded as cancelled outside the UK have been cancelled "ex-domain" i.e. directly from a GGCS account without transfer to another registry, towards gas consumption in the country named.

Where RGGOs are transferred to another registry then that registry may or may not be cancelled for consumption in that country. We understand both AGCS and DENA allow ex-domain cancellation.

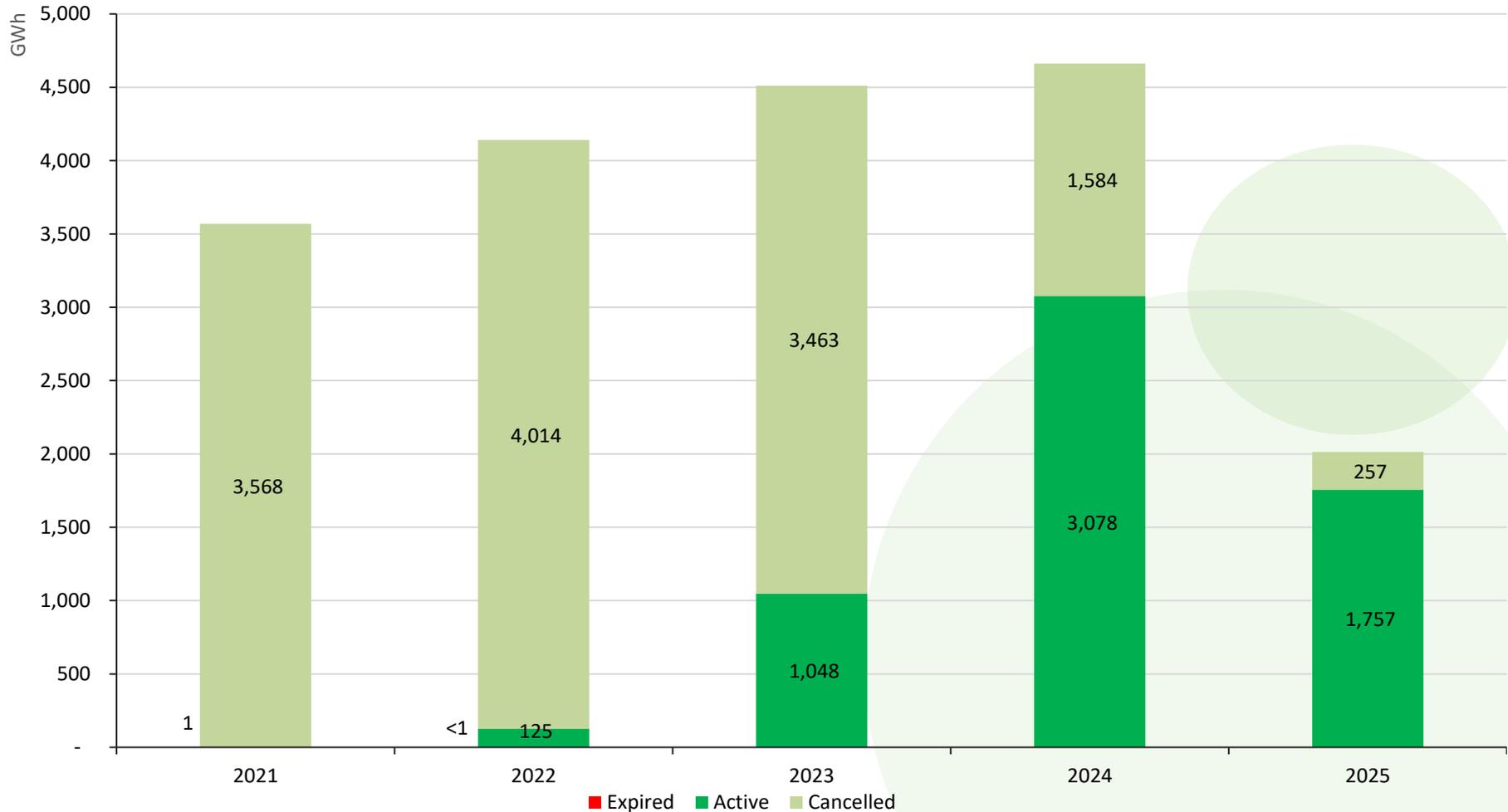
At the end of the year we will provide a breakdown of UK consumption into domestic, non-domestic and transport uses.



RGGOs Issued by Production Year and Energy Source Label



RGGO Status by Vintage (Production Year)



System Update – Withdrawal Report

- We will inform members if they are holding “non-compliant” RGGOs and are affected by any RGGO withdrawal.
- 3 withdrawals in 2025 were from Trader accounts, all others from Producer accounts where non-compliance was identified immediately post issuing or a DVS identified non-compliance.
- **Members reminded of Scheme Rules withdrawal provisions. Recommend providing for potential withdrawals in your commercial arrangements**

Date of report	Number of RGGO withdrawals per quarter
Q1 2023	1
Q2 2023	3
Q3 2023	2
Q4 2023	1
Q1 2024	3
Q2 2024	5
Q3 2024	3
Q4 2024	6
Q1 2025	10
Q2 2025	8
Q3 2025	6

Sanctions

- Check Producer and Trader User Guides for details of our Sanction Policy ([guidance documents folder here](#)).
- Level 4a sanctions require notification of the Oversight Panel
 - “The Scheme Administrator will terminate the letter agreement according to clause 7.1 of the letter agreement. Oversight Panel will be made aware of the identity of the Scheme Participant who has been sanctioned and with consideration for the confidentiality required by the letter agreement, the nature of the non-compliance may be noted.”
 - “the non-compliance has **directly impacted** Scheme Participants who have been involved in RGGO transfers with the sanctioned Scheme Participant”
- No level 4a sanctions have been applied since Nov ‘24
- Official warnings and lower-level sanctions (if applied) are not reported to the Oversight Panel

Production Declaration Templates

- GGCS will only accept Production Declarations that **use the most recent template**. This template is specifically designed to integrate with our API.

Feedstock Source	Most Recent Template Version
Single Feedstock	1.51 or 1.52
Multi Feedstocks	1.61

- Please **do not** reuse Production Declarations templates across Plants. Each plant has its own bespoke Production Declaration designed for our API.

- When completing a Production Declaration, please navigate to the Documents section of G-Rex to download the most recent template.

Plant Details
[Redacted]

Status: Active

GENERAL ORGANIZATION METER LICENSE DOCUMENTS

[Redacted] - Production Declaration Template - v1.61 multi with API [Redacted] - Production Declaration Template -multi energy source v1.61 - with API.xlsx Download Delete

DVS Escalation Process

- We have introduced a new DVS escalation process to improve the timely submission of DVSs
- We understand that there can be delays – the escalation process is designed to address cases where there has been a lack of communication of any issues
- Clause 4.8 of producer contract: *The Producer must provide such third party verification of the data submitted...on an annual basis and agrees to comply with any reasonable request to disclose all records relating to participation in the Scheme*

DVS Status Update

- 3 DVS' Overdue
- 5 ASR/ASARs Overdue

DVS Escalation Process

Sanction Level	When might this level be selected?	Sanction
Official Warning (previously referred to as a Level 0 Sanction)	When a Gas Producer is more than 1 month late in submitting their Data Verification Statement.	The Scheme Participant will be informed that they have received an Official Warning and reminded that this increases the chances of a Level 1 or above sanction being applied in future non-compliance cases.
1	When a Gas Producer is more than 2 months late in submitting a Data Verification Statement.	The Scheme Participant will be informed they have breached the terms of the letter agreement, the Scheme Rules or failed to adhere to guidance, and are expected to put measures in place to reduce the risk that this will occur in the future.

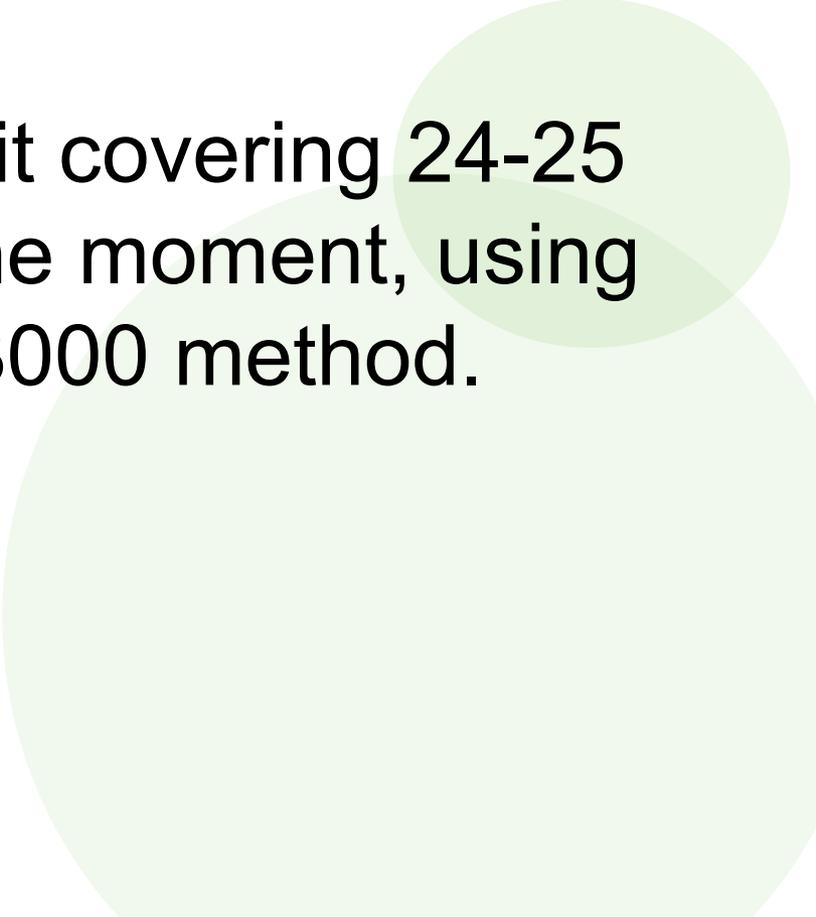
DVS Escalation Process

Sanction Level	When might this level be selected?	Sanction
2	When a Gas Producer is more than 3 months late in submitting a Data Verification Statement.	<p>The Scheme Administrator will give written notice to the Scheme Participant that they consider that there has been a material breach of their obligations of the letter agreement.</p> <p>The Scheme Administrator may lock the Producer or Trader account.</p> <p>The Scheme Participant will be notified that should the breach continue for 90 days, then the Scheme will consider applying a Level 3 sanction, being terminating the letter agreement and thus participation in the Scheme.</p>
3	When a Gas Producer is more than 6 months late in submitting a Data Verification Statement.	<p>The letter agreement between the Participant and the Scheme Administrator is terminated. At that point the participant would no longer be able to access their account on the Registration Database and the RGGOs held in their account would be disposed of by the Scheme Administrator at the instruction of the Scheme Participant (subject to such disposal being deemed by the Scheme Administrator to be compliant with the Scheme Rules and guidance documents).</p> <p>The Scheme Administrator may also, alongside of, or independently of, any decision to terminate the letter agreement, make a claim against the Scheme Participant, in accordance with Clause 6 of the letter agreement.</p>

DVS Escalation Process

Sanction Level	When might this level be selected?	Sanction
4	When a Gas Producer is more than 6 months late in submitting a Data Verification Statement.	<p>The Scheme Administrator will terminate the letter agreement according to Clause 7.1 of the letter agreement. After three months the letter agreement will no longer be in force.</p> <p>From the point of notifying the Scheme Participant of this termination the participant would no longer be able to access their account on the Registration Database and the RGGOs held in their account would be disposed of by the Scheme Administrator at the instruction of the Scheme Participant (subject to such disposal being deemed by the Scheme Administrator to be compliant with the Scheme Rules and guidance documents).</p>

Scheme Auditing

- Our quarterly internal audits have been completed as normal.
 - Our annual external audit covering 24-25 activity is underway at the moment, using limited assurance ISAE3000 method.
- 
- The slide features two overlapping light green circles in the bottom right corner, serving as a decorative element.

Scheme Staffing

- Scheme Director - Jesse Scharf
- Senior Membership and Compliance Officer - Boris Eremin
- Membership and Compliance Officer – Lily Maris
- Support from;
 - Virginia Graham – REAL CEO
 - Syed Ahmed – Policy Analyst
 - Stephen Lister – Legal Advisor
 - Sam Watts – Internal Auditor
 - Sue Ellwood – Chair of Oversight Panel
 - Pamela Taylor – Chair of Compliance Committee

Use of G-REX

- 4eye function can be activated for transfers and/or cancellations
 - First user makes a cancellation or transfer request
 - Second user logs in and confirms request
- Transfers are instant
- We cannot reverse cancellations once they occur so it's important you are confident in their accuracy and have relevant processes in place.
- To activate the cancellation or transfer "4-eyes" function (you can choose one or both) please have someone with the AH ROOT user role email us at info@greengas.org.uk.

Use of G-REX

- Ensure your account users and permissions are up to date
- Lock access when staff leave (you can't delete if they have been active making transfers/cancellations)
- Instructions as follows:
 - Log in
 - Select *Users* from the left hand menu and select *My Organization*
 - Select the relevant person's first name and select "Lock User Access"
 - That user will then have their access to that account (Organisation) blocked. If you have multiple organisations on G-REX you will need to switch Organisation via the menu at the top right and block the user there also.
 - If the User has not completed any tasks on G-REX then you can also select *Delete*. But if they have activity recorded, then the database needs to keep that entry and that user cannot be deleted.

4. Scheme Fees for 2026

- Proposal circulated in advance of the meeting
- We propose to maintain fees at current level
- RGGO Cancellation Fee – 11pence/MWh (also applied when exporting)
- Trader membership fee - £500/year
- Producer membership fee - £250/year 1st plant, £125/year 2nd, 3rd etc.

Scheme Fees

- Oversight Panel is consulted on fees but there is no vote
- Interested to know members views – fees too high? More resources needed on scheme? etc
- Post-meeting we will confirm the fees via email with all members.



REAA policy Briefing

Ciaran Burns

25 November 2025

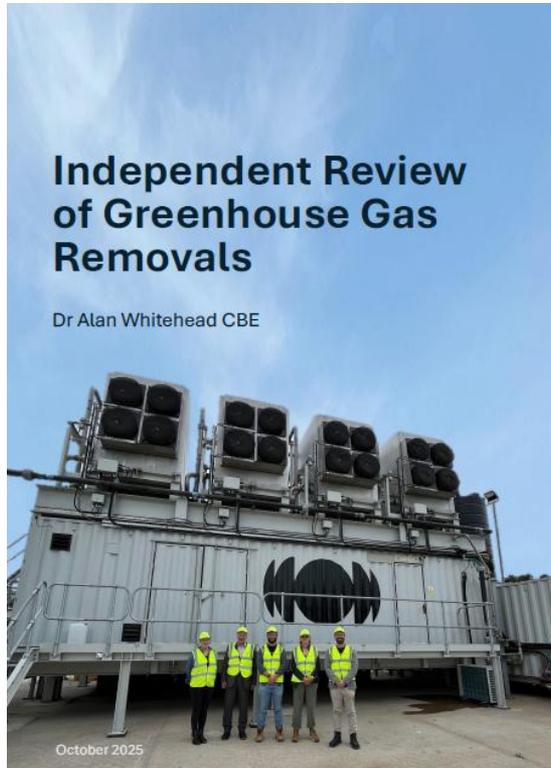
Green Gas Certification Scheme Oversight Panel Meeting



Future Policy Framework for Biomethane Production

- Consultation now expected before end of financial year 31 March 2026
 - Expecting it to be an obligation on gas suppliers/shippers (Renewables Obligation)
 - Working with Defra to ensure value of digestate is realised
 - Recognising value of bioCO₂
 - Trying to address planning barriers
-
- Expect announcement of GGSS extension from March 2028 (possibly after budget)
 - DESNZ have a 7 or 8 of plants in early development that they would like to capture





- On the whole a positive outcome
- Multiple mentions of AD, biomethane, bioCO₂.
- Described as a **low regrets option**.
- Some criticism that **rotational energy crops** were grouped with **perennial crops**, which compete for land with food crops





Department for
Energy Security
& Net Zero

Dr Alan Whitehead CBE

Minister of State in the Department for
Energy Security and Net Zero

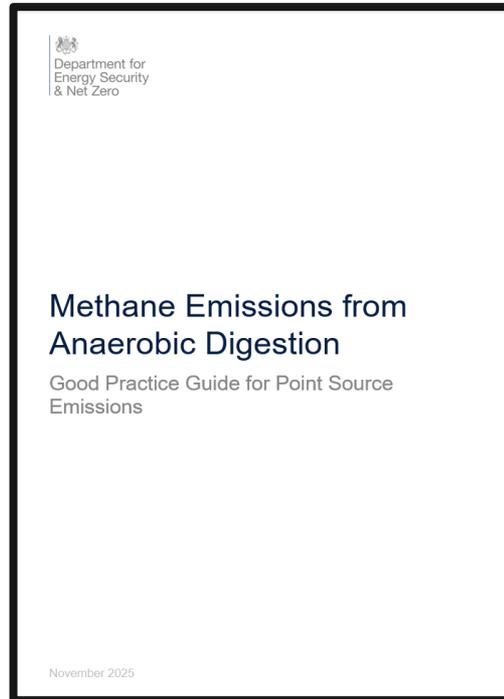
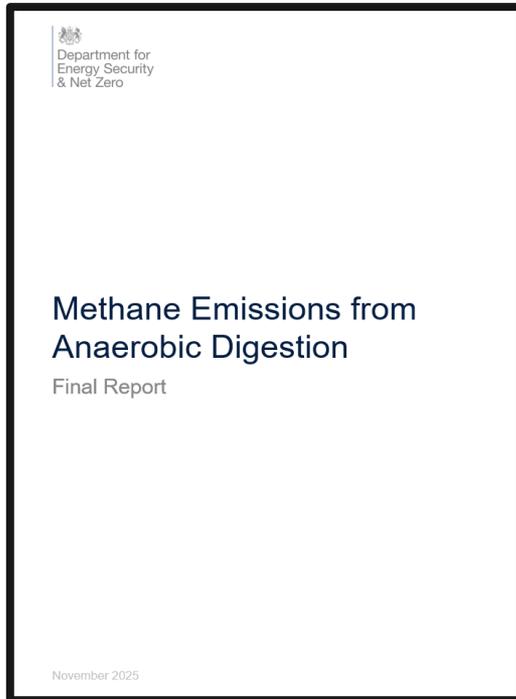
Our Executive Team



Responsibilities include:

- biomethane
- tidal
- geothermal
- individual planning decisions
- all departmental business in the House of Lords





Publication Expected in 2026

Final Report

Presents research gathered on methane emissions arising across each of the key stages of the AD process **feedstock management, digestion, biogas upgrading, digestate storage etc.)**

Good Practice Guide

Includes recommendations on specific assets & elements:

- Digestion tanks
- Biogas upgrading units
- Pressure relief valves
- Ancillary equipment

As well as design, planning, installation, commissioning & operation and maintenance activities.







ORGANICS

Regulation
Permitting
Digestate quality
Feedstock (food waste collections)
Circular Economy



BIOMASS POWER

Bioenergy sustainability
BECCS



LANDFILL GAS

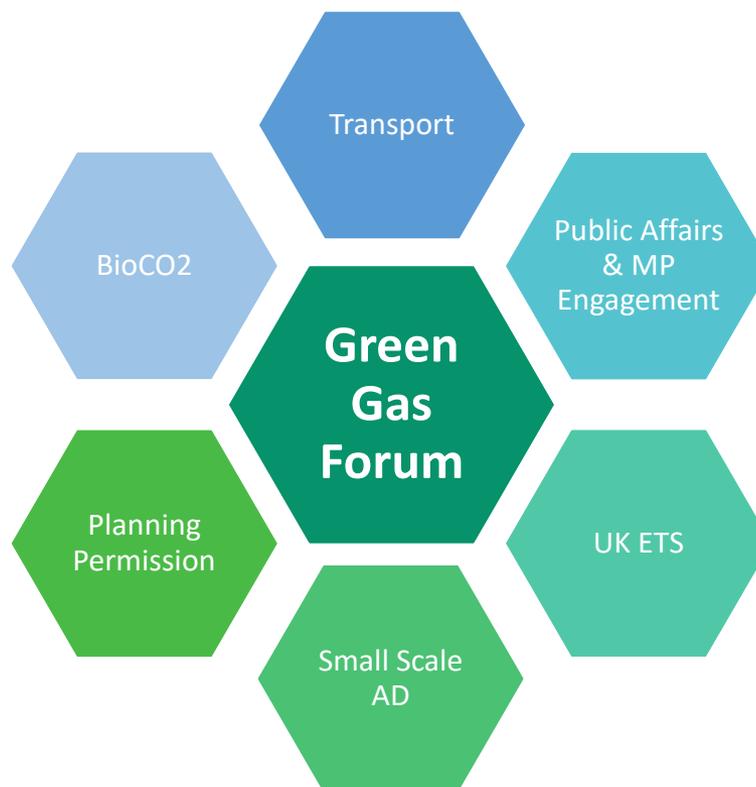
RO Repowering
CCS



Biomethane

- Grid injection
- Scale up
- MP engagement
- Evidence gathering reports
- GDN support
- Entering final year





Green Gas Forum

- Exploitation of existing CO2 use market
- NPT included in CCS clusters
- NPT business model
- NPT consultation due soon

BioCO2

Transport

- HGV & agricultural machinery
- RTFO review in 2026

Public Affairs & MP Engagement

- Ministers and public generally have poor understanding of AD
- Briefing documents
- Site visits
- New councillors in local elections

Planning Permission

- Multiple aspects of AD make planning difficult.
- We will gather data on number of applications, rejections, rejection reasons, regions, etc
- Government reforms of planning regime to boost economy
- Briefing documents for local planners

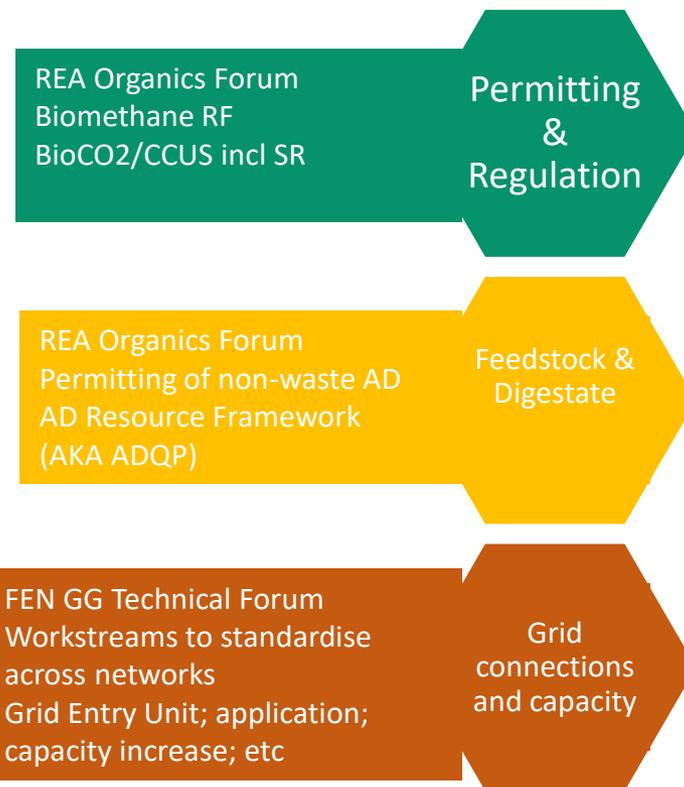
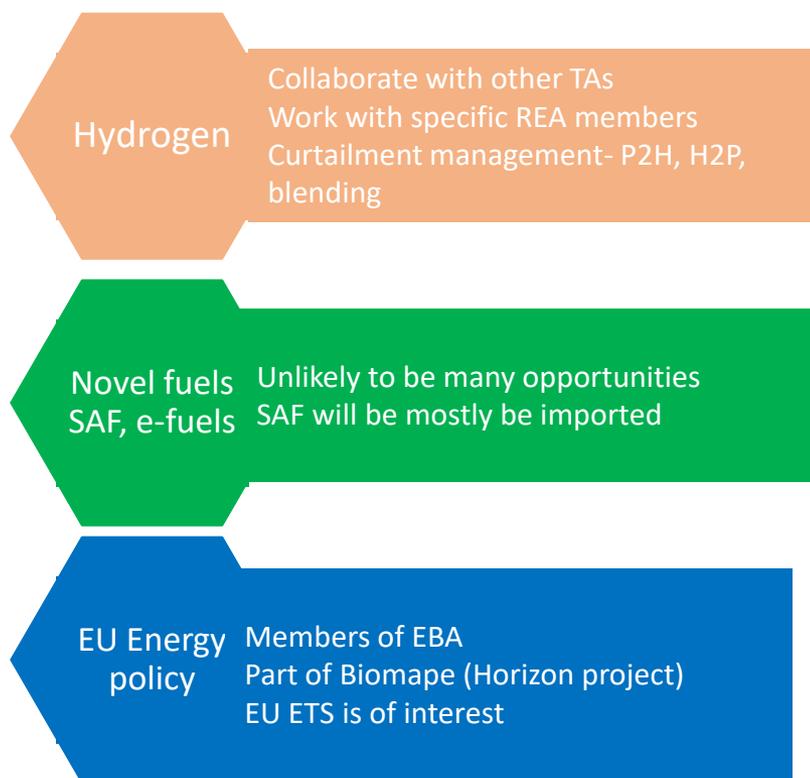
UK ETS

- Potential income to 2050
- GGR will be included from 2029
- EfW will be included from 2028

Small Scale AD

- Unrealised potential 90mt manures/ 9000 farms
- Decarbonising agricultural machinery & power
- 3rd Dec stakeholder event (2nd in series)







Published report	Key outcome
A green gas future: Outlining the feedstock potential for biomethane	Estimates 120 TWh of potential from sustainable crops without impacting food supply
Reducing the cost of Net Zero with biomethane	Could provide whole system savings of between £150-222bn. Could deliver GHG savings below £200/tCO ₂
The role of biomethane in decarbonising and reducing costs in HGVs	Large GHG savings vs diesel. Potential to save 206 million tonnes CO ₂ by 2050 Faster decarbonisation than ZEV (nascent tech)
The renewable pathway to greenhouse gas removals.	Could deliver 17 MtCO ₂ annually by 2050 (22% of removals target) Cheaper (£123/t) than power BECCS (£325/t) and DACCS (£391/t)

Download from here: <https://greengastaskforce.co.uk/key-reports/>





- GVA of developing 120 TWh of biomethane
- Role for biomethane in hybrid heating systems (heatpumps)
- Digestate management and potential to displace fossil-based fertiliser





THE ASSOCIATION
FOR RENEWABLE ENERGY
& CLEAN TECHNOLOGY

Thanks for
listening.

If you have
any
questions,
please reach
out.

Ciaran Burns

Green Gases Policy Manager
cburns@r-e-a.net

Helen Motwani

Head of Heat and Bioenergy
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Jenny Grant

Head of Organics and Natural Capital
jgrant@r-e-a.net



6. REAL Policy Update – Syed Ahmed



GHG Protocol

- Growing **recognition by the green gas sector** of the key role that the GHG Protocol can play in supporting consumer recognition of biomethane/RGGOs
- Let Green Gas Count coalition issued a follow up letter in November 2025 – *“The current absence of clear, interim guidance for renewable gas reporting under Scope 1 has left a critical gap for companies like ours”*
- Market-based accounting method has enabled many companies to reduce their Scope 2 emissions through the purchase of GOs (REGOs in the UK) **and is the basis for companies purchase RGGOs (green gas)**
- Following the 2024 survey on ‘market based accounting’ the GHG Protocol said they wanted focus on **improving the accuracy of clean energy claims**

GHG Protocol Scope 2 consultation

- October 2025 GHG Protocol publish major consultation on Scope 2 Guidance
- Two main proposals are set out in the consultation:
 - **location-based** - requirement is for the renewable generator to be **physically connected to the same grid as the purchasing company**.
 - market-based - the requirement for a **temporal correlation between the production time of the renewable energy being source via a GO, and the energy consumed at the site of the purchasing-organisation**. All contractual instruments would be required to be matched to electricity use on an hourly basis
- A second public consultation on scope 2 topics will follow in 2026, with final publication of the new standard expected in 2027

SBTi corporate net-zero standard consultation

- Consultation launched on 6 November
- Similar themes to GHG Protocol consultation:
 - Tightened integrity for low-carbon electricity (scope 2)
 - geographic matching and establishes temporal matching as a “north star”
 - biomass is certified as sustainable by recognized external certification scheme(s), when available [specific question about this (Q33) in survey]
 - SBTi is currently developing a recognition framework for third-party certification schemes
 - ...they may support the scale-up of low-carbon alternatives at the “activity pool” level by procuring unbundled energy and commodity environmental attribute certificates (EACs) from low-carbon sources

UK Emissions Trading Scheme (UKETS)

DESNZ Secretary of State Ed Miliband responded (September 2025) to industry letter to say:

- *“We understand that how the ETS treats biomethane is an **important issue for operators and the biomethane sector**, and this was considered in our 2024 call for evidence on a future framework for biomethane production.*
“We understand that providing policy certainty is important in enabling investment and supporting sector-wide growth. That is why my Department is developing proposals for a consultation on a future biomethane policy framework, which is expected to be published by the end of the 2025/26 financial year. This will take into account responses to the earlier biomethane policy call for evidence, published in February 2024, and set out proposals for supporting the growth of the sector.
*“**My officials are currently working with the UK ETS Authority to understand whether and how the UK ETS could account for biomethane injected into the gas grid. The ETS Authority has not yet made a decision on whether or when this reform will be made.**”*
- Worth noting the May 2025 UK-EU Reset document mentioned *“22. The United Kingdom and the European Commission welcome continued technical regulatory exchanges on new energy technologies such as hydrogen, carbon capture, utilisation and storage and **biomethane.**”*

...awaiting...

- *“We are now undertaking a broader review of the REGO scheme...”* [July 2023] - intend to consult later in 2023 [recent Daily Telegraph article suggested consult in 2026]
- *Future policy framework for biomethane production: call for evidence* – before end of financial year (March 2026)
- *Fairness and Affordability Call for Evidence* (focuses on rebalancing energy taxation from electricity to gas) – still to come

Date of the next meeting

- May 2026
- Hybrid

