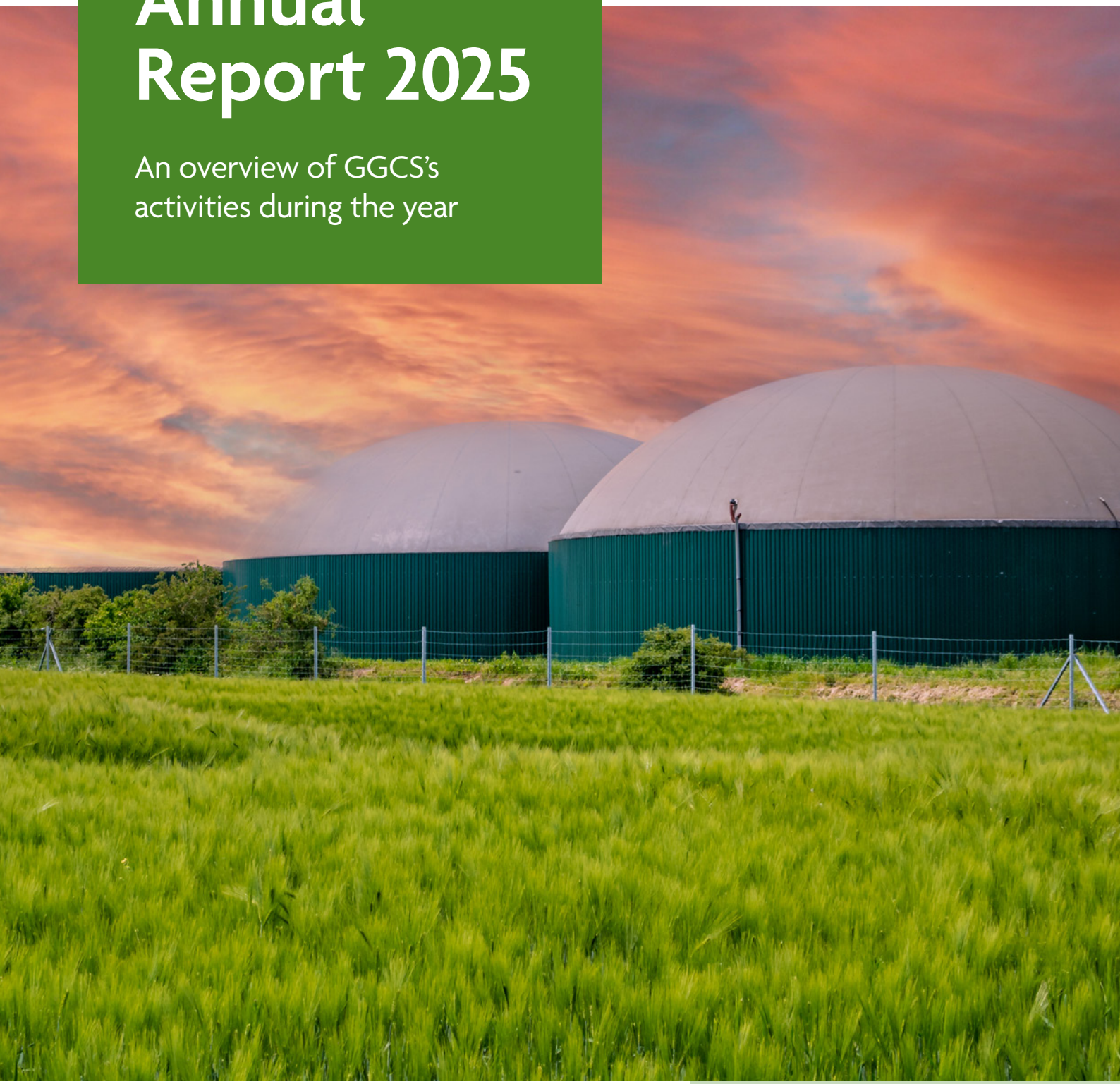
GreenGas
CERTIFICATION SCHEME

Annual Report 2025

An overview of GGCS's activities during the year



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Introduction

Our annual report shows the trends in the RGGO market and gives an overview of the key developments within the Green Gas Certification Scheme (the Scheme).

We hope it will be of interest to existing participants and potential entrants to the biomethane sector, whether you are a producer, trader, consumer, or regulator.

We invite you to contact us to discuss anything within this report.

About REAL

Renewable Energy Assurance Limited (REAL) is the GGCS Scheme Administrator and a wholly owned subsidiary of the Renewable Energy Association (REA), the largest renewable energy and associated clean technology body in the UK.

Our vision is a sustainable, decarbonised, economy, trusted by consumers and built on evidence-based innovation and growth. In 2026 we will be celebrating 20 years of providing trusted, independent assurance that builds confidence across the circular economy and renewable energy sector.

A word from the Scheme Director

As always, our Annual Report is packed with insights into the Scheme's work to provide a means of tracking green gases and generate value for our members. Whether you're new to the sector or a long-standing participant, we hope you'll come away with something valuable.

A key trend in 2025 was a significant increase in the number of active producers to nearly 130, with a number of legacy Non-Domestic Renewable Heat Incentive (NDRHI) projects and the first generation of Green Gas Support Scheme (GGSS) plants coming online.

To keep pace with rising number of RGGOs bundles being issued (340 in 2024, 390 in 2025) we continued to refine our processes and utilise the functionality of our IT platform, G-REX. Complementing this work, we developed a new data-sharing agreement with Xoserve which will give us direct access to injection data, improving reporting accuracy and streamlining operations for the years ahead.

And while biomethane remains the UK's dominant green gas, our scope is expanding. Over the year we worked with National Gas and Centrica to issue the UK's first RGGOs for green hydrogen, welcomed new members in the biopropane sector, and advanced the design of our biogenic CO_2 scheme – set for pilot launch this spring.

We continued to engage at the European level through our position on the board of the European Renewable Gas Registry (ERGaR), with the team there more active than ever in shaping key discussions, from the Union Database for Biofuels to global updates on GHG emissions reporting.

I would like to also take the opportunity to wish a fond farewell to our CEO, Virginia Graham, who retired in December 2025. Her contribution to the creation and evolution of the Green Gas Certification Scheme is too great to summarise here, and everyone involved sends their thanks and best wishes.

As ever, we love hearing from our members and from anyone curious about our work. Please feel free to reach out using the contact details at the end of this report.

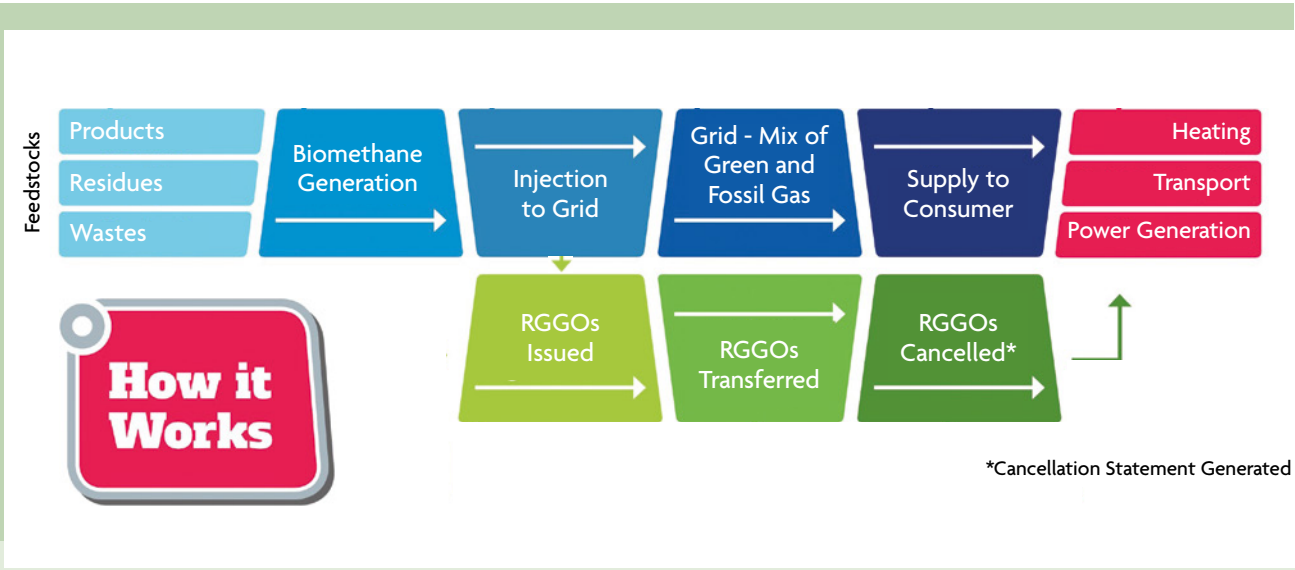
Jesse Scharf
Scheme Director

Abbreviations

gCO_2e	Grammes of Carbon Dioxide Equivalent
GWh	Gigawatt Hour (measured at the Higher Heating Value)
GGCS	Green Gas Certification Scheme
GGSS	Green Gas Support Scheme
GoO	Guarantee of Origin
GHG	Greenhouse Gas e.g. CO_2, Methane
GHGP	Greenhouse Gas Protocol
I&C	Industrial and Commercial
kWh	Kilowatt Hour (measured at the Higher Heating Value)
MJ	Megajoule (1 kWh = 3.6 MJ) (measured at the Higher Heating Value)
NDRHI	Non-Domestic Renewable Heat Incentive
RGGO	Renewable Gas Guarantee of Origin
RTFO	Renewable Transport Fuel Obligation
SBTi	Science Based Targets initiative
TWh	Terawatt Hour (measured at the Higher Heating Value)

How the GGCS works

The GGCS issues, tracks, and cancels Renewable Gas Guarantees of Origin (RGGOs) within a secure account-based online database.



As shown in the diagram, RGGOs sit alongside the physical production, transport, and consumption of gas. As green gas is mixed with fossil gas in the grid, it cannot be physically tracked, with RGGOs providing a method of matching gas consumed from the grid with units of green gas that are injected, ensuring they are only counted once and allocated to one consumer.

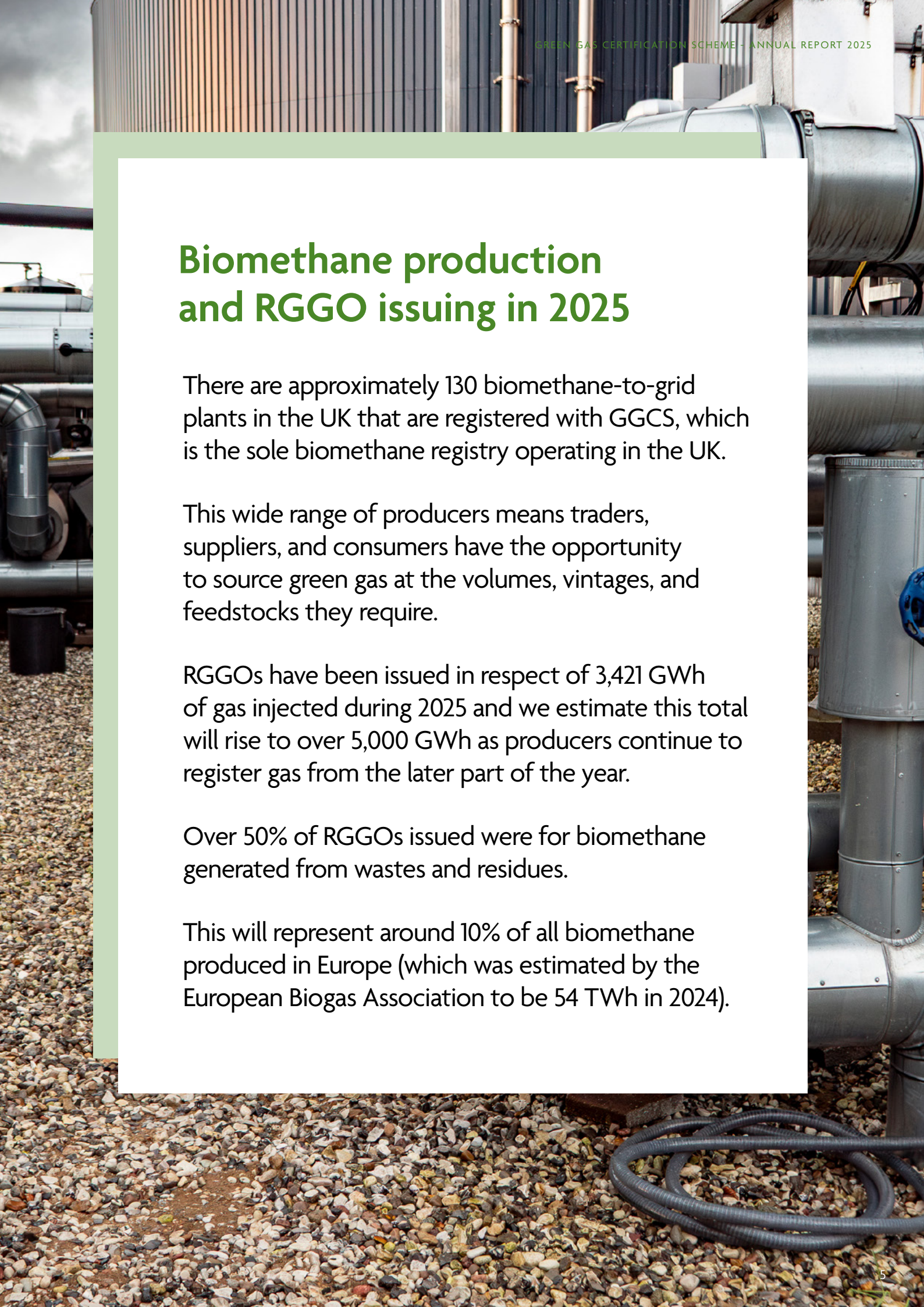
The process starts with a green gas producer submitting a package of evidence to the GGCS, showing the amount of gas they have injected and the inputs into the processes e.g. food waste or crops, and confirming that relevant sustainability criteria have been met.

Once the RGGOs are issued, they can be transferred from account to account as desired, and then allocated to gas consumers.

When allocated to a gas consumer, or group of consumers on a tariff, RGGOs are cancelled and listed on a Cancellation Statement.

This Cancellation Statement is provided to the consumer in the form of a PDF file or a URL linking to a webpage, which shows the RGGOs that have been allocated to them. These statements are used as evidence that consumers are using green gas and allow them to make various claims depending on which Greenhouse Gas reporting frameworks are relevant to them.

By carefully controlling the number of RGGOs issued and ensuring that they are cancelled at the point they are allocated to a consumer, the GGCS protects against double counting and consumers can in this way buy green gas with confidence.



Biomethane production and RGGO issuing in 2025

There are approximately 130 biomethane-to-grid plants in the UK that are registered with GGCS, which is the sole biomethane registry operating in the UK.

This wide range of producers means traders, suppliers, and consumers have the opportunity to source green gas at the volumes, vintages, and feedstocks they require.

RGGOs have been issued in respect of 3,421 GWh of gas injected during 2025 and we estimate this total will rise to over 5,000 GWh as producers continue to register gas from the later part of the year.

Over 50% of RGGOs issued were for biomethane generated from wastes and residues.

This will represent around 10% of all biomethane produced in Europe (which was estimated by the European Biogas Association to be 54 TWh in 2024).

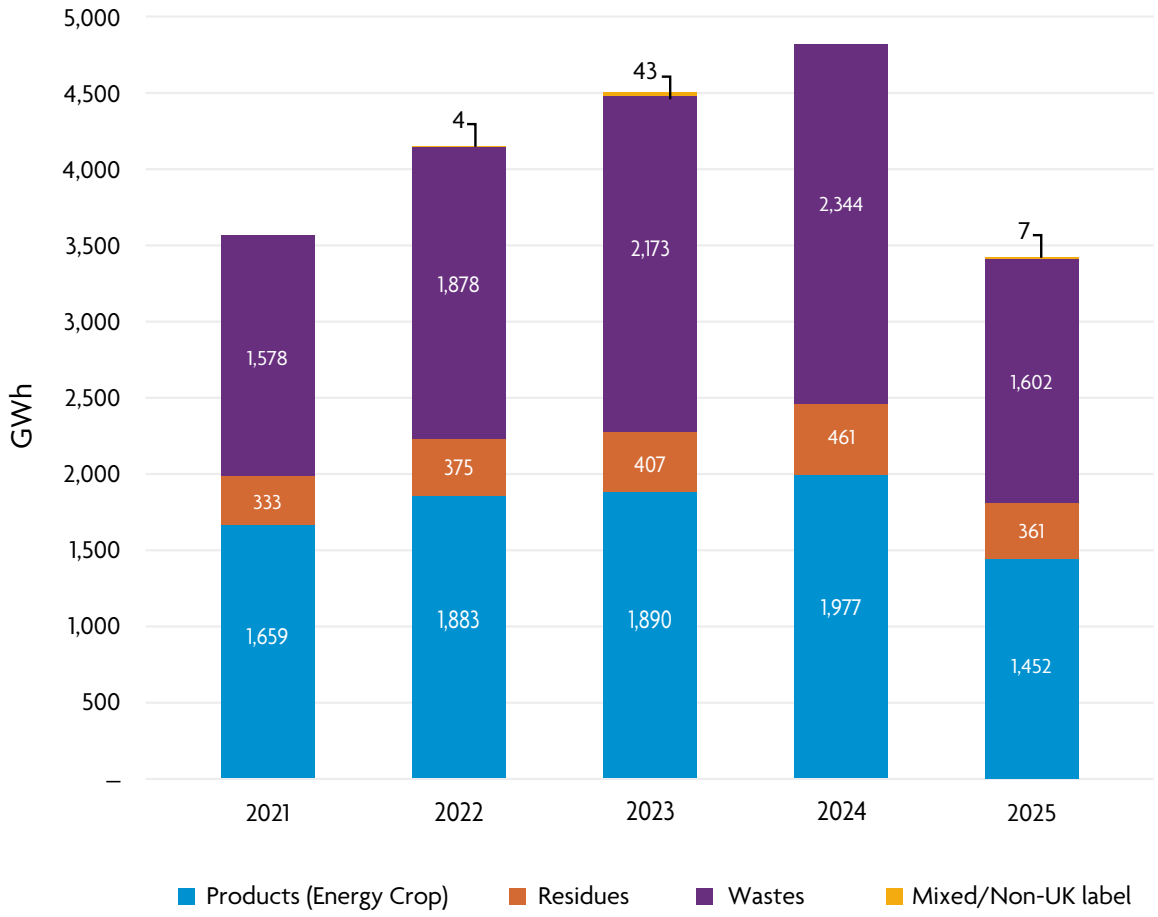


Figure 1 - GWh of RGGOs issued by feedstock type (as of 30/01/2026)[1]

Prospects for growth

The Non-Domestic Renewable Heat Incentive (NDRHI) closed to new applications in 2021, but some plants have only recently been built and several of these joined the Scheme in 2025. 10 Green Gas Support Scheme (GGSS) plants also joined the scheme during the year, indicating progress with the development of the current generation of projects.

The UK Government has extended the scope of the GGSS so that new plants can commission up until 2030, and is continuing to develop its plans for a successor mechanism to the GGSS, supporting the long-term growth of biomethane production in the UK.

We expect further details on the successor mechanism in spring 2026, which may also provide a view on the long-term role of the green gas certificate market.

1. GGCS commonly uses evidence of subsidy payment to issue RGGOs. These payments come at the end of quarterly injection periods and there may be delays with payment or with producers registering RGGOs with the GGCS. The graph provides our most recent assessment of RGGOs issued for 2025 production. The total GWh value will continue to rise as more plants register their volumes from the year.

Biomethane traders

There are approximately 108 trader accounts registered with GGCS. This is a slight decrease from previous years, in part due to the integration of trader functions into producer accounts during the transition to G-REX in 2024.

Traders offer a diverse range of services to our producer members, providing them opportunities to sell their RGGOs in one-off transactions or via multi-year agreements and have RGGOs exported to the DENA Biogas Register in Germany and the Pronovo biogas register in Switzerland.

Around 20 of our trader members are ISCC-certified and therefore able to handle Proof of Sustainability (PoS) documents generated by ~60 certified UK producers.

A full list of trader accounts is available on our website here – www.greengas.org.uk/certificates/for-sale.

RGGO cancellations and exports

RGGOs are cancelled when purchased by individual gas consumers or those that are part of a shared green gas tariff. When RGGOs are transferred to an account in another registry, such as the DENA Biogas Register, they are marked as exported.

Demand categories for RGGO cancellations and exports

Cancelled to a consumer in the UK

Account holders must record the location of the consumer and we can therefore identify when they are based in the UK.

Each year, we review the names of the consumers listed and categorise them as:

- Domestic.
- Non-Domestic.
- Transport.

For example, a cancellation labelled as "cancellation for domestic green gas tariff" is categorised as Domestic, and a cancellation that names a limited company is categorised as Non-Domestic.

Relevant information is not always available so the volumes recorded in each category are indicative.

Cancelled to a consumer outside the UK (ex-domain)

Where cancellations identify consumers not located in the UK, they are considered "ex-domain" (with the UK being the "domain" of the GGCS).

Each year, we review the names of the consumers listed and categorise them as:

- Domestic.
- Non-Domestic.
- Transport.

For example, a cancellation labelled as "for gas used in vehicle fleet" is categorised as Transport and a cancellation that names a limited company is categorised as Non-Domestic.

Relevant information is not always available so the volumes recorded in each category are indicative.

Exported

RGGOs can be exported to other registries via the European Renewable Gas Registry Certificate of Origin (ERGaR CoO) Scheme.

Once exported, we do not receive any information on the location or type of consumer to whom the RGGOs are cancelled, although we assume that they are not located in the UK.

Top-line trends

Year-on-year, volumes of RGGOs cancelled or exported increased in comparison to 2023 and 2024, nearing the record volume in 2022. Below we explore where that demand came from, sector by sector between 2021 and 2025.

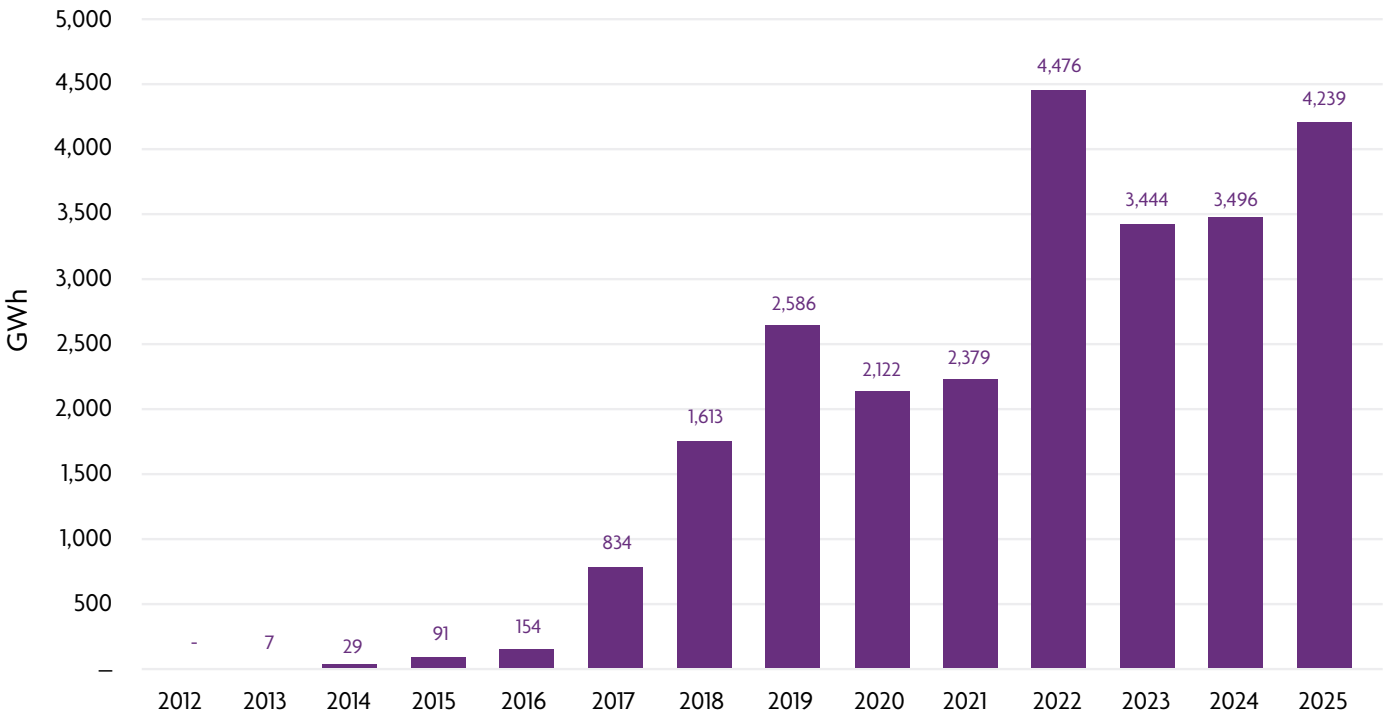


Figure 2 - GWh of RGGOs cancelled and exported each year

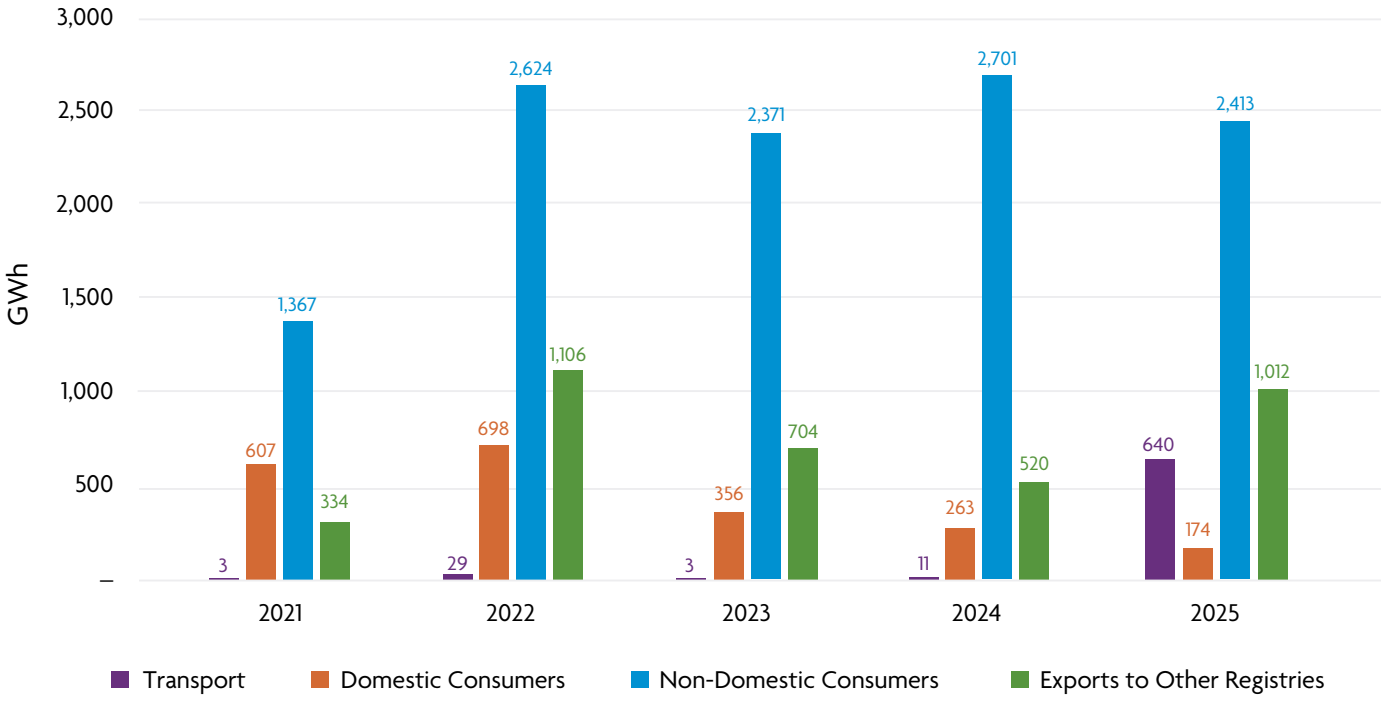


Figure 3 - GWh of RGGOs cancelled and exported each year (by sector)

Cancellations for Non-Domestic consumers remained high relative to the other sectors. Cancellations for the transport sector reached a record volume, with approximately 640 GWh cancelled for transport. Demand for cancellations on behalf of Domestic Consumers continued to decrease on a yearly basis. Exports to Other Registries neared the record volume of 2022.

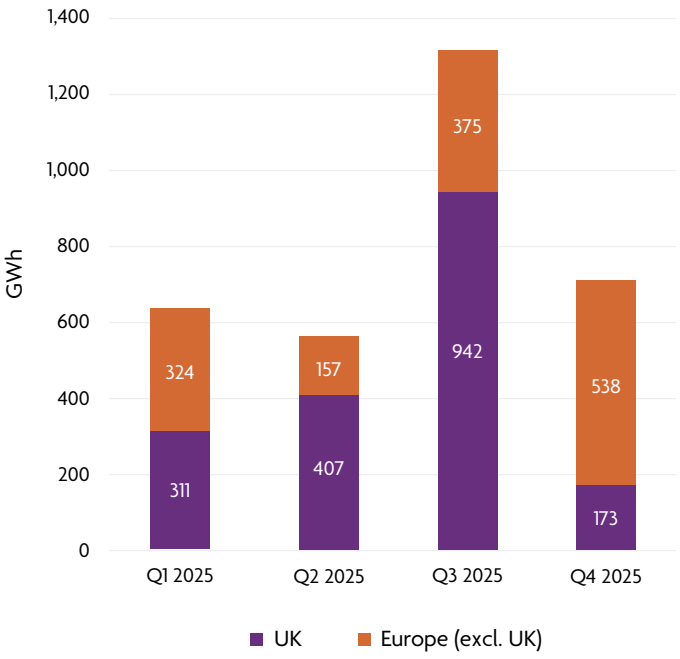


Figure 4 - GWh of RGGO cancellations by region (does not include exports)

Cancellations for consumers in the UK accounted for 57% of RGGOs cancelled in 2025. The last quarter of the year saw an uptick in the volume of RGGOs cancelled for consumers in Europe and a decline of RGGOs cancelled for consumers in the UK.

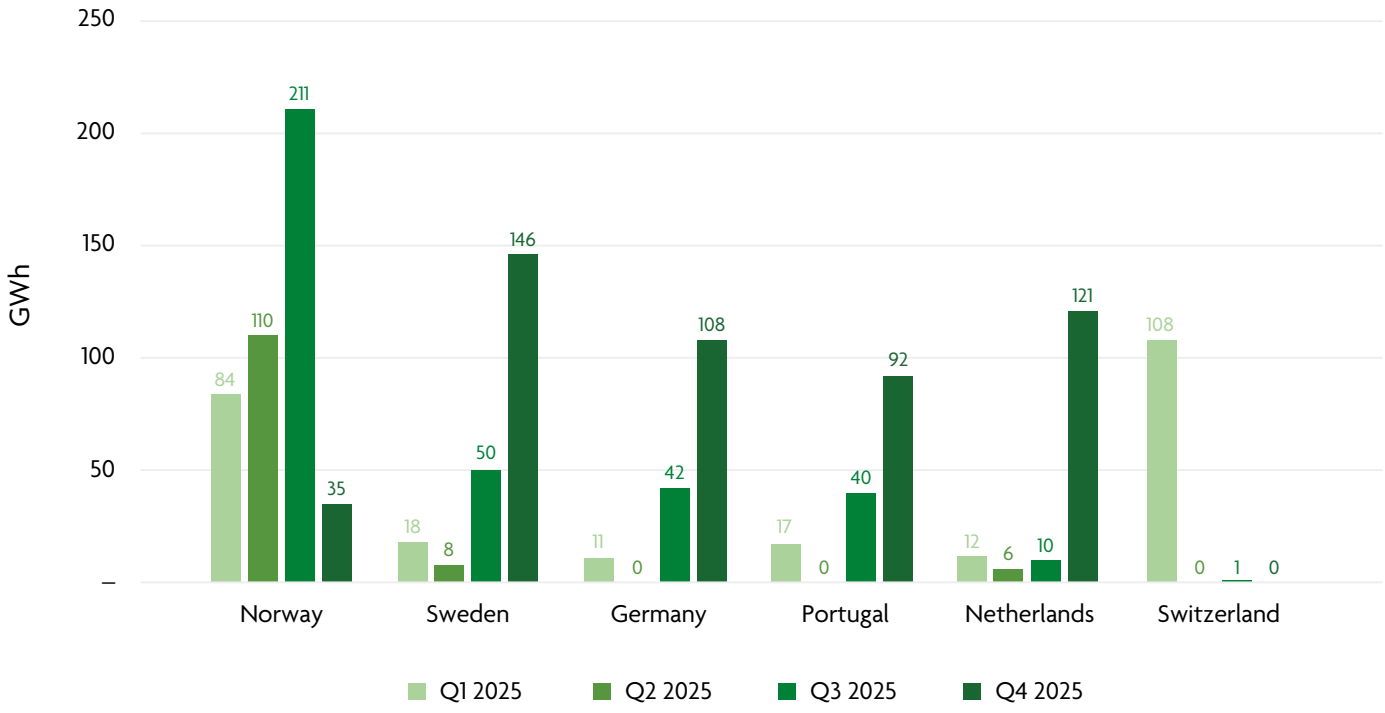


Figure 5 - GWh of RGGO cancellations for European consumers (excluding the UK)

Cancellations for Europe (excluding the UK) were largely driven by consumers in Norway, Sweden, Germany, Portugal, Netherlands, and Switzerland. Consumers in these countries accounted for 88% of the total RGGOs cancelled for consumers outside the UK.

Cancellations for consumers in Switzerland dropped from Q2 onwards. This mirrored the trend for exporting RGGOs to the Pronovo biogas register in Switzerland, which was possible from March onwards and grew during the year, suggesting that demand was diverted from cancellations to exports.

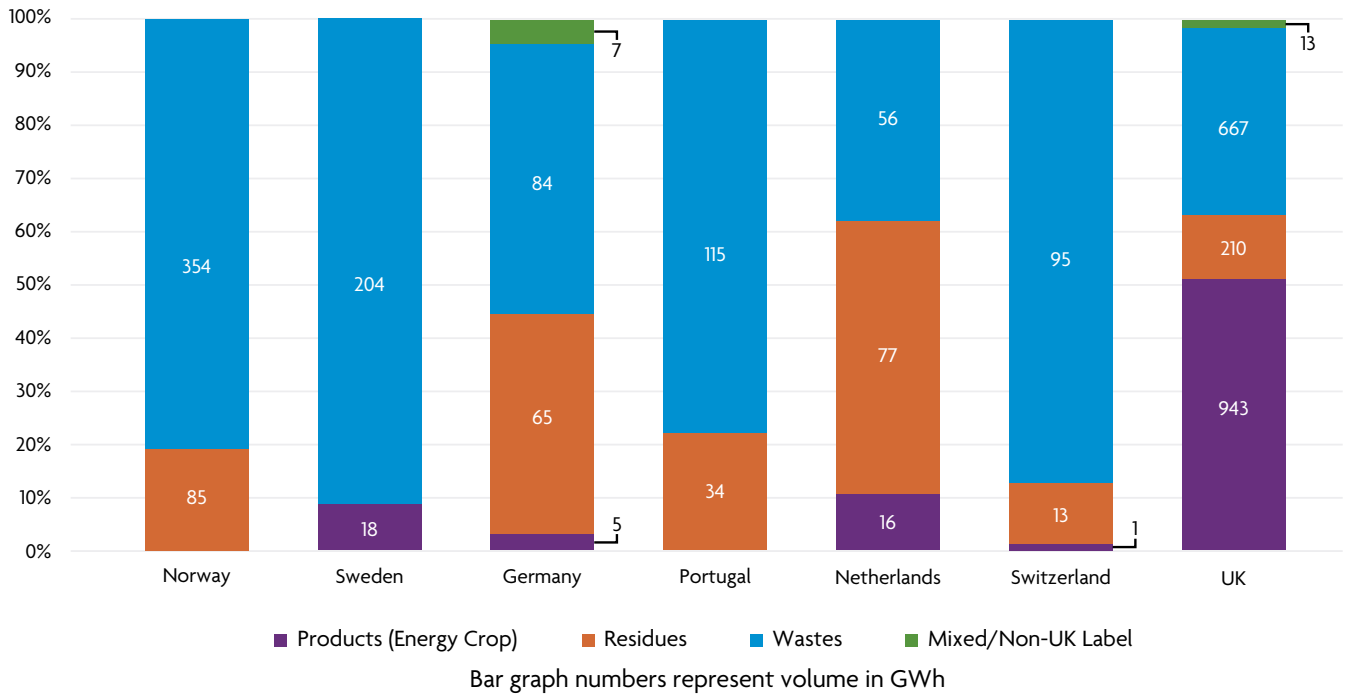


Figure 6 - GWh of 2025 RGGO cancellations for European consumers by feedstock type (does not include exports)

Biomethane from waste and residue inputs accounted for 96% of RGGOs cancelled for consumers in Norway, Sweden, Germany, Portugal, Netherlands, and Switzerland, compared to 48% of RGGOs cancelled for consumers in the UK.

Biomethane generated from wastes accounted for 89% of RGGOs exported to the Pronovo biogas register in Switzerland, with the remainder from residues. Pronovo does not accept exports of product-based RGGOs.

In contrast, 56% of RGGOs exported to the DENA Biogas Register in Germany were for biomethane from products, with wastes and residues making up the remaining 44%.

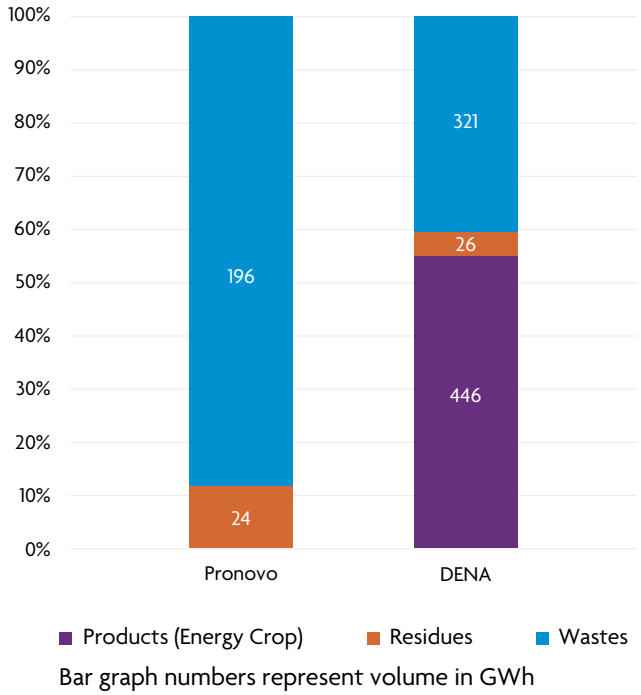


Figure 7 - GWh of 2025 RGGO exports by feedstock type

Transport

RGGOs allocated to transport are based on biomethane that has received the NDRHI and are generally used for voluntary emission reporting purposes, or for the provision of a green gas tariff at public fuelling stations. RGGOs can also be allocated to buses and a small benefit claimed from the UK Government as part of the Bus Service Operators Grant (BSOG). These volumes do not reflect the amount of biomethane awarded Renewable Transport Fuel Certificates (RTFCs), which is generally based on imported biomethane that does not have a RGGO attached.

In 2025, no RGGOs were cancelled for transport in the UK while a record volume of 640 GWh were cancelled for transport in Europe. These RGGOs supported green gas tariffs at fuelling stations in Belgium, Netherlands, Norway, Portugal, and Spain.

Domestic consumers

RGGOs cancelled for domestic consumers decreased in 2025 compared to the previous year, continuing a trend of the past few years. There are now only four green gas tariffs on the UK domestic market and demand from non-UK domestic tariffs also appears to have weakened (we have included ex-domain cancellations where we consider the majority of the supplier's consumers to be domestic; however, we don't collect detailed information on tariff profiles). In previous years Swiss utilities formed a significant portion of the RGGOs we counted in the domestic category and it could be that those tariffs are now sourcing RGGOs via exports to the Pronovo registry.

Non-domestic consumers (NGO, SME, and I&C)

The non-domestic sector fell slightly to 2,413 GWh. The sector remains the primary driver of RGGO cancellations and reflects consistent demand from UK and non-UK consumers.

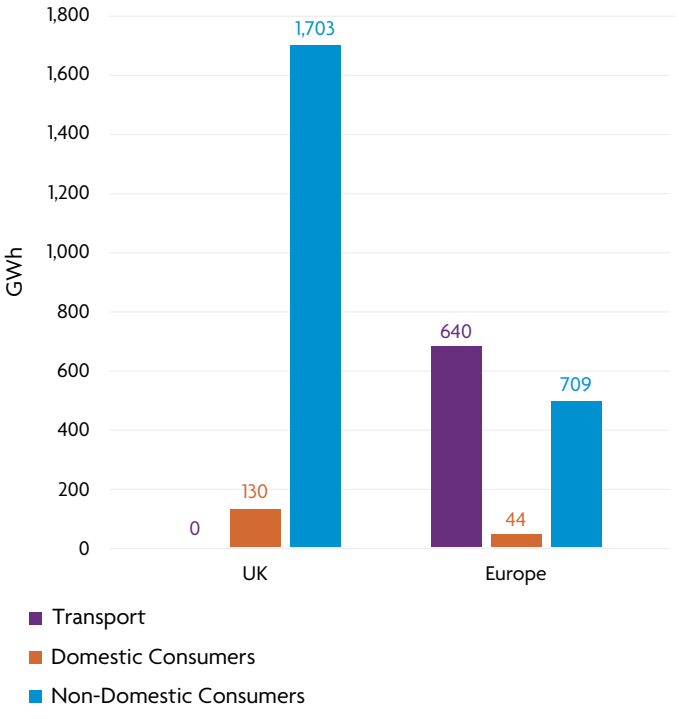


Figure 8 - GWh of 2025 RGGO cancellations by category

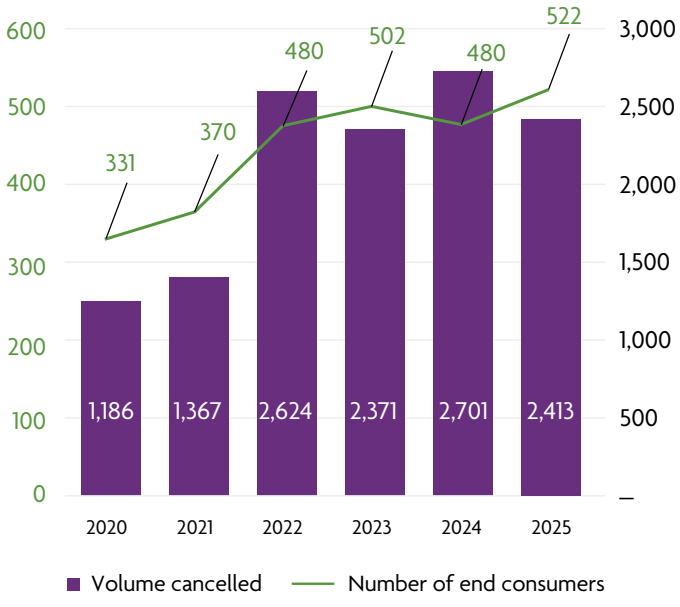


Figure 9 - Number of individual consumers (left axis) with GWh Non-Domestic cancellation volumes (right axis)

Exports to other registries

The Scheme exported 1,012 GWh to other registries in 2025, representing a 94% increase from 2024. This can be partially attributed to exports to Pronovo, with increasing volumes each quarter after the first export was completed in Q2.

Exports to the DENA Biogas Register still accounted for the majority of 2025 exports, with about 794 GWh exported representing a 52% increase from 2024.

Demand from non-UK consumers, via exports and ex-domain cancellations, accounted for 57% of the 4,329 GWh of RGGOs exported and cancelled in 2025, showing the central role of these consumers in the UK RGGO market.

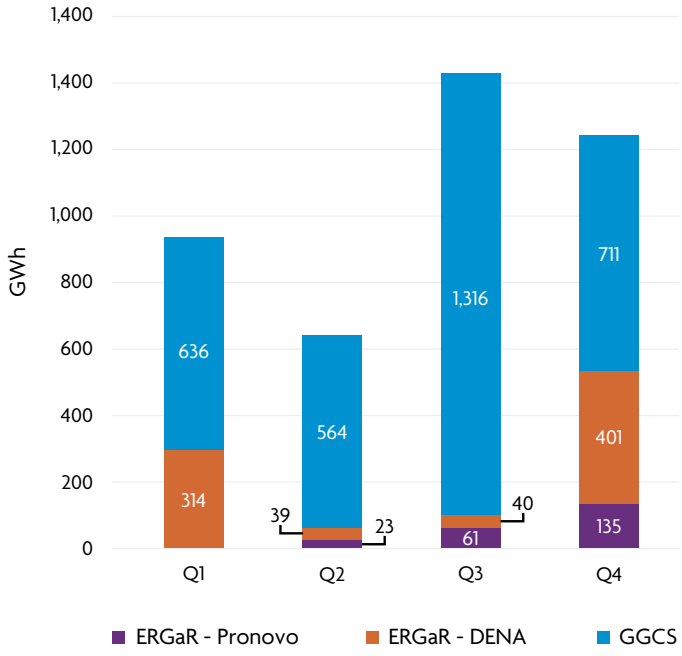


Figure 10 - GWh of 2025 RGGO exports and cancellations per quarter

How is green gas produced?

The GGCS currently issues RGGOs for three types of green gas – biomethane, biopropane, and hydrogen.

Biomethane

Biomethane is produced by the anaerobic digestion of various wastes, residues, and crops. The "raw biogas" produced is put through an upgrading process which removes any impurities and splits the methane from the carbon dioxide (CO_2).

The methane is carefully monitored for purity, and, in most cases, propane is added to bring it up to the calorific values required. It is then injected into the gas network.[2]

The CO_2 stream is either vented to the atmosphere[3] or captured for use in the food industry or in nearby greenhouses to encourage faster plant growth. In the coming years we expect that the biomethane sector will continue to pioneer BioEnergy with Carbon Capture, Utilisation, and Storage (BECCUS) which is key to the UK meeting its carbon targets.[4]

The types of feedstocks AD plants use (wastes, residues, or crops) are listed on our website. The majority of plants (75 of 130) use a range of inputs – mixing locally grown crops and sources of wastes and residues. The second largest group (47) only use wastes and residues, which include sources such as sewage, domestic and commercial food waste collection systems, or the "leftovers" from food and drink manufacturing such as dairy processing or brewing and distilling. A small number (8) use only crops (described as Products/Co-Products in the Non-Domestic Renewable Heat Incentive (NDRHI) and Green Gas Support Scheme (GGSS)).

Plants commissioning since 2018 under the NDRHI or GGSS have had a "crop cap" which means that biomethane from crop above 50% of total production is not subsidised. This makes it unlikely that a significant number of crop-only plants will be built in the future.

There are a small number of plants that produce unsubsidised biomethane, meaning they are not supported by either the NDRHI or GGSS. We have issued 184 GWh of RGGOs for those plants since 2021, with a record amount of 74 GWh in 2025.

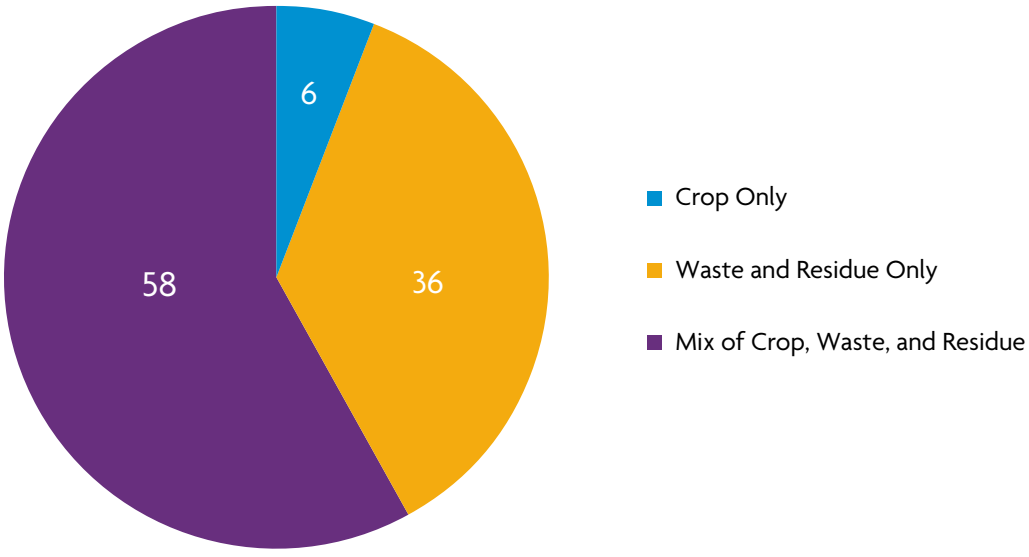


Figure 11 - Percentage (%) of biomethane producers by biomass input type

2. RGGOs are never issued for the kWh of fossil propane injected into the grid.
3. Note that this CO_2 is part of the biogenic short-term carbon cycle and does not add to atmospheric concentrations of CO_2 as the combustion of fossil fuels does.
4. https://www.theccc.org.uk/publication/sixth-carbon-budget/

Biopropane

Biopropane (also called bioLPG) is produced either as the by-product in the manufacturing of biodiesel from vegetable oils or from adding biogenic material into a fossil fuel refining process.

RGGOs are issued to propane suppliers who have their own distribution networks, such as Flogas and Calor, who have received biopropane either directly or via a mass balance method. Those suppliers can then allocate the RGGOs to the consumers they supply.

In 2025, the market became more active and Islands Energy Group Ltd also started offering a biopropane product backed by RGGOs.

Note that the information and statistics provided in this report relate to RGGOs issued for biomethane unless otherwise specified. With a small number of participants, GGCS cannot aggregate and anonymise the statistics for biopropane.

Hydrogen

Hydrogen can be produced through a variety of routes which could be considered a green gas under our rules. In 2025, we issued our first RGGOs for green hydrogen, created through electrolysis of water, powered through a mix of on-site and grid-sourced renewable electricity.

The UK Government is in the process of establishing a hydrogen certification scheme; however, we are ready to issue further RGGOs in the lead-up to that scheme going live and to cover any use cases that the government scheme may not.

Incentives for green gas production

The main source of revenue for green gas producers is income from the sale of their gas and from government incentive schemes, being either the NDRHI, the GGSS, or the Renewable Transport Fuel Obligation (RTFO).[5]

RGGOs provide an extra revenue stream which is recognised within Government's Impact Assessment of the Green Gas Support Scheme as being integral to the production model.

GGCS believes that RGGO income complements government support, allowing it to go further than it would otherwise and leads to the production of additional biomethane and green gas. We provide more information on this "additionality" concept on our website.

5. https://www.ofgem.gov.uk/environmental-and-social-schemes/non-domestic-renewable-heat-incentive-rhi
https://www.ofgem.gov.uk/environmental-and-social-schemes/green-gas-support-scheme-and-green-gas-levy
Renewable Transport Fuel Obligation - GOV.UK (www.gov.uk)

Sustainability criteria

The Scheme Rules set out criteria by which gases qualify as green and may be issued with RGGOs.

According to these rules green gases may be renewable or non-renewable, but in either case their production and consumption must represent a GHG savings in comparison to a higher carbon fossil product, with the level of savings needed set by a recognised scheme such as a UK government subsidy.

RGGOs are labelled to show the type of gas they represent and the sustainability criteria and associated GHG thresholds met. This means that traders and consumers can choose which green gases are appropriate to their situation for any mandatory, or voluntary, reporting and compliance schemes they may be part of.

While the Scheme had set its rules to be open to different gas types, to date all the RGGOs we have issued are for:

- Biomethane that has met the NDRHI, GGSS, or RTFO criteria[6].
- Biopropane that has met the ISCC/RTFO criteria.
- Hydrogen that met the GHG threshold for the UK Low Carbon Hydrogen Standard.

The NDRHI rules require the GHG emissions from the production of biomethane, up until the point of injection, to be no more than 125 gCO_2e/kWh[7], representing a 60% reduction on average emissions for delivery of a kWh of heat to a consumer in Europe.

In the vast majority of cases, biomethane production will be comfortably below that threshold e.g. 110 gCO_2e/kWh and below, and when using waste and residues as inputs, emissions of 35-70 gCO_2e/kWh are typical.

The GGSS requires producers to achieve at least a 70% GHG saving, making the threshold 86.4 gCO_2e/kWh[8]. Producers are able to use an average of the emissions from across all their feedstocks rather than calculating them on a feedstock-by-feedstock basis as they do for the NDRHI. Part of the GHG calculation accounts for methane leakage with the default values needed to meet the overall GHG threshold conditional on an annual leak detection programme and gas-tight digestate storage.

In addition to meeting a GHG threshold, the NDRHI and GGSS also require that feedstocks must not be grown on land converted from uses with high biodiversity or carbon storage value, such as peatland or forest.

Each year GGCS producers must provide us with independent audits which show that they have met the NDRHI or GGSS sustainability criteria, or, in any instance where NDRHI or GGSS was not claimed, that an equivalent set of criteria were met, such as those set out within the RTFO.

The GGCS publishes a guidance document on the Environmental Benefits and Impacts of Biomethane which is available here.

6. With the exception of a small volume of imported RGGOs representing biomethane produced outside the UK.
7. Equivalent to 34.8 gCO_2e/MJ. 1 kWh = 3.6 MJ. gCO_2e/kWh are always calculated against the lower heating value of methane, while RGGOs are issued according to the higher heating value.
8. Equivalent to 24.0 gCO_2e/MJ.

Reporting green gas use

GGCS works to improve the clarity and consistency of reporting rules related to governmental and non-governmental frameworks for GHG reporting. Our aim is to achieve greater recognition of the benefits of sourcing renewable gas supplies as part of corporate climate action plans. Depending on the type of consumer, green gas use may be reported against different sets of criteria and methodologies. We support our members and interested consumers with a range of advice and guidance documents specific to their situation.

Domestic consumers do not usually report the GHG emissions associated with their energy use. However, it is important that they are not misled and that they are provided with clear and accurate information regarding the way in which their gas use is matched to green gas production, on the basis of issuing and cancellation of RGGOs.

The Scheme Rules require that members must be "honest and transparent when marketing green gas" and that they "put in place robust processes to ensure that they are meeting their commitments to End-Use Consumers signed up to that tariff, by cancelling an appropriate quantity of RGGOs". We back that up by regularly requiring members to provide evidence of how they have met those rules.

The Scheme continues to be used as an "Approved Certification Scheme" within the Green Gas Levy framework. This is in addition to the recognition of GGCS RGGOs in determining derogations from the energy price cap.

Non-domestic consumers range in scale from small independent businesses through to multinational corporations, NGO sector organisations, and the wider public sector such as universities. Increasing numbers of these organisations are adopting carbon reduction targets as part of sector pledges e.g. delivering a Net Zero NHS, or individual corporate commitments on climate change. There is a range of statutory and voluntary emission reporting methods and obligations that apply to different groups of consumers.

The most widely used international reporting methodology is the Greenhouse Gas Protocol (GHGP) and guidance on the use of RGGOs within the protocol is provided here – www.greengas.org.uk/news/ggcs-guidance-documents.

The GHGP links to a range of emissions reporting and disclosure schemes such as the CDP and the SBTi and consumers are recommended to take the advice of any consultants and auditors they employ to help them understand how RGGOs can be used within these schemes. We have published a news item on our website summarising the latest developments in this space.

We have also published guidance on the Streamlined Energy and Carbon Reporting (SECR) rules, which makes it mandatory for large UK companies to report their GHG emissions to the Government.

There are several areas of emissions reporting where RGGOs are not yet recognised as evidence of green gas use including:

- The UK Emissions Trading Scheme (UK ETS).
- The EU Emission Trading Scheme (EU ETS) (with exceptions in a limited number of member states).
- Climate Change Agreements.
- Climate Change Levy.
- Low carbon building and planning regulations.

Whilst there is no formal consultation expected, we understand that recognition of biomethane via the grid for the UK ETS is being given serious consideration at different levels within the Department for Energy Security and Net Zero (DESNZ).

Maintaining a robust scheme

The GGCS is administered by Renewable Energy Assurance Limited (REAL), a subsidiary of the Renewable Energy Association (REA).

For 20 years REAL has developed a reputation for integrity and transparency in administering a variety of codes and schemes within the renewables and organics sectors.

REAL maintains ISO 9001 and ISO 14001 certification for its quality and environmental management systems, providing further evidence that it operates according to a clear set of principles and structures, seeking continually to improve its environmental performance.

As a result of our extensive efforts to maintain the highest standards, the GGCS has been able to maintain our status as an "Approved Certification Scheme" by the UK Government[9]. This status allows suppliers to use our Scheme to ensure compliance with the Green Gas Levy where they have requested an opt-out based on their supply of renewable fuel.

Rules and guidance

The GGCS is administered according to our Scheme Rules which are published on our website – www.greengas.org.uk.

The Scheme Rules require REAL to administer the Scheme in a fair and equitable manner and require Scheme Participants to be fair and transparent in their marketing of green gas.

The GGCS operates a whistleblowing policy to ensure that any concerns can be dealt with in the appropriate manner.

Member oversight

The Scheme Rules require the Scheme to be monitored by an Oversight Panel composed of its members. The Panel met in March and November 2025 with members providing feedback on a range of issues including, but not limited to, the ability to send RGGOs to the Swiss GO Registry Pronovo after it joined the ERGaR CoO Scheme in January, policy and market updates, and GGCS portal functionality.

The Oversight Panel is chaired by Sue Ellwood who is also an independent non-executive director on the REAL Board (LinkedIn profile here). She has a wealth of experience in the gas industry and a keen eye for compliance.

9. Exemptions from the Green Gas Levy (GGL): approved biomethane certification schemes - GOV.UK (www.gov.uk)

Monitoring compliance

The Scheme appointed Paul Adams of Synertree to conduct an audit of our activities between October 2024 and September 2025.

As was the case with previous audits the auditor confirmed that the Scheme has robust processes in place to issue, transfer, and cancel RGGOs, and that it has operated according to its Scheme Rules and contractual obligations with its members. The audit report is available to members on request.

The annual external audit is complemented by quarterly internal audits which assess the full spectrum of the Scheme's activities. These audits ensure that the correct procedures were followed during the year, be that when opening new accounts, issuing of RGGOs, or in the monitoring of domestic green gas tariff obligations and interactions of RGGO and ISCC Proofs of Sustainability.

Internal audits are assessed by our Compliance Committee led by an Independent Chair, Pamela Taylor (LinkedIn profile here). The Committee also reviews and challenges our processes and management systems, for example by:

- challenging instances where we have made corrections to RGGOs issued to ensure that the correct processes have been followed.
- continuously improving our risk register to ensure all risks have been assessed and appropriate mitigation actions are in place.

Verifying gas injection data

All biomethane producers who participate in the Scheme are required to produce independent, third-party verification of their meter readings and GHG calculations that form the basis of the RGGOs issued to them. This verification process also checks that RGGOs are correctly labelled as being for gas produced from waste, residue, or crop inputs.

This allows us to offer a high level of assurance to the market that RGGOs accurately represent the amount and nature of biomethane that is injected into the grid.

Maintaining a secure database

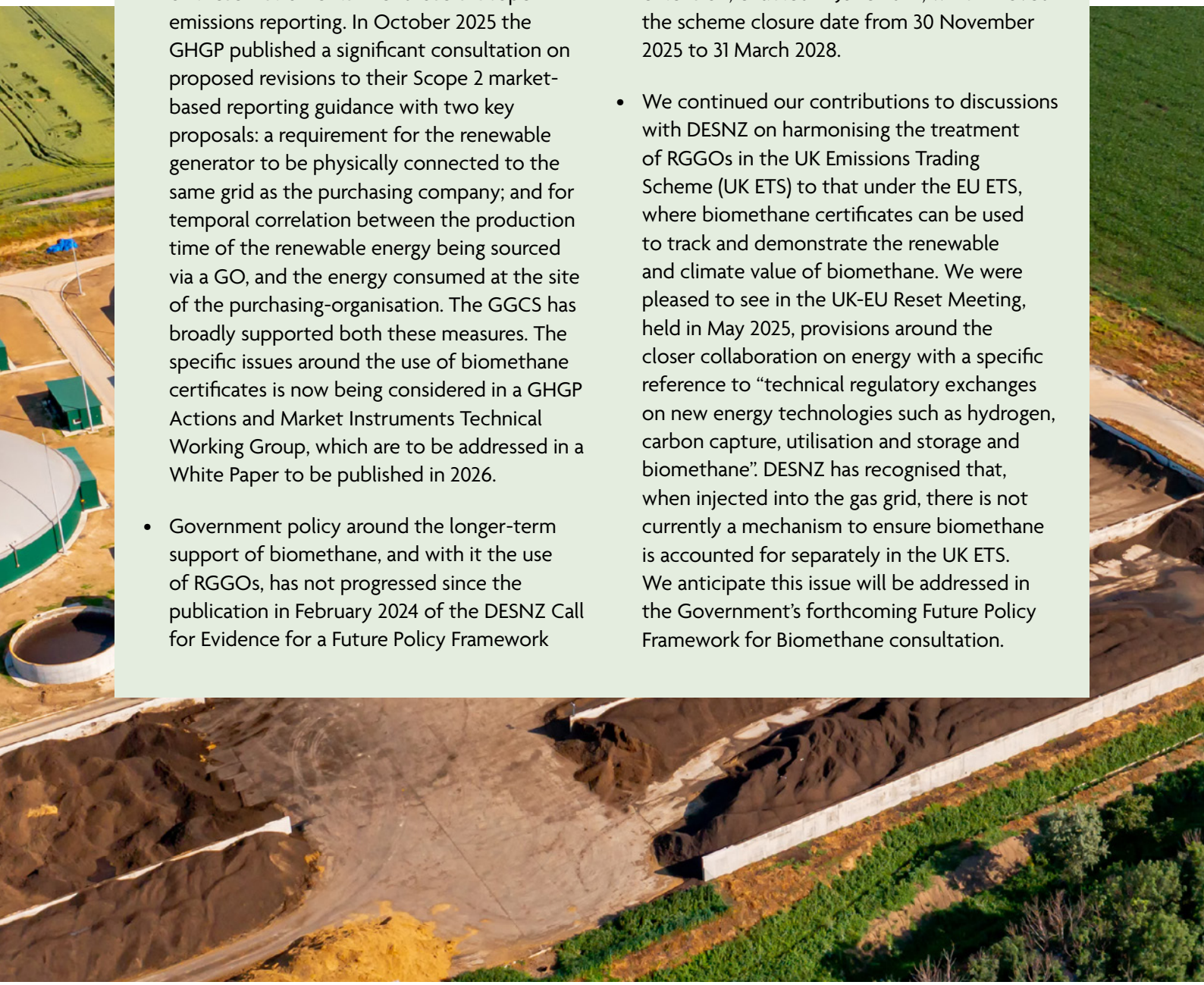
Each producer and trader has a secure account within the GGCS database where RGGOs are transferred and cancelled. Internal and external audits check that RGGOs cancelled can be tracked back to RGGOs issued without any duplication. The security features of the database are described here – www.greengas.org.uk/scheme/security.

Policy activity

- This year saw an increase in intensity around the discussion to how the contribution of grid-delivered biomethane should be treated within the GHG Protocol (GHGP) emissions reporting framework. On 10 February 2025, a coalition of industry organisations published a joint letter urging the GHG Protocol to "let green gas count". The coalition called for clarity around market instruments for renewable gaseous fuels in the GHGP and for full recognition of these instruments in end-users' Scope 1 emissions reporting. In October 2025 the GHGP published a significant consultation on proposed revisions to their Scope 2 market-based reporting guidance with two key proposals: a requirement for the renewable generator to be physically connected to the same grid as the purchasing company; and for temporal correlation between the production time of the renewable energy being sourced via a GO, and the energy consumed at the site of the purchasing-organisation. The GGCS has broadly supported both these measures. The specific issues around the use of biomethane certificates is now being considered in a GHGP Actions and Market Instruments Technical Working Group, which are to be addressed in a White Paper to be published in 2026.

- Government policy around the longer-term support of biomethane, and with it the use of RGGOs, has not progressed since the publication in February 2024 of the DESNZ Call for Evidence for a Future Policy Framework for Biomethane. It is now anticipated that the Government will set out its future proposals in a consultation paper to be released in early 2026. There was however positive news for the sector with the Government's announcement on 10 December 2025 on the operation of the Green Gas Support Scheme (GGSS), with an intention to extend the commissioning deadline for new biomethane plant developers to 31 March 2030. This follows a previous extension, enacted in June 2024, which moved the scheme closure date from 30 November 2025 to 31 March 2028.

- We continued our contributions to discussions with DESNZ on harmonising the treatment of RGGOs in the UK Emissions Trading Scheme (UK ETS) to that under the EU ETS, where biomethane certificates can be used to track and demonstrate the renewable and climate value of biomethane. We were pleased to see in the UK-EU Reset Meeting, held in May 2025, provisions around the closer collaboration on energy with a specific reference to "technical regulatory exchanges on new energy technologies such as hydrogen, carbon capture, utilisation and storage and biomethane". DESNZ has recognised that, when injected into the gas grid, there is not currently a mechanism to ensure biomethane is accounted for separately in the UK ETS. We anticipate this issue will be addressed in the Government's forthcoming Future Policy Framework for Biomethane consultation.



- We closely monitor the latest research released by the Government on the extent of methane leakage from anaerobic digestion plants during the production of biogas and biomethane. This is an issue of growing importance to the biomethane sector, both in terms of producers and purchasers of RGGOs. The January 2025 publication of the DESNZ commissioned Methane Emissions from Anaerobic Digestion (MEAD) study was an important contribution to this area. A more detailed follow up report is anticipated in early 2026.
- We were pleased to see strong support for the future growth of biomethane within the Gas Distribution Network Operators (GDNOs) RIIO-GD3 business plan submissions to Ofgem. This price control period for the sector will run from April 2026 to March 2031, and proposals set out include supporting increase flows of biomethane into the gas network, standardising network connections, an aim to reduce the need for propanation and targets for biomethane growth within GDNO regions.
- We engaged with the Green Gas Taskforce (GGT) and were pleased to see recognition of the value RGGOs bring in their study Reducing the cost of Net Zero with biomethane. Published at the sector's Green Gas Day in October 2025, it showed that "UK producers currently receive c.£7/MWh from RGGO sales, where the value is driven by voluntary purchasing".
- The GGCS continues to support the REA on a range of policy issues around biogas, biomethane, and green hydrogen.

10. www.gov.uk/government/publications/reporting-biomass-in-installations-ukets03-mrr/ukets03-mrr-reporting-biomass-in-installations

Meet the team

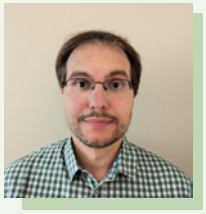
GGCS team members have a broad range of experience from across the renewables sector and provide Scheme Participants with an efficient and proactive service. The team members work hard across a range of policy areas to develop consumer and Government recognition for green gas.

Jesse Scharf
Scheme Director

9 Years with GGCS

Jesse is responsible for the day-to-day operation of the Scheme, and for developing new business areas such as piloting the use of Hydrogen GoOs and engaging with stakeholders in industry and Government.

He is on the board of the European Renewable Gas Registry (ERGaR), serving as Vice President and then President between 2019 and 2025, ensuring that the GGCS maintains close connections with our partners around Europe.



Boris Eremin
Senior Membership and Compliance Officer

7 Years with GGCS

Boris is an integral part of the GGCS team and well-known to both our producer and trader members. He supports them to register their gas injections, be issued with RGGOs, and transfer RGGOs to and from other registries in Europe which are members of the ERGaR Scheme.

Alongside that work he ensures that Scheme participants are billed correctly, the Scheme guidance documents are updated, and that our quarterly internal audit is conducted to the highest standard.

Emily Butler
Membership and Compliance Officer

2 Years with GGCS

Emily was well known to producers, aiding them with their gas registrations, and enabling RGGOs to be issued efficiently. She also ensured producers were up to date with their audits and aided the team in collating our quarterly internal audit. Emily left the Scheme in September 2025.

Lily Maris
Membership and Compliance Officer

< 1 Year with GGCS

Lily joined the GGCS Team in October 2025. With a background in data governance and analysis, she is responsible for aiding Producers with gas registrations and audit documentation. She will be producing our Quarterly Market Updates and looks forward to finding new insights to share with members.

Syed Ahmed OBE
Policy Advisor

11 Years with GGCS

Syed is a longstanding member of the GGCS team, providing invaluable advice on a range of policy topics that impact the green gas market.

He has a breadth of experience across the energy industry, including as a member of SGN's Customer Engagement Group during the passage of RIIO-GD2.

Words from GGCS members...

"Since 2018, GGCS has been an essential partner in our European biomethane business. Their certification platform combines technical rigor with friendly customer service. The integration with the German and Swiss registries, alongside their pan-European credit retirement capabilities, has been particularly valuable. This infrastructure has enabled us to efficiently serve buyers across all European markets – a capability that has become central to both our operations and our clients' compliance strategies. GGCS strikes the right balance between maintaining robust standards and facilitating market liquidity."

smartestenergy

"Carbon Zero Markets has greatly valued the support the GGCS has given us over the past year. The team has consistently demonstrated a high level of professionalism, responsiveness, integrity, and market expertise. Their collaborative approach, clear communication, and deep knowledge have made working together both efficient and highly productive and we greatly appreciate the positive and solutions-focused manner in which they support our trading activities. We look forward to continuing to work closely with the GGCS team over the coming years."

Czero MARKETS

In 2019 REAL achieved certification of its Quality Management System to the ISO 9001:2015 standard.

The ISO 9001:2015 standard is based on a number of quality management principles including a strong customer focus, the motivation and implication of top management, the process approach and continual improvement. Using ISO 9001 helps ensure that customers get consistent, good-quality products and services, which in turn brings many business benefits.

The seven quality management principles are:

- Customer focus.
- Leadership.
- Engagement of people.
- Process approach.
- Improvement.
- Evidence-based decision making.
- Relationship management.

For further information including membership lists of producers and traders active on the GGCS please visit: **www.greengas.org.uk**

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jscharf@greengas.org.uk

LinkedIn

GreenGas CERTIFICATION SCHEME

REAL RENEWABLE ENERGY ASSURANCE LIMITED